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# **Economic and Social Council**

Inland Transport Committee

23 January 2023

**Working Party on the Transport of Dangerous Goods**

Original: English

**Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)**

**Forty-first session**

Geneva, 23-27 January 2023

Item 5 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN: other proposals**

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## **Alternative propulsion systems/fuels in inland navigation: identifying necessary adjustments in the ADN**

**Transmitted by European Barge Union (EBU), and European Skippers Organisation (ESO)**

### **Introduction**

1. In document ECE/TRANS/WP.15/AC.2/2023/9 the delegation of EBU/ESO has proposed a change of 7.1.3.31 and 7.2.3.31.1 of ADN: the flashpoint of fuels of engines requirement to be  $>55^{\circ}$  C.
2. The historical background of the flashpoint requirement could be related to exclude gasoline engines, in the old days when only combustion engines on diesel and gasoline were available.
3. During the national ADN pre-meeting held in the Netherlands it appeared that the argumentation in 2023/9 wasn't really clear. This informal document needs to be considered as a further motivation for the proposal in document 2023/9.
4. At this moment several IWW vessels are being build or converted for the use of low flash-point fuels like methanol or hydrogen. All these vessels are subject to certification against ES-TRIN. According to ES-TRIN the use of low flash-point fuels is only allowed after a recommendation from the CESNI Committee or CCNR has been granted.
5. For obtaining such recommendation a procedure needs to be followed by the applicant, and part of this procedure is executing a risk assessment (Hazid study). With the Hazid study all foreseeable hazards and incidents are being considered. This includes fire, leakage, collisions, etc. Requirements for the content of the Hazid are also included in ES-TRIN, and are usually done according to international standards.
6. In the ADN only limited requirements for the propulsion and fuels are included as these will be covered in ES-TRIN or similar regulations in countries where ES-TRIN isn't applicable. It's not clear what requirements could be given by the ADN Safety Committee which are not already covered by ES-TRIN.
7. When the use of LNG as fuel became more usual derogations have been applied for at the ADN Safety Committee for the first few ships. Soon after these first derogations were granted the ADN has been amended with the present text in 7.1.3.31 and 7.2.3.31.1.
8. These derogations were issued only after a recommendation from the CCNR was issued, and they only took the possible interference of LNG with the ships' cargoes into

consideration. For both methanol and hydrogen as fuel it's clear that this will have no influence on the cargoes.

9. As it's not clear what the ADN Safety Committee could contribute to the use of low flash-point fuels, it seems practical to allow the use of these fuels providing the ship on which these fuels are being used is certified against ES-TRIN or a similar regulation in countries where ES-TRIN isn't applicable.

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