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Working Party on the Transport of Dangerous Goods

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)

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Item 5 (b) of the provisional agenda

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

Derogation for unmanned push barges in 9.3.3.60

Transmitted by the Government of Austria*, **

Summary

Executive summary: Section 9.3.3.60 stipulates that a shower and an eye and face bath must be provided on board all vessels in a place accessible directly from the cargo area and that the water must meet the quality of drinking water on board. This equipment requirement entails high costs for unmanned push barges, which do not seem justified for all goods.

Action to be taken: A replacement of the construction rule with a service requirement for unmanned derogation push barges carrying certain materials would guarantee the same or even higher levels of safety.

Related documents: None.

* Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2024/1.

** [A/77/6](#) (Sect. 20), table 20.5.



Introduction

1. Section 9.3.3.60 stipulates that a shower and an eye and face bath must be provided on board all vessels in a place accessible directly from the cargo area and that the water in such facilities must meet the quality of drinking water on board.
2. In future, unmanned push barges will also be used in the Danube area, in particular to transport diesel and petrol fuels. The use of pushed convoys is in line with the climate objectives of the European Union and the United Nations Economic Commission for Europe, as pushed convoys consume little energy per t/km and therefore generate few greenhouse gas emissions. For N-type tank barges in particular, there is no reason why crew members should be on board every push barge in the convoy. This is why ADN expressly states that, for example, the provisions of Part 7 apply to the entire convoy.
3. The construction rule specifying that unmanned push barges must also be equipped with a shower and eyewash facility, both of which must be supplied with drinking water, results in high investment and operating costs for unmanned push barges. In addition to the drinking water tank itself, it is necessary to install an energy source for the heater and the pump, and although the water is normally never used, it must be regularly changed and checked.
4. Given that, unlike drinking water tanks on manned vessels, routine operation does not require compliance with provisions designed to guarantee water quality, there is a risk that necessary water changes will be neglected and that, in the event of an emergency, the available water will be contaminated.
5. Apart from the construction rule under 9.3.3.60, ADN also contains a service requirement in 7.2.4.60 according to which the shower and the eye and face bath prescribed in the rules for construction must be kept ready in all weather conditions for use during loading and unloading operations and cargo transfer operations by pumping.
6. This raises the question of whether these facilities actually need to be available, particularly on unmanned N-type push barges not carrying corrosive substances, or whether quality would not be improved if they were made available by a manned convoy vessel or by the handling facility, or if the mobile facilities normally present on board a push convoy were used, which would only be placed on board the push barge during loading, unloading and cargo transfer operations by pumping.
7. Furthermore, the wording “The water shall meet the quality of drinking water on board” is not sufficiently clear. In the view of the Austrian delegation, this means that the water must meet the minimum requirements for drinking water on board vessels. However, the sentence can also be interpreted as referring to the actual quality of the drinking water available on board the vessel in question. As there is no drinking water on board unmanned push barges, this interpretation would make no sense. On crewed boats, this would also mean, for example, that the use of distilled water would be prohibited and that, if the boat is equipped with separate tanks for drinking water and showers, the on-deck shower would have to be connected to the drinking water system. The wording should therefore be clarified.

I. Proposal

8. In 9.3.x.60, replace the sentence “The water shall meet the quality of drinking water on board” with the following: “The water shall meet the minimum quality requirements applicable to drinking water on board vessels.”
9. Add the following sentence to 9.3.3.61: “If the list of substances for unmanned push barges does not include corrosive materials, it is not necessary that they be equipped with the shower and eye and face bath prescribed in 9.3.3.60.”
10. In 7.2.4.60, add the following sentences: “On unmanned push barges whose list of substances does not include corrosive substances, the shower and eye and face bath may also be provided on board a vessel forming part of the convoy or by the shore facility, at a point

directly accessible from the cargo area of the push barge, or a mobile shower and mobile eye and face bath may be provided on board the push barge.”

11. In 8.6.3, add the following point 10.4 to the checklist:

10.4 On unmanned push barges, are shower and eye and face baths directly accessible from the cargo area and ready for use?	O	O
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12. Add to the explanations regarding point 10: “For 10.4, see also 7.2.4.60 and 9.3.x.60.”

II. Justification

Safety:

13. It could be argued that a service requirement does not guarantee the same availability and therefore safety as a construction rule. However, in the case of the shower and the eye and face bath, the presence of these facilities does not guarantee the availability or quality of the water. Even now, availability and safety can only be guaranteed by proper operation. As the proposed derogation from the construction rules for unmanned push barges is compensated for by service requirements that are easier to comply with, the safety is even better.

14. Under 9.3.3.61, neither showers nor eye and face baths are required on board supply vessels. Given that, as indicated in 7.2.4.60, contact of persons with cargo is more likely to occur during loading and unloading and during pumping or pouring transshipments, and that these operations are much more frequent on board supply vessels than on board unmanned push barges, comparable safety would be ensured on board unmanned push barges carrying only petroleum products, even in the absence of showers and eye and face baths. In comparison with supply vessels, the proposal offers better safety.

15. The addition of a new item to the checklist, which must be checked for all unmanned barges, regardless of whether the shower and eye and face baths are permanently installed or only made available, admittedly represents a slight additional constraint for unmanned push barges that are already equipped with shower and eye and face baths, but this seems acceptable in view of the effective availability of these facilities, and it helps to improve safety.

Feasibility:

16. The modification does not require any changes to existing push barges, but it offers an option both for unmanned push barges that are already in service and for those that will enter service in future, which makes it possible to reduce investment and operating costs without compromising safety.

Transitional period:

17. No transitional period is needed.

Implementation:

18. Compliance with the proposed service specification can be monitored both by those involved in handling operations and by the supervisory authorities.

Sustainable Development Goals (SDGs):

19. Even if the quantities involved seem negligible, the proposal contributes to the responsible use of drinking water and energy.
