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Inland Transport Committee

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**

Contradiction between 9.3.x.51 and 7.2.3.51.4

Transmitted by the Government of Austria*, **

Summary

Executive summary: There is a contradiction between 9.3.x.51 and 7.2.3.51.4 with regard to explosion protection provisions: according to 9.3.x.51, the requirement referred to in letter (c) must always be complied with. Only the requirements referred to in letters (a) and (b) are subject to derogation, i.e., the installations and equipment concerned may instead be marked in red and shut down. However, 7.2.3.51.4 also mentions installations and equipment that do not meet the requirements of 9.3.x.51 (c) and are marked in red. This is confusing and should be corrected.

Action to be taken: In 7.2.3.51.4, delete the reference to 9.3.x.51 (c).

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.2/2024/2.

** [A/78/6](#) (Sect. 20), table 20.5.



Introduction

1. Section 9.3.x.51 contains construction-related requirements concerning the surface temperatures of installations and equipment. In 9.3.x.51, subparagraph (d) stipulates that the surface temperatures required in 9.3.x.51 (a) and (b) may be exceeded if the installations and equipment concerned can be shut down and are marked in red.
2. No derogation is provided for the more stringent surface temperature requirements for temperature classes T4, T5 and T6 listed in 9.3.x.51 (c).
3. This means that the possibility of shutting down installations and equipment marked in red is applicable only to vessels whose list of substances does not include substances of temperature classes T4, T5 or T6.
4. In several other places, derogations to 9.3.x.51 (a) and (b) are correctly mentioned.
5. In 7.2.3.51.4, however, it is stated that installations and equipment that do not comply with 9.3.x.51 (c) and are marked in red must also be shut down. This service requirement is confusing, as the requirements of 9.3.x.51 (c) must be met on board each vessel. Nor is there any transitional provision for 9.3.x.51 (c).

Proposal

6. In 7.2.3.51.4, delete “9.3.x.51 (c)”.

Justification

Safety:

7. Removing this unnecessary service requirement will not affect safety. There is a reduced risk of misinterpretation.

Transitional period:

8. There is no need for a transitional period.

Implementation:

9. The deletion will make the text clearer for the supervisory authorities as well.
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