

Economic and Social Council

Inland Transport Committee

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Working Party on the Transport of Dangerous Goods

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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-third session

Geneva, 22-26 January 2024

Item 5(b) of the provisional agenda

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

7.2.4.22 Opening of openings and the dosing of extra additives

Transmitted by FuelsEurope

Summary

Related documents: ECE/TRANS/WP.15/AC.2/2024/7 (Germany)
ECE/TRANS/WP.15/AC.2/2024/20 (FuelsEurope)

Executive summary: After publication on UNECE, it appeared that our proposals in document 2024/20 no longer align with those referred to in document 2024/7 (Germany).

For improved legibility of FuelsEurope's proposals as captured in Document 2024/20, these now follow the structure of working document 2024/7 (Germany).

Introduction

1. During the August 2023 session of the ADN Safety Committee, the representative of Germany offered to consider additionally received comments on the topic of opening of openings, for discussion during the January 2024 session. The specific articles for consideration have been reflected in report ECE/TRANS/WP.15/AC.2/86.
2. FuelsEurope welcomes the proposals contained in document ECE/TRANS/WP.15/AC.2/2023/47. However, it was recognized by the industry that these did not take fully into account the current needs of the fillers in the operational process of transporting liquid dangerous goods.
3. This need concerns the additional dosing of extra additives on board of inland waterway tankers and FuelsEurope submitted document 2024/20 reflecting proposals in the structure of document 2023/47.
4. Following the material change of structure now reflected in document 2024/7 there is a need to restructure the proposals as captured in document 2024/20.
5. To facilitate a smooth discussion and comparison of provisions and proposals, we hereby present our proposals following the format of document 2024/7.

6. Identical to the additional dosing of extra stabilizers as described in the German proposals, additional dosing of other additives on board can also be done in a safe manner.
7. The proposals fully align with the below Principles of the ADN, as agreed between the contracting parties:

**“EUROPEAN AGREEMENT CONCERNING THE
INTERNATIONAL CARRIAGE OF DANGEROUS GOODS
BY INLAND WATERWAYS (ADN)**

THE CONTRACTING PARTIES,

**DESIRING to establish by joint agreement uniform principles and rules,
for the purposes of:**

- (a) increasing the safety of international carriage of dangerous goods by inland waterways;
- (b) contributing effectively to the protection of the environment, by preventing any pollution resulting from accidents or incidents during such carriage; and
- (c) facilitating transport operations and promoting international trade,”

I. Our proposals to allow additional dosing of extra additives

7.2.4.22, Opening of openings of cargo tanks (general):

8. in 7.2.4.22.1, after “*For the subsequent addition of stabilizer in exceptional cases,*” add a new indent:

*** For the subsequent addition of other additives, in exceptional cases, after loading but before the journey commences, or after the journey ends but before the discharge,**

- In 7.2.4.22.13, replace “or stabilizer” by “**, stabilizer, or other additives**”
- 7.2.4.22.15: Rename 7.2.4.22.15 to read: “**7.2.4.22.15 Addition of stabilizer or other additives in exceptional cases**” and insert new 7.2.4.22.15.1 and 7.2.4.22.15.2:
- **7.2.4.22.15.1 If an unforeseen extension of the navigation time requires the addition of extra stabilizer to one or more cargo tanks during transport, this is only permitted through the sampling opening. Electrostatic charges shall be prevented.**

7.2.4.22.15.2 If measurement data shows a lower than legally prescribed dosing rate in the cargo and if this requires the addition of extra additive to one or more cargo tanks during transport, this is only permitted through the sampling opening. Electrostatic charges shall be prevented.

9. As a result of proposed amendment of 7.2.4.22.13, we repeat our proposal as per working document 2024/20, for an amendment to 7.2.4.16.8, second paragraph:

7.2.4.16.8, after: “*...taking samples,*” and before “*or carrying out measurements..*”, insert : **adding additives (see 7.2.4.22)**

10. Bearing in mind that the additional additivation on board requires packages to be brought into the cargo zone for a short time, we also repeat our proposal as per working document 2024/20, to insert a new 7.2.4.1.5, detailing the conditions to be met:

7.2.4.1.5 On board of vessels and for the sole purpose of additivation (see 7.2.4.22) it is allowed to bring packages with additives in the cargo zone for the duration of the additivation operation only. This operation shall take place after

the loading has stopped and before the ship commences its journey, or after the ship ends its journey and before the unloading starts. The particulars of 7.2.4.22 shall be taken into consideration. [The total quantity of the packages shall not exceed ... and the total weight of the full packages shall not exceed ...kg. The weight of a single package shall be limited to .. kg.]

II. Justification

11. Safety: Less additional handling /discharge/loading operations and ship movements: With dosing rate below the legally required norms and no legal means to correct the error on board of ships, ships would have to leave their loading installation, go to somewhere else, then discharge their cargo, load their cargo again. Generally, loading installations cannot take back cargo once it contains additives.

12. This is extra handling of hundreds, or thousands of tons of dangerous goods on already congested waterways in port areas and therefore extra, avoidable risk, versus the safe additional dosing of relatively small volumes via sampling system on board of inland waterway tankers.

13. Additivation occurs on a case-by-case basis. Shore tanks contain the pure product with no additives. Shore tanks seldom contain additivated products. The discharge of an additivated cargo back in a shore tank means that the pure product is lost and that the shore piping system (which is also in use for other products) contains unacceptable levels of additives.

14. Allowing the described operation of additional dosing of extra additives via the sampling opening in prescribed cases will mean comparatively very little handling which means little risk.

15. For other justification we refer to working document 2024/20.

III. Conclusion

16. The proposals under paragraph 8 are repeats of those in working document 2024/20 but they now follow the new article numbers introduced in working document 2024/7.

17. Likewise, the proposals under paragraph 9 and 10 are repeats of those in working document 2024/20. They are mentioned in this INF as the proposals under 8 trigger a change in 7.2.4.16.8 and they trigger the necessity for a new article 7.2.4.1.5.

18. For other conclusions i.e, blending on board; packages in the cargo zone and the safe use of mobile systems we refer to document 2024/20.

IV. Interlinkage to Sustainable Development Goals

19. New insights in handling of (hazardous) materials and considering its consequences on the ongoing safe handling, storage and transport of those hazardous materials can be linked to Sustainable Development Goal 3: Good health and well-being – Reducing health risks of hazardous materials.

20. As this links to sustainable transport, also Sustainable Development Goal 11 can be considered.

V. Action to be taken

21. FuelsEurope therefore invites the ADN Safety Committee to consider the proposals tabled under paragraphs 8, 9 and 10, considering the justification under paragraph 11 and 12, and to act as it deems appropriate, for entry into force on 1 January 2025.