

WP.15/AC.2/15/INF.2

ECONOMIC COMMISSION FOR EUROPE

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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CHAPTER 1.6 – TRANSITIONAL MEASURES

Comments on document WP.15/AC.2/14/INF8 (14th session)

Submitted by the representative of Belgium

Preliminary comment: in the table in INF.8 there are many editorial errors (double numbering, incomplete ADNR numbers, ...). These errors are not mentioned in the comments below. However, the new version of the document should be corrected accordingly.

General comment regarding table 3.3 dry cargo vessels: this suggests that half of the dry cargo vessels with a certificate of approval were built after 1995 (see for example Nos. 1 and 10). However, 90 % of Belgian dry cargo vessels with a certificate of approval were built before 1995. The percentage of boats concerned therefore should be revised upwards.

Comments on the different numbers:

1. It should be borne in mind that to meet this provision it is necessary to fit the hold with ventilation shafts, leading to a loss of cargo capacity. The deadline of 2015 is considered too soon.
5. On some boats a modification is very difficult because of the positioning of the cabins and the wheelhouse. The deadline of 2015 is considered too soon.
9. There is a serious problem with the independence of the two fire pumps when the vessel is equipped with only one engine room and one generator.
Proposal: separate 40.1 and assign a date of 2035 for the first indent.
10. It is completely inconceivable to propose a deadline here of 2015 when for the same equipment for tank vessels (No. 122) there is a deadline of 2035.
In addition, this paragraph does not apply to new tug boats pushing dry cargo vessels.
Proposal: deadline 2035.
19. Does not pose a problem for Belgian vessels. Proposal: with immediate effect.

20. Superfluous transitional provision since 7.2.2.19.1 is applicable. Proposal: with immediate effect.
30. To be combined with 65 to 66 (stability when damaged). Therefore deadline 2035.
31. To be combined with 62 to 64. Therefore deadline 2035.
32. See number 108. Proposal: with immediate effect.
33. There remain problems with the provision itself. The EN standard does not go to a diameter of 50 mm
36. Does not pose a problem for Belgian vessels. Proposal: with immediate effect
54. Small vessels up to 86 m have a problem with the dimensions.
Proposal: deadline 2035.
74. Does not pose a problem for Belgian vessels. Proposal: with immediate effect
82. and 83.
The transitional provision itself could be a deleted in 2011.
- 90., 91. and 92.
The replacement of manometers and thermometers by alarms and pump checks has significant economic costs.
Proposal: deadline 2035.
94. The expiration of this transitional provision should be in parallel with the adaptation of the height of sills. Proposal: deadline 2015.
95. The horizontal space for the gas return pipe is difficult to modify. Proposal: deadline 2018.
106. The horizontal space for the loading and unloading pipes is even more difficult to modify than for the gas return pipe. Proposal: deadline 2035.
114. 9.3.x.31.4 is on the list of problems relating to protection against explosion. The deadline could be left open until the amendments regarding protection against explosion have been formulated.
116. See also No. 6. In the visit regulation for vessels on the Rhine the date of 2010 is given.
Proposal: with immediate effect.
121. There is a serious problem with the independence of the two fire pumps when the vessel has only one engine room or generator.
Proposal: separate 40.1 and assign the deadline of 2035 for the first indent.
129. and 130.
Poses no problem for Belgian vessels. Proposal: with immediate effect.
Possibly take up these transitional provisions in the future discussion concerning protection against explosions.
134. Very difficult to put in place for vessels with different distribution tables in the engine rooms and in the wheelhouse.
Proposal: deadline 2035.

137. Does not pose a problem for Belgian vessels. Proposal: with immediate effect.
