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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 Waterway (ADN)

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Item 4 (b) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO THE REGULATIONS ANNEXED TO ADN

Other amendment proposals

Sub-section 1.6.7

Submitted by Germany

Introduction

1. In document WP.15/AC.2/2010/11, the EBU puts forth a proposal for the inclusion of transitional provisions for the modification of tank vessels (replacement of sections). Germany is of the opinion that the proposal as submitted cannot be accepted for reasons of legal systematics. Moreover, the remarks contained in the table are difficult to understand.

2. The aim of the EBU to allow for the modification of new single-hull vessels in Type N double-hull vessels is supported by Germany. In a small informal working group with the participation of the industries concerned (EBU, CEFIC) and of the Netherlands, the following proposal has been elaborated.

Proposal

3. Insert the following new sub-section 1.6.7.5:

"1.6.7.5 Transitional provisions concerning the modification of tank vessels

1.6.7.5.1 The modification of the cargo area of a vessel in order to achieve a Type N double-hull vessel is admissible until 31 December 2018 under the following conditions:

- The transitional provisions under sub-section 1.6.7.3 have not been applied before the modification.
- The modified or new cargo area shall comply with the provisions of ADN. Transitional provisions under paragraph 1.6.7.2.2 may not be applied for the cargo area.
- The vessel parts outside of the cargo area shall comply with the provisions of ADN. Moreover, the following transitional provisions under paragraph 1.6.7.2.2 may be applied:

[7.2.3.20]
7.2.3.20.1.

- In addition, for the vessel parts outside of the cargo area, one or more of the following transitional provisions under paragraph 1.6.7.2.2 may be applied:
 - 1.2.1
 - 9.3.3.0.3 (d)
 - 9.3.3.51.3
 - 9.3.3.52.4 last sentence.

In this case, no dangerous goods requiring explosion protection may be entered in the list in accordance with paragraph 1.16.1.2.5.

- The application of this sub-section shall be entered in the certificate of approval under No. 12 (Additional observations).

1.6.7.5.2 Modified vessels may continue to be operated beyond 31 December 2018. The time limits stipulated in the applied transitional provisions under 1.6.7.2.2 shall be observed.”

Justification

4. The changeover to the mandatory use of double-hull vessels for almost all substances accepted for carriage in tank vessels as from 2019 at the latest is a massive encroachment upon the fleet policy of the tank vessel shipping industry. Indeed the concept and the gradation of the time limits geared to this concept were aimed first and foremost at providing the required transport capacity by means of new constructions. However, it is hardly justifiable to take from relatively new single-hull vessels the possibility to engage in the carriage of dangerous goods by tank vessels. There are practically no alternative markets.

Safety

5. There are no problems foreseen from the point of view of safety. The applicability of transitional provisions has been substantially reduced. As regards the cargo area, no transitional provisions may be applied. This ensures that the modified tank vessels essentially comply with the applicable provisions of ADN.

Feasibility

6. The proposed provision is generally considered feasible by the industry. During the session of the informal working group, individual members expressed the opinion that the restriction to goods which do not require explosion protection is not necessary.
