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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 Waterways (ADN) (ADN Safety Committee)

#### Nineteenth session

Geneva, 22–25 August 2011

Item 4 of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN**

### Heavy fuel oil

**Transmitted by the Government of Germany<sup>1, 2</sup>**

### Introduction

1. At the eighteenth session of the Safety Committee, questions relating to the transport of heavy fuel oil were discussed on the basis of informal document INF.11 submitted by Germany. The Committee requested that a proposal should be made at the nineteenth session for an entry in Table C that would authorize the transport of heavy fuel oil in double-hull tank vessels of type N (see ECE/TRANS/WP.15/AC.2/38, paras. 25–28).

2. The informal working group on substances studied the issue at a meeting on 18 and 19 May 2011. It emerged that, the specific subject of heavy fuel oil classification aside, an agreement should first be reached on fundamental classification issues concerning assignment to specific numbers of the ADN 9000 series.

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<sup>1</sup> Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2011/39.

<sup>2</sup> In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/2010/8, programme activity 02.7 (b)).

## Outcome

3. The outcome of the discussion of the fundamental classification issues is summarized below:

(a) The participants came to the unanimous conclusion that assignment to specific ADN 9000 series numbers should take place only when the criteria for assignment to regular UN numbers were not met. It was noted that that principle was not reflected consistently in the current Regulations annexed to ADN.

(b) The participants considered that it would be appropriate, when assigning to 9000 series numbers, to refer to the fundamental principles set out in the table of precedence of hazards, in 2.1.3.10. It was further noted that that principle did not appear in the current annexed Regulations.

4. The informal working group discussed various solutions to the problem of regulations for the transport of heavy fuel oil. The decision among the various options proved to be in part a political one. For that reason, the informal working group has presented its views on possible solutions in the current document and recommends that the Safety Committee should resume consultations on the issue.

5. The following options were discussed:

(a) No amendment to be made to the Regulations. Heavy fuel oil would then have to be transported in type C tank vessels. It was noted that, in some cases, an “N2” or “N3” hazard to the environment code could be assigned on the basis of data on degradation. Carriage in type N double- or single-hull tank vessels would thus be possible;

(b) Heavy fuel oil to be subject, under a different name, to specific regulations as compared with the existing criteria;

(c) The UN numbers to which heavy fuel oil might be assigned according to the most recent information available (3082, 9001 and 9003) to be subject to specific regulations. All substances assigned to those codes besides heavy fuel oil would consequently also be subject to those specific regulations;

(d) An additional distinction to be made in the “Flowchart for classification of liquids of Classes 3, 6.1, 8 and 9 for carriage in tanks in inland navigation” (Chapter 3.2, after Table C);

The flowchart would be amended in two places:

(i) In the second box, “and with vapour pressure at 50° C  $\geq$  110 kPa” would be inserted in the eighth bullet point, “Substances characterized by acute or chronic 1 aquatic toxicity (N1: criteria according to 2.2.9.1.10.2)”;

(ii) In the fifth box, the fourth bullet, “Substances characterized by chronic 2 or 3 aquatic toxicity (N2: criteria according to 2.2.9.1.10.2)”, would be amended to read “Substances characterized by acute 1 aquatic toxicity and chronic 1, 2 or 3 aquatic toxicity (N1 and N2: criteria according to 2.2.9.1.10.2).”

That would mean that substances assigned an “N1” hazard to the aquatic environment code and also having high vapour pressure should be carried in a type C tank vessel.

Substances that must be assigned an “N1” hazard to the aquatic environment code and having low vapour pressure (such as heavy fuel oil) would be carried in double-hull type N tank vessels.

(e) An additional distinction to be made in the “Flowchart for classification of liquids of Classes 3, 6.1, 8 and 9 for carriage in tanks in inland navigation”.

The flowchart would be amended in two places:

(i) In the second box, the eighth bullet point, “Substances characterized by acute or chronic 1 aquatic toxicity (N1: criteria according to 2.2.9.1.10.2)” would be deleted;

(ii) In the fifth box, the fourth bullet point, “Substances characterized by chronic 2 or 3 aquatic toxicity (N2: criteria according to 2.2.9.1.10.2)”, would be amended to read “Substances characterized by acute 1 aquatic toxicity and chronic 1, 2 or 3 aquatic toxicity (N1 and N2: criteria according to 2.2.9.1.10.2).”

This would mean that all substances that must be assigned an “N1” hazard to the aquatic environment code could no longer be carried in type C tank vessels but should be carried in type N double-hull tank vessels.

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