



JOINT MEETING OF EXPERTS ON THE REGULATIONS ANNEXED TO THE
EUROPEAN AGREEMENT CONCERNING THE INTERNATIONAL CARRIAGE
OF DANGEROUS GOODS BY INLAND WATERWAYS (ADN)
(SAFETY COMMITTEE)
(Twenty-third session, Geneva, 26-30 August 2013)
Item 4b of the provisional agenda

Comment regarding the report of the informal working group on means of evacuation

(Comment on document ADN/WP.15/AC.2/2013/28)

Transmitted by the European Barge Union (EBU)

Introduction

The result of several discussions about a new escape route concept in the ADN is presented in document CCNR-ZKR/ADN/WP.15/AC.2/42. In that document the term "safe area", as an amendment of item 1.2.1 of ADN, has been defined as follows.

"Safe area means an area outside the cargo area protecting against the identified hazards of the cargo by a water screen."

On the basis of this definition, the inland navigation industry has consented to the modification of the carrier obligations in 1.4.2:

"1.4.2.1 d)

ascertain that a second means of evacuation in the event of an emergency from the vessel side is available, when the landside installation is not equipped with a second necessary means of evacuation."

The inland navigation industry had proceeded from the assumption that, where required, for the quantitatively most important loads (viz. those of the classes 2 and 3 as well as 4.1, 4.2 and 4.3) the carriers would be able to provide two safe areas at the opposite ends of their vessels by means of water screens (cf. item 12 of the table to 7.1.4.77 and 7.2.4.77 in CCNR-ZKR/ADN/WP.15/AC.2/42) and could thus comply with the provision.

Result of the informal working group on means of evacuation

In its meeting on 3 April 2013 the informal working group on means of evacuation had the task to elaborate more detailed provisions for the definition of the terms “safe area”, “safe haven” and “water screen”.

In document CCNR-ZKR/ADN/WP.15/2013/28 it is proposed to change the definition of “safe area” to read as follows:

“Safe area means a designated, recognisable area outside the cargo area which can be readily accessed by all persons on board. The safe area provides protection against the identified hazards of the cargo by a water screen for at least 60 minutes. The safe area can be evacuated during an incident. A safe area is not acceptable when the identified danger is fire or explosion.”

In table 7.1.4.77

- d) line no. 12, column 4.1, 4.2, 4.3

and in table 7.2.4.77

- d) line no. 12, column 2, 3 packing group I, II and remainder of III

the items, which obviously mean “applicable”, must be deleted.

Consequence of the proposal of the informal working group

If these proposals were implemented, it would no longer be possible that, where required, for the quantitatively most important loads (viz. those of the classes 2 and 3 as well as of the classes 4.1, 4.2 and 4.3) the carriers could provide two safe areas at the opposite ends of their vessels by means of water screens.

Furthermore, according to the above-mentioned modification of 1.4.2.2.1 (d) the carriers are obliged, where required, to provide a second escape route. If the proposal was adopted, the following options would be available:

- Provision of a second escape route (i.e. a stationary connection to the landside) or
- Provision of an evacuation boat or
- Provision of an escape boat or
- Provision of a safe haven outside the vessel including the safe route thereto.

Statement of the EBU

- The proposal contained in document CCNR-ZKR/ADN/WP.15/2013/28 goes beyond the result of the working group meeting of 3 April 2013. The final wording of the proposal was not agreed in the meeting but was found at a later date and is therefore not coordinated with all members of the working group.
- In its meeting on 3 April 2013 the working group has gone beyond its assigned task in that it did not elaborate more detailed provisions for the definition of “safe area” but instead changed the definition itself.
- The inland navigation industry has agreed to the change in its obligations in the form of a compromise but on the assumption that the provision of water screens and the creation of safe havens will be sufficient as a second escape route for all comprehensible risks.
- All alternatives to a safe area created by a water screen are unacceptable and/or not feasible for the inland navigation industry.

Position of the EBU

The changes proposed by the working group ought not to be adopted.

The EBU requests to return to the term of safe area as defined in the document CCNR-ZKR/ADN/WP.15/AC.2/42 and to make detailed provisions within the scope of that definition.

In addition, the EBU requests, as a precaution, – if the above request is rejected – to abrogate the carrier’s obligation of providing a second escape route.
