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)
Twenty-fourth session
Item 5 (b) of the provisional agenda
Proposals for amendments to the Regulations annexed to ADN:
Other proposals

3.2.3.1 Explanations concerning Table C – Update of remark 2 in column (20)

Transmitted by the Governments of Germany and the Netherlands¹,²

Summary

Executive summary: It has been found that, as they currently stand, the criteria for including special requirement/remark 2 in column 20 do not cover all possible cases. This could lead to safety (technical) and practical problems in applying ADN.

Action to be taken: For ADN 2015: Amendment of the criteria for application of requirement/remark 2 in column (20).
Application of requirement/remark 2 to other substances.

ECE/TRANS/WP.15/AC.2/48, paras. 49–54.

¹ In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94, ECE/TRANS/2012/12, programme activity 02.7, (A1b)).
² Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2014/21.
Introduction

1. At its twenty-third session in August 2013, at the request of the informal working group on the carriage of UN No. 1972, the Safety Committee considered the question of including LNG (UN No. 1972) in Table C: “List of dangerous goods accepted for carriage in tank vessels in numerical order”. It was decided to include requirement/remark 2 in column (20) of Table C in order to ensure the proper degree of safety.

2. It has been noted that, also in the transport of other gases already mentioned in Table C and for which danger 2.1 is included in column (5) (UN No. 1005, UN No. 1011, UN No. 1012, UN No. 1030, UN No. 1033, UN No. 1038, UN No. 1055, UN No. 1063, UN No. 1077, UN No. 1083, UN No. 1912, UN No. 1965, UN No. 1969, UN No. 1978, UN No. 9000), it is common practice, for technical safety reasons, to remove air and keep it at a sufficient distance from the cargo tanks and piping, before loading or after inspection, entering the shipyard, repairs, etc.

3. Hitherto this practice, though sensible and warranted on technical safety grounds, is not required under ADN.

Proposal

4. Germany and the Netherlands propose that the following amendments should be adopted for ADN 2015.

   (a) In subsection 3.2.3.3, “Flowchart, schemes and criteria for determining applicable special requirements”, amend remark 2 for column (20) as follows:

   “Reference shall be made in column (20) to remark 2 for stabilized substances that react with oxygen and for gases for which danger 2.1 is mentioned in column 5”.

   (b) In subsection 3.2.4.3, “Criteria for assignment of substances”, under L column (20), amend remark 2 as follows:

   “Reference shall be made in column (20) to remark 2 for stabilized substances that react with oxygen and for gases for which danger 2.1 is mentioned in column 5”.

   (c) In subsection 3.2.3.2 Table C, for UN No. 1005, UN No. 1011 (twice), UN No. 1012, UN No. 1030, UN No. 1033, UN No. 1038, UN No. 1055, UN No. 1063, UN No. 1077, UN No. 1083, UN No. 1912, UN No. 1965 (9 times), UN No. 1969 (twice), UN No. 1978 and UN No. 9000, insert “2” in column (20).

5. The text of remark 2, even as amended, remains unchanged.

Justification

6. The measures taken hitherto on a voluntary basis become a binding requirement.

Safety

7. Safety is not affected.
Feasibility

8. No major expenses are expected since this is already common practice. It is therefore not necessary to include a transitional provision.