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**Economic Commission for Europe**

English

**Inland Transport Committee**

**16 December 2014**

**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)**

**Twenty-sixth session**

Geneva, 27-30 January 2015

Agenda item 5 (b)

**Proposals for amendments to the regulations annexed to ADN:**

**Other proposals**

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### **Exemption in sub-section 1.1.3.3**

**Transmitted by the Government of Germany**

#### *Summary*

**Analytical summary:** As a rule, non-negligible quantities of more than 100 kilograms and more than 100 litres are carried on board inland waterway vessels for repair and maintenance work. In accordance with the recast of sub-section 1.1.3.3 of ADN effective from 1 January 2015, dangerous goods used for the upkeep of the vessels do no longer fall under the exemption.

**Action to be taken:** Amend exemption arrangement in 1.1.3.3 of ADN.

**Related documents:** CCNR-ZKR/ADN/27

#### **Introduction**

1. Experience has shown that larger quantities in particular of paints, solvents, tar, oils, anti-rust agents and other dangerous goods are taken on board of inland waterway vessels in spring to carry out regular repair work on the vessel by the next winter. It may very well be that quantities of several 100 litres/kilograms are carried on board as supplies.
2. In the version applicable until 31 December 2014, the exemption in 1.1.3.3 also covered “*substances used for the propulsion of vessels, ..., for their upkeep or to ensure safety*”. The above-mentioned products were assigned to the exemption for the upkeep of the vessels.
3. In the first indent of the version of 1.1.3.3 applicable from 1 January 2015, only those dangerous goods are exempted which are used for the propulsion of vessels but not those used for their upkeep.
4. The application of the exemption arrangement in 1.1.3.1 (c): “*the carriage undertaken by enterprises which is ancillary to their main activities*” does not seem clear enough.

5. The German delegation is not aware of any problems with the approach mentioned under no. 2 above.

### **Proposal**

6. Insert a new second indent in sub-section 1.1.3.3 of ADN:  
“ - for the upkeep of vessels.”.

### **Justification:**

7. Restoration of the former legal situation.

### **Safety**

8. There are no known incidents or problems connected to the carriage of exempted dangerous goods for the upkeep of the vessels.

### **Feasibility**

9. Continuation of the previous approach.
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