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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-ninth session

Geneva, 22-25 August 2016

Item 3 (c) of the provisional agenda

Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN):

Interpretation of the Regulations annexed to ADN

Bilge pumping and ballasting arrangements under ADN 9.3.2.35.1

Transmitted by the Central Commission for the Navigation of the Rhine (CCNR)^{1,2}

I. Introduction

1. A tank vessel navigation company has submitted some questions to the CCNR secretariat about the interpretation of paragraph 9.3.2.35.1 relating to bilge pumping and ballasting arrangements. The CCNR Dangerous Substances Committee considered this subject at its meeting held on 7 April 2016 and invited the CCNR secretariat to submit the following proposal to the Safety Committee to deal further with the matter.

¹ Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2016/32.

² In accordance with the programme of work of the Inland Transport Committee for 2016-2017 (ECE/TRANS/2016/28/Add.1 (9.3)).



II. Context

2. The interpretation issue related to the location of a water-operated eductor for the stripping of double bottoms and double-hull spaces. During the design of the vessel, the eductor was located in a ballast space outside the cargo area (between the cofferdam and the technical service space). The eductor is activated by a ballast pump in the vessel's technical service space (between the ballast space and the engine room). The ballast pump is also used for the on-deck fire extinguishing system (in the cargo area).

3. The recognized classification society has interpreted paragraph 9.3.2.35.1 to mean that the eductor for the stripping of the ballast tanks of adjoining cargo tanks must be located in the cargo area.

4. The tank vessel company argues that in the case described above, the second indent of paragraph 9.3.2.35.1 is applicable and that the eductor is thus in compliance:

9.3.2.35.1 Bilge and ballast pumps for spaces within the cargo area shall be installed within such area.

This provision does not apply to:

- Double-hull spaces and double bottoms which do not have a common boundary wall with the cargo tanks;
- Cofferdams, double-hull spaces, hold spaces and double bottoms where ballasting is carried out using the piping of the firefighting system in the cargo area and bilge-pumping is performed using eductors.

5. When it considered this question of interpretation, the Dangerous Substances Committee concluded that the wording of this paragraph is unclear and can give rise to misinterpretation.

III. Proposal

6. The Safety Committee is invited to task the working group of recommended classification societies to check whether the wording of ADN paragraph 9.3.2.35.1, on the location of bilge and ballast pumps, is sufficiently clear.

7. The Safety Committee is also invited to task the working group of recommended classification societies with proposing new wording for paragraph 9.3.2.35.1, if necessary.
