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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)****Thirty-fifth session**

Geneva, 26–30 August 2019

Item 4 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN: Other proposals****Corrections to ADN 2019****Transmitted by the Government of Austria\*, \*\*****A. Clarification of the correction to 1.6.7.2.2.2**

1. The transitional provision for 7.2.2.19.4 in 1.6.7.2.2.2, in the “Time limit and comments” column, contains a list of sections, subsections and paragraphs with provisions that must be observed on board vessels in service moving a pushed convoy or side-by-side formation.
2. For new vessels, the provisions are found in 7.2.2.19.3.
3. Section 7.2.2.19.4 contains provisions indicating which devices and equipment may be used on the deck of other vessels of a formation during loading and unloading.
4. These provisions regarding the use of vessels in service were therefore placed in the wrong line in 1.6.7.2.2.2.

**Proposal**

5. In the table in 1.6.7.2.2.2, the text, “Until that date, the following requirements apply to vessels in service:”, in the “Time limit and comments” column for the row covering 7.2.2.19.4, should therefore be moved to the row for 7.2.2.19.3.

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\*\* In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/2018/21/Add.1, (9.3)).



## Consequences and feasibility

6. The requirements applicable to vessels in service remain unchanged; the requirements are just replaced so that they appear in the correct row.

### B. Clarification of the correction to 7.2.3.1.5

7. In accordance with 7.2.3.1.5, a gas detector should be used to verify that the concentration of flammable gases or vapours given off by the cargo is not more than 50% of the LEL, “before any person enters cargo tanks, the residual cargo tanks, the cargo pump-rooms below deck, cofferdams, double-hull spaces, double bottoms, hold spaces or other confined spaces”.

8. In accordance with 7.2.3.1.6, entry into empty cargo tanks, the residual cargo tanks, the cargo pump-rooms below deck, cofferdams, double-hull spaces, double bottoms, hold spaces or other confined spaces is only permitted if the concentration of gases and flammable vapours given off by the cargo is less than 10% of the LEL.

9. This raises the question of why the concentration must be not more than 50% of the LEL before entering, if it is prohibited to enter when the concentration is higher than 10% of the LEL.

10. A comparison of the provisions applicable to dry cargo vessels shows that, in the first provision, in 7.1.3.1.4, only the obligation to take measurements prior to entry is mentioned, while the second provision, in 7.1.3.1.5, sets out the specific permissible gas concentrations, which are identical to those in 7.2.3.1.6.

11. Thus, the limit values in 7.2.3.1.5 are probably the result of an error of transcription from ADN 2017. The content of 7.2.3.1.5 should be aligned with that of 7.1.3.1.4.

## Proposal

Amend 7.2.3.1.5 to read as follows:

“Before any person enters cargo tanks, the residual cargo tanks, the cargo pump-rooms below deck, cofferdams, double-hull spaces, double bottoms, hold spaces or other confined spaces, when dangerous substances of Classes 2, 3, 4.1, 6.1, 8 or 9 for which EX and/or TOX appears in column (18) of Table C of Chapter 3.2, the concentration of gases and flammable and/or toxic vapours shall be measured in the cargo tanks, the residual cargo tanks, the cargo pump-rooms below deck, cofferdams, double-hull spaces, double bottoms or hold spaces.”

## Consequences and feasibility

12. The safety level is not diminished, as only the less restrictive limit values are deleted. There is no change in practice, given that, even under the currently applicable provisions, measurements are probably carried out only once prior to entry.

### C. Clarification of the correction to 7.2.4.16.4

13. Section 7.2.4.16.4 was reproduced unchanged from the previous versions of ADN:

“If the vessel is fitted with a transverse bulkhead according to 9.3.1.25.3, 9.3.2.25.3 or 9.3.3.25.3, the doors in this bulkhead shall be closed during loading and unloading.”

14. As the content of 9.3.x.25.3 was deleted from ADN 2019, the reference to it has become obsolete.

15. In the 2017 version, 9.3.x.25.3 was worded as follows:

“The distance referred to in 9.3.x.25.1 and 9.3.x.25.2 (e) may be reduced to 3.00 m if a transverse bulkhead complying with 9.3.x.10.2 is situated at the end of the cargo area. The openings shall be provided with doors. The following notice shall be displayed on the doors:

**Do not open during loading and unloading without the permission of the master.  
Close immediately.”**

9.3.x.10.2 is worded as follows:

“... This requirement need not be complied with if the wall of the superstructures facing the cargo area extends from one side of the ship to the other and has doors the sills of which have a height of not less than 0.50 m. The height of this wall shall be not less than 2.00 m. ...”

16. Since the use of ships fitted with a transverse bulkhead can continue, and since door closure during loading and unloading contributes significantly to protection against explosion on board these vessels in service, the provision in 7.2.4.16.4 should not be deleted, but its wording should be adapted.

## Proposal

Amend 7.2.4.16.4 to read as follows:

“If the vessel is equipped at the end of the cargo area with a wall that extends from one side of the vessel to the other (a transverse bulkhead) in accordance with 9.3.1.10.2, 9.3.2.10.2 or 9.3.3.10.2 of the version of ADN applicable until 31 December 2018, the doors located in this wall shall be closed during loading and unloading.”

## Consequences and feasibility

17. The amendment reinstates the requirement that was in force until the end of 2018 for vessels already in service. No changes are required on board vessels already in service. If a vessel has been adapted to bring it into compliance with the provisions of the new concept for protection against explosions, this provision is no longer applicable.

### D. Clarification of the correction to 8.2.1.3

18. 8.1.2.1 (f) is worded as follows:

“(f) A certificate concerning the inspection of the fire-extinguishing hoses prescribed in 8.1.6.1 and a certificate concerning the inspection of the special equipment prescribed in 8.1.6.3;”

19. 8.1.2.3 (f) is worded as follows:

“The certificates concerning the inspection of the special equipment, the gas detection systems and the oxygen measuring system prescribed in 8.1.6.3;”

20. The certificate concerning verification of the special equipment referred to in 8.1.6.3 is thus mentioned in both 8.1.2.1 (for all vessels) and 8.1.2.3 (for tank vessels). Since only the documents that must be on board tank vessels in addition to the documents required under 8.1.2.1 should be mentioned, 8.1.2.3 (f) should be changed.

## Proposal

Amend 8.1.2.3 (f) to read as follows:

“The certificates concerning the inspection of the gas detection systems and the oxygen measuring system prescribed in 8.1.6.3;”

## **Consequences**

21. The amendment has no effect on the documents required to be carried on board. The intention is merely to eliminate redundancy.

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