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**Economic Commission for Europe****Inland Transport Committee**

17 July 2019

**Working Party on the Transport of Dangerous Goods**

English

**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 - 29 August 2019

Item 3 e) of the provisional agenda

**Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): matters related to classification societies**

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**ADN 7.2.2.19.3 – Pushed convoys and side-by-side formations (Tanker)****Transmitted by the informal group of Recommended ADN Classification Societies****I. Introduction**

1. At the 17th meeting of the Informal Group of Recommended ADN Classification Societies in March 2019 it has been discussed that some requirements of ADN 2019 for pushed convoys with a tank vessel carrying dangerous goods seems to be wrong or makes no sense for the vessels which are part of a convoy. The following paragraphs were indicated to be discussed: ..., 9.3.3.0.1, 9.3.3.0.3 (d), 9.3.3.0.5, 9.3.3.10.1, 9.3.3.10.2, 9.3.3.10.5, ...
2. Further we find out that there are fundamental problems with the transitional provisions in 1.6.7.2.2 for the paragraph 7.2.2.19.3 for pushed convoys with tank vessels.
3. The Informal Group decided to submit the following proposals to start with a first discussion about the further handling of these points.

**II. Proposal**

4. The required paragraph 9.3.3.0.3 d) in 7.2.2.19.3 does no longer exists in ADN 2019! Proposal: Change the reference in 7.2.2.19.3 in the next version of ADN to “9.3.3.0.3 – last paragraph” because this paragraph has the same content as 9.3.3.0.3 d) in ADN 2017.
5. The Safety committee could discuss how to handle this obviously formal error until a new version of ADN will come into force.
6. The paragraph 9.3.3.10.2 is not applicable to vessels used for propulsion, e.g. push boats, because this paragraph deals with the protective coaming above the cargo tank bulkheads and normally such coaming in accordance with 9.3.3.10.2 cannot be arranged on a push boat, because this area does not exist and the coaming makes no sense at this kind of vessels.  
Proposal: Delete this reference of 9.3.3.10.2 in 7.2.2.19.3 in next version of ADN.

7. The Safety committee could discuss how to handle this reference until a new version of ADN will come into force.

Proposal: It is allowed to ignore this requirement at ADN renewal surveys and a remark will be added at the certificate of approval that this paragraph is not applicable for the vessel.

8. In ADN 2017 the paragraph 9.3.3.10.2 handle with the coaming heights of openings outside the cargo area:

“Outside the cargo area, the lower edges of door-openings in the sidewalls of superstructures and the coaming of access hatches to under-deck spaces shall have a height of not less than 0.50 m above the deck.

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 above the deck. The height of this wall shall be not less than 2.00 m. In this case, the lower edges of door-openings in the sidewalls of superstructures and the coamings of access hatches behind this wall shall have a height of not less than 0.10 m above the deck. The sills of engine room doors and the coamings of its access hatches shall, however, always have a height of not less than 0.50 m.”

A similar paragraph does not exist in ADN 2019, but the above-mentioned requirements are partly contained in paragraph 9.3.3.10.4 of ADN 2019:

“On deck, the lower edges of door-openings in the sidewalls of superstructures and the sills of hatches and ventilation openings of premises located under the deck shall have a height of not less than 0.50 above the deck. This requirement does not apply to access openings to double-hull spaces and double bottoms.”

9. The Safety committee could discuss whether the first paragraph of 9.3.3.10.4 should be used instead of 9.3.3.10.2 in 7.2.2.19.3 in the next version of ADN.

10. In 1.6.7.2.2.2 exists a transitional provision for 7.2.2.19.4 – “Vessels of the formation for which explosion protection is required” but it seems that the content of this transition provision obviously handle with the content of 7.2.2.19.3 – vessels used for propulsion. Proposal: Renumber of the paragraph at the transition provision table into 7.2.2.19.3 and rename the subject to “Vessels for propulsion of the formation for which explosion protection is required”.

11. The content of the transitional provision for 7.2.2.19.4 refers to several paragraphs which have to be fulfilled for vessels in service. We find out that these references are identical with the references for vessels used for propulsion of ADN 2017, but it is not mentioned that the requirements refer to ADN 2017. Therefore, the group is the opinion that the actual paragraphs of ADN 2019 have to be used. This leads partly to the same problems as already described for paragraph 7.2.2.19.4 that some paragraphs do not exist any longer or make no sense for the transitional provision and that therefore in principle no applicable transitional provision for this paragraph is available.

The following paragraphs do not exist any longer in ADN 2019: 9.3.3.0.3 d), 9.3.3.50.1 c), 9.3.3.50.2 and 9.3.3.56.5 and the following paragraphs got a new content and seem to be not the right reference for the transitional provision: 9.3.3.10.2 and 9.3.3.51 Proposal: Add a reference to ADN 2017 in the transitional provision for 7.2.2.19.4 or develop a completely new approach for this transitional provision.

12. The Safety committee could discuss how to handle with a vessel into service which will normally use the transition provision for 7.2.2.19.4.

13. The second part of the transition provision for 7.2.2.19.4 deals with vessels for propulsion which shall be used for tankers of type N open without requested explosion protection.

Proposal: Split the paragraph 7.2.2.19.4 into two rows with the following names for the subjects “Vessels for propulsion of the formation for which explosion protection is required” and “Vessels for propulsion of the formation for which explosion protection is not required”.