
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)****Thirty-sixth session**

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Item 5 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
other proposals**

29 January 2020

English

**Corrections to 7.2.2.19.3 and the transitional provision for
7.2.2.19.3****Based on ECE/TRANS/WP.15/AC.2/2020/17****Transmitted by the Government of Austria**

1. The corrections of 7.2.2.19.3 proposed in paragraph 10 of document 2020/17 have already been adopted and have to be taken into account for ADN 2021.
2. The second paragraph of 7.2.2.19.3 of ADN 2019 is referring to 9.3.3.10.5, “The bulwarks, foot-rails, etc. shall be provided with sufficiently large openings which are located directly above the deck.”
3. The same text was in 9.3.3.10.4 in ADN 2017 and 9.3.3.10.4 was not mentioned in 7.2.2.19.3 in ADN 2017. The Austrian delegation cannot see any reason why it should have been added in 2019.
4. Most probably the reference to 9.3.3.10.5 in ADN 2019 is a typing error and should have read 9.3.3.10.4.
5. As the reference to 9.3.3.10.4 has already been added according to paragraph 10 of 2020/17 in the second paragraph, 9.3.3.10.5 has to be deleted in the first paragraph of 7.2.2.19.3.
6. The last paragraph of 7.2.2.19.3 is referring two times to 9.3.3.10.5. Both references have to be replaced with 9.3.3.10.4. As a result all references to 9.3.3.10.2 of ADN 2017 will be correctly replaced by references to 9.3.3.10.4 in ADN 2021.
7. As already discussed in the last meeting the transitional provision for 7.2.2.19.3 is wrongly placed in the line for 7.2.2.19.4 in ADN 2019. As proposed in document 2020/17 the second part of the transitional provision for 7.2.2.19.4 has to be shifted to the line for 7.2.2.19.3.
8. The corrections of 7.2.2.19.3 have to be taken into account for the transitional provision, too.
 - 9.3.3.0.3 d) has to be replaced with 9.3.3.0.3.1
 - 9.3.3.10.2 has to be replaced with 9.3.3.10.4 (three times).
9. 9.3.3.10.2 of ADN 2017 did not only contain the requirement that can be found in 9.3.3.10.4 of ADN 2019 but also the possibility for an alternative solution with the same level of safety:

“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.”

10. This alternative design does not exist in ADN 2019 and this is fine for new vessels. For existing tank vessels the transitional provision for 9.3.x.10.4 “This requirement may be met by fitting vertical protection walls not less than 0.50 m in height.” is ensuring that the alternative design can still be used until the renewal of the certificate after 31 December 2034.

11. This sentence is missing in the transitional provision for 7.2.2.19.3. That means that we have more stringent regulations for push boats than for tank vessels.

12. The sentence “The requirement of 9.3.3.10.4 may be met by fitting vertical protection walls not less than 0.50 m in height.” has therefore to be added before the last paragraph in the third column of the transitional provision for 7.2.2.19.3.

13. Paragraph 17 of document 2020/17 proposes to delete the second part of the transitional provision for 7.2.2.19.4, because it has to be shifted to 7.2.2.19.3. The Austrian delegation supports this proposal.
