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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)

Twenty-eighth session

Geneva, 25-29 January 2016

Item 5 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN:**Other proposals****ADN 7.2.4.16.9 (b) — Pressure relief of cargo tanks****Transmitted by the Government of Germany¹***Summary*

Executive summary:	<p>7.2.4.16.9 (b) provides that, as part of pressure relief operations, cargo tanks may be opened using, among other things, “another suitable opening in the vapour pipe” [German: Gassammelleitung/French: collecteur de gaz].</p> <p>In ADN 2015, in the German translation, the term “Gassammelleitung” has been replaced by the term “Gasabfuhrleitung”.</p> <p>The English and French versions of ADN have never contained and still do not contain a definition of “vapour pipe”/“collecteur de gaz”.</p> <p>Thus the current requirement does not clearly indicate which is the pipe to use.</p> <p>The German translation differs from the English and French versions in that it omits an important point, namely the need to close openings again.</p>
Action to be taken:	<p>Replace “Gassammelleitung”/“vapour pipe”/“collecteur de gaz” with “venting pipe” in ADN 7.2.4.16.9 (b).</p> <p>Complete the German translation.</p>
Related documents:	<p>ECE/TRANS/WP.15/AC.2/2014/11 and informal document INF.28 (Classification societies) of the twenty-fourth session; ECE/ADN/27.</p>

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Introduction

1. At its twenty-fourth session in January 2014, at the request of the informal group of recommended classification societies, the ADN Safety Committee agreed to numerous amendments for ADN 2015 relating to the specification of the vessel and shore piping to be used to evacuate gas during loading and unloading.

2. ADN 7.2.4.16.9, which uses the terms “Gassammelleitung”/“vapour pipe”/“collecteur de gaz” (which are not, or are no longer, used in ADN 2015), was passed over in making these amendments.

3. The German translation of 7.2.4.16.9 (b) differs from the English and French language versions of ADN 2015 in one point of importance to safety: it does not mention the obligation to ensure that the openings used for pressure relief are appropriately closed again after loading or unloading.

Proposed amendment

(Deletions in ~~strike through~~, new text underlined)

4. Amend paragraph 7.2.4.16.9 (b) to read as follows:

“b) Beim Laden oder Löschen von Stoffen, für die in Kapitel 3.2 Tabelle C Spalte (6) und 7 ein Typ N offen gefordert wird, dürfen bei einem geschlossenen Tankschiff die Ladetanks mittels der in Absatz 9.3.2.22.4 a) oder 9.3.3.22.4 a) genannten Einrichtung zum gefahrlosen Entspannen der Ladetanks oder über eine andere geeignete Öffnung der ~~Gassammelleitung~~ Gasabfuhrleitung geöffnet werden. ~~Diese Öffnung muss so gebaut sein, dass wenn~~ jede Ansammlung von Wasser und dessen Eindringen in die Ladetanks verhindert wird und die Öffnung nach dem Laden oder Löschen [ordnungsgemäß] verschlossen wird.

(b) During loading or unloading in a closed tank vessel of substances for which an open type N vessel is sufficient according to columns (6) and (7) of Table C of Chapter 3.2, the cargo tanks may be opened using the safe pressure-relief device referred to in 9.3.2.22.4 (a) or 9.3.3.22.4 (a) or using another suitable opening in the ~~vapour pipe~~ venting piping if any accumulation of water and its penetration into the cargo tanks is prevented and the opening is appropriately closed again after loading or unloading.

b) Pendant le chargement ou le déchargement de matières dans un bateau-citerne fermé, pour lesquelles aux colonnes (6) et (7) du tableau C du chapitre 3.2 un type N ouvert suffit, les citernes à cargaison peuvent être ouvertes au moyen du dispositif permettant de décompresser sans danger, visé au 9.3.2.22.4 a) ou au 9.3.3.22.4 a) ou par une autre ouverture appropriée ~~du collecteur de gaz de la conduite d'évacuation de gaz~~ si des dispositions sont prises pour empêcher toute accumulation d'eau et sa pénétration dans la citerne à cargaison et si l'ouverture est refermée comme il convient après le chargement ou le déchargement.”

Justification

5. Because of the divergence from the definitions contained in ADN 1.2.1 it is not clear which pipe is being referred to here. This could lead to misunderstandings with important safety implications during loading and unloading operations and could even result in the wrong openings being used for pressure relief for cargo tanks.

6. The use of terms for ships' fittings must be identical and consistent throughout ADN.

7. The substantive divergence of the German translation of 7.4.2.16.9 (b) of ADN 2015 could lead the users of that language version to perform procedures incorrectly, which in turn could give rise to the uncontrolled release of toxic or explosive vapour/gas from the cargo tank, or the penetration of water into the cargo tanks during the vessel's next voyage.

8. The sentence is worded as a rule for construction, but Part 7 contains operational instructions on the measures to be taken during loading, unloading, carriage and other handling of cargo. The requirement should be worded accordingly.

9. The various language versions of ADN must be identical in terms of content.

Safety

10. Transport safety is maintained and improved.

Implementation

11. ADN 7.2.4.16.9 (b) is a purely operational instruction for loading and unloading and, as such, requires no investment. The changes to be made to bring operating procedures into line with the paragraph as amended can be flagged at the latest during staff training or expert certificate renewal courses.
