
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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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)

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Item 4 (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

Interpretation of intermediate survey and inspection of documents 8.1.7.2

Submitted by EBU and ESO

I. Introduction

1. During the pre-consultation meetings with the members of EBU/ESO and her stakeholders, an interpretation of ADN 8.1.7.2 was dropped, which seems to notify a possible unclarity. The text of 8.1.7.2 has been adapted in the ADN-2019, the care of inspection of autonomous protective systems has been added to 8.1.7.2.
2. For 8.1.2.7 a transitional provision is applicable for N.R.M. from 1 January 2019 and after renewal of the Certificate of Approval after 31 December 2020.

8.1.7.2 current text:

8.1.7.2 Installations and equipment intended for use in explosion hazardous areas, "limited explosion risk" type equipment, installations and equipment complying with 9.3.1.51, 9.3.2.51 and 9.3.3.51 and autonomous protective systems

*Such installations, equipment and autonomous protective systems and their compliance with the documents referred to in 8.1.2.2 (e) to (h) or 8.1.2.3 (r) to (v) **in respect of the situation on board** shall be **inspected** whenever the certificate of approval is renewed and, in addition, within the third year from the date of issue of the certificate of approval, by a person authorized for this purpose by the classification society that classified the vessel or by the competent authority. A certificate concerning this inspection shall be carried on board.*

II. Practise – difference of survey and intermediate survey

3. This intermediate survey is usually held on 1 day, on a random location, while the barge is not necessary to be taken out of operations, to be empty or cleaned and takes maximum 1-day time. The electrical installations and autonomous protective systems have always been inspected visually -only- in the third year as part of the intermediate Survey.
4. Class renewal is a big event, which takes at least 1 week to sometimes even 5 weeks of survey and necessary adaptations, while the barge is first made gas-free, foreseen of a gas free certificate and taken out of the water at a shipyard.
5. The autonomous protective systems than, are disconnected from the pipeline systems and tank systems, cleaned and tested in a workshop, under supervision of the Class surveyor.

III. Interpretation of “inspected”

6. EBU/ESO is convinced that this “inspection” in the third year (“intermediate survey”) is to be meant to be as a visible inspection, next to electrical systems also for the autonomous protective systems, to be carried out by a Class surveyor. EBU/ESO is convinced that the adaption in ADN 8.1.2 in 2019 was not meant to change the instructions to Class Societies to increase the gravity of the intermediate survey, because:

- Chapter 8.1.2 is about “Documents”;
- During the meetings in Geneve there was not spoken about more intensive inspections but about expanding the scope of the inspection of the situation on board, in line with the new documents such as a drawing and a list; the installations/systems and their compliance with the documents (list or general plan according to ADN 8.1.2.3 r-u). There is not any need known, to increase the physical inspection schedule of autonomic protection systems.

7. A class society has interpreted this inspection to be as rigorous inspection which takes place during the 5-yearly Survey; renewal of class.

IV. Question & Proposal

8. EBU/ESO asks the Safety Committee to discuss this topic and provide her view of interpretation.

9. Any discussion could be solved by adapting the text as following:

“Such installations, equipment and autonomous protective systems and their compliance with the documents referred to in 8.1.2.2 (e) to (h) or 8.1.2.3 (r) to (v) in respect of the situation on board shall be inspected whenever the certificate of approval is renewed and, in addition, within the third year from the date of issue of the certificate of approval, ***inspected visually*** by a person authorized for this purpose by the classification society that classified the vessel or by the competent authority. A certificate concerning this inspection shall be carried on board.”
