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|  | **INF.17** | |
| **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-eighth session**  Geneva, 23–27 August 2021  Item 3 (b) of the provisional agenda  **Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN):**  **special authorizations, derogations and equivalents** | | 19 August 2021 English |

Request for recommendation for Invotis IX on the basis of 9.1.0.40.2.16 – Fixed fire-extinguishing system for physical protection

Transmitted by the Government of the Netherlands

**Introduction**

1. According to ADN section 9.1.0.40.2.16, physical protection by permanently fixed fire-extinguishing systems in the engine rooms, boiler rooms and pump rooms are accepted solely on the basis of recommendations by the Administrative Committee.

2. ES-TRIN 2021 is amended to allow for fire-extinguishing installations protecting objects under Article 10.11, sub 17, a, second option (relevant text underlined):

17. Rooms in which lithium-ion accumulators are stored shall comply with the following requirements:

(a) These rooms shall be protected against fire of one or several lithium-ion accumulators on the basis of a fire protection concept developed by an expert

i) having regard to the other equipment located in the same room,

ii) having regard to instructions of the manufacturer of the lithium-ion accumulators,

iii) including provisions for alarm systems.

A fire protection concept may be dispensed with if the lithium-ion accumulators are stored in a fireproof enclosure, which is equipped

i) with at least one monitoring device (fire and thermal runaway) and

ii) by derogation from article 13.06, with one suitable fixed fire-extinguishing installation for protecting objects.

(b) In the case referred to in (a) first sentence, these rooms shall be shielded with A60 partitions.

(c) These rooms or the lithium-ion accumulators housed in a fireproof enclosure shall be mechanically ventilated to the open deck. The exhaust outlet of the ventilation shall be located in such a way that the safety of persons on board is not endangered. These requirements do not apply if the cumulative capacity of the lithium-ion accumulators in the room is below 20 kWh.

3. As a consequence, an exception to the current art. 13.06 ES-TRIN, prohibiting permanently installed firefighting systems for protecting objects, is introduced in ES-TRIN. It seems that the prohibition of art. 13.06 ES-TRIN and 9.1.0.40.2.16 ADN were related.

4. The Dutch delegation has received a request for a recommendation pursuant 9.1.0.40.2.16, and intents to request that recommendation at the next session of the ADN Safety Committee. The requirements of the derogation will be similar to the ES-TRIN requirements (above) which will enter into force on 1 January 2022, taking into account the conclusion from the Group of Recommended ADN Classification Societies in its latest report (Point III, e from ECE/TRANS/WP.15/AC.2/2021/18)

5. However, if a recommendation is granted by the ADN Administrative Committee, the provisions regarding fixed fire-extinguisher systems for lithium-ion accumulators stored in fireproof enclosures should also be incorporated into ADN.

6. Alternatively, the Safety Committee could discuss whether it is still relevant to incorporate entire sections of ES-TRIN Articles into the ADN. The annex to Resolution 61 is regularly harmonized with ES-TRIN by the work of the “Working Party on the Standardization of Technical and Safety Requirements in Inland Navigation”(SC.3/WP.3). If the Safety Committee should come to the conclusion that the inclusion of provisions for fixed fire-extinguisher installations is no longer relevant in ADN, the Dutch delegation is willing to coordinate the work to remove these provisions.

**Action to be taken**

7. The Dutch delegation requests the Safety Committee to discuss the above considerations in paragraphs 4, 5 and 6 and to take action as it deems appropriate.