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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)**

**Thirty-ninth session**

Geneva, 24–28 January 2022

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 9.3.x.12.2****Transmitted by the Recommended ADN Classification Societies\*\*\****Summary***Related decisions:**

Paragraph 21 of the report of the thirty-fifth session of the ADN Safety Committee (ECE/TRANS/WP.15/AC.2/72) reads:

“21. On the interpretation of 9.3.3.12.2, the Safety Committee, subject a final review by the Recommended ADN Classification Societies at the next session, concluded that:

- Ventilation systems did not strictly mean active systems, it was therefore not necessary to install fans;
- Yes, hatch covers can be used as an appropriate “ventilation system”;
- Yes, a goose neck is an appropriate “ventilation system”;
- Yes, two appropriately positioned ventilation openings (e.g. ventilation hoods) per room are appropriate “ventilations systems”;

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\*\* In accordance with the programme of work of the Inland Transport Committee for 2021 as outlined in proposed programme budget for 2021 (A/75/6 (Sect.20) para 20.51).



- No, it is not necessary to install flame arresters in the ventilation openings of tank vessels of type N open with flame arresters and type N closed.”

**Related documents:**

Informal documents INF.28 (Austria) of the thirty-fifth session and INF.9 (Recommended ADN Classification Societies) of the thirty-sixth session.

## Introduction

1. At the thirty-fifth session of the ADN Safety Committee, informal document INF.28 was discussed, and the Safety Committee agreed on a number of interpretations and asked the Group of Recommended ADN Classification Societies to review these interpretations at their next meeting.
2. The Recommended ADN Classification Societies discussed these interpretations at their eighteenth meeting with the result that the group has reservations to follow the interpretation of the ADN Safety Committee under second bullet point that "... hatch covers can be used as an appropriate "ventilation system" ", because:
  - the class rules require a ventilation pipe for void spaces and
  - an opened hatch cover is an undefined opening (situation) with respect to stability calculations.
3. On its twentieth meeting, the Group of Recommended ADN Classification Societies has discussed and developed document ECE/TRANS/WP.15/AC.2/2021/10 (13 November 2020), with interpretation of 9.3.3.12.2 which was sent to the ADN Safety Committee without any changes.
4. On its thirty-eighth session, the ADN Safety Committee again requested that the Recommended ADN Classification Societies presented, in a working document for the January 2022 session, any necessary amendments to clarify the text of ADN.

## Proposal

5. The Group of Recommended ADN Classification Societies therefore asks the Safety Committee to reconsider its interpretation of hatch covers as ventilation system and, if possible, to delete this item from the list of agreed interpretations to 9.3.x.12.2.
6. There is no need for amending transitional provisions.
7. The final proposed text of interpretation is:
  - "Ventilation systems did not strictly mean active systems, it was therefore not necessary to install fans;
  - The class rules require a ventilation pipe for void spaces;
  - An opened hatch cover is an undefined opening (situation) with respect to stability calculations and cannot be consider as appropriate solution for ventilation of void spaces;
  - Two appropriately positioned ventilation openings with regard to stability requirement (e.g. ventilation hoods) per room are appropriate "ventilations systems";
  - A goose neck is an appropriate "ventilation system";
  - It is not necessary to install flame arresters in the ventilation openings of tank vessels of type N open with flame arresters and type N closed.”