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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-ninth session**  Geneva, 24–28 January 2022  Item 5 (b) of the provisional agenda  **Proposals for amendments to the Regulations annexed to ADN:**  **other proposals** | 21 January 2022  English |

Additional information to ECE/TRANS/WP.15/AC.2/2022/16; EBU/ESO proposal of cofferdams.

Transmitted by European Barge Union (EBU) and European Skippers Organisation (ESO)

Introduction

1. During the pre-consultations and preparations some questions have been arising and a mistake in the proposal regarding the cofferdams has been noticed.

2. EBU/ESO would like to clear the following and asks the chairman of the ADN Safety Committee to take this additional INF-document within the discussion of working document ECE/TRANS/WP.15/AC.2/2022/16.working document.

Mistake

3. Accidentally, a mistake has occurred in the document under 3b, “Proposal” for which we apologize. In our document will be read that we propose only to ballast when cargo tanks are empty, which has not been our purpose.

Clarification

4. Besides we have noticed it would be better to adapt the proposed inspection intervals of cofferdams under 3a into 4 weeks instead of “monthly” to make proposed instructions stricter and more clear.

Amended proposed text of ECE/TRANS/WP.15/AC.2/2022/16

5. Hereby we propose to use the following text during the discussion of ECE/TRANS/WP.15/AC.2/2022/16, text below to be used instead of the text of the working document:

6. New text of 3a and 3b, to be read in ECE/TRANS/WP.15/AC.2/2022/16, changes marked **underlined and bold**, deleted text ~~stricken through~~.

*(a) Amend the sentence of ADN 7.2.3.1.1:*

**"7.2.3.1 *Access to cargo tanks, residual cargo tanks, cargo pump-rooms below deck, cofferdams, double-hull spaces, double bottoms and hold spaces; inspections***

7.2.3.1.1 The cofferdams shall be empty***,* as long as the adjacent cargo tanks are filled**.They shall be **inspected frequently, at least each 4 weeks** ~~once a day~~ in order to ascertain that they are dry (except for condensation water)."

*(b) Reformulate ADN 7.2.3.20 by deleting the first word and adding "Cofferdams, not fitted out as service spaces " in the second sentence:*

**"7.2.3.20 *Water ballast***

7.2.3.20.1 Cofferdams**, fitted out as a service space,** and hold spaces containing insulated cargo tanks shall not be filled with water.

**Cofferdams, not fitted out as a service space, d**~~D~~ouble-hull spaces, double bottoms and hold spaces which do not contain insulated cargo tanks may be filled with ballast water provided:

- this has been taken into account in the intact and damage stability calculations; and

- the filling is not prohibited in column (20) of Table C of Chapter 3.2."

[… ]

Additional information regarding transitional provisions as mentioned in ADN 1.6.7.1.2;

7. When in the general transitional provisions in 1.6.7.2 no date is specified after “N.R.M.”, it refers to N.R.M. after 26 May 2000. (This is the case of the transitional provisions of 7.2.3.20.1, here to is referred in ECE/TRANS/WP.15/AC.2/2022/16under 2 b).