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**Economic Commission for Europe**

Inland Transport Committee

27 January 2022

**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)**

English

**Thirty-ninth session**

Geneva, 24–28 January 2022

Item 8 of the provisional agenda

**Any other business**

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**Comments on ECE/TRANS/WP.15/AC.2/2022/14; Loading and unloading instructions — draft terms of reference for the informal working group, transmitted by the Government of the Netherlands.****Transmitted by the Government of Belgium****Introduction**

1. The Belgian delegation wishes to thank the Dutch delegation for the terms of reference proposed in document ECE/TRANS/WP.15/AC.2/2022/14 and agrees to handle this issue in an informal working group.
2. However, the Belgian delegation have discussed the document ECE/TRANS/WP.15/AC.2/2022/14 with some experts and with the inland waterway platform in Belgium and they have expressed some concerns related to the loading and unloading instructions as already discussed in previous meetings.

**Observations**

3. It must be said that the word “Loading Instruction” is quoted in different prescriptions of the ADN, but with a completely different meaning or context. In our opinion, it is advisable, to first clearly separate and rename the different rules in order to avoid further confusion. This error occurs in the various ADN languages!
4. Number 7.2.4.16.15 reads as follows: “The initial cargo throughput established in the loading instructions shall be such as to ensure that no electrostatic charge exists at the start of loading.”
5. The word “loading instruction” should be replaced as a matter of urgency by “loading agreement”, with a clear reference to the ADN checklist as set out in section 8.6.3, page 2 at the top, where you can find the loading and unloading rate.
6. The relevant paragraph 7.2.4.16.15 should then read as follows: “The initial cargo throughput established in the loading agreement shall be such as to ensure that any possible electrostatic charge or discharge exists at the start of loading.”
7. ISGINTT gives very clear guidelines here and the question is if these guidelines should belong to a technical ADN regulation.
8. It should be clear that paragraph 7.2.4.16.16 is not related to the ship’s loading and unloading instructions as referred to in section 9.3.2(3).25.9. Moreover, it is totally wrong to

make a link between product depending on operational matters and the ship's construction regulations.

## **Conclusion**

9. The Belgian delegation considers the check about the meaning or context of the loading instructions as a part of “the review on the current status of the Loading and unloading instructions in ADN” as described in letter (a) of the terms of reference. If not, the Belgian delegation would like to suggest adding the check about the meaning or context of the loading instructions to the terms of reference or take this up in the report of this meeting.

Furthermore, the Belgian delegation would like to take the ISGINTT guidelines into account during the work of the informal working group.

10. Therefore, the Belgian delegation wants to assure that the concerns of the Belgian inland waterway platform are addressed in the informal working group.

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