
Economic Commission for Europe**Inland Transport Committee**

19 August 2022

Working Party on the Transport of Dangerous Goods

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)**Fortieth session**

Geneva, 22-26 August 2022

Item 4 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN: other proposals

**Comments on document ECE/TRANS/WP.15/AC.2/2022/43:
7.2.4.22 of ADN: Opening of openings****Submitted by the Government of Belgium****Introduction**

1. This informal document contains some comments on document ECE/TRANS/WP.15/AC.2/2022/43, submitted by the Government of Germany and distributed on 9 June 2022.

2. Since the opening of openings is a difficult subject, the Belgian delegation has three general remarks on this subject:

- (1) The proposal transmitted by Germany gives a clear picture of what is allowed and what is not, and in any case, this is an improvement of the current text under 7.2.4.22. After all, in the ADN 2019, the text of 7.2.4.22 and specifically 7.2.4.22.5 was amended in a rather unfortunate manner. The consequence of this amendment was that if something has to be opened for qualitative or quantitative reasons, this has become strictly impossible by the amended text.
- (2) The Belgian industry is of the opinion that for very dangerous substances the opening of loaden cargo tanks is “not done”. Therefore, the Belgian delegation proposes some additional words “or in case of special instructions provided in written by the shipper to the carrier or master of the vessel” in 7.2.4.22.1. (see paragraph 6 of this informal document)
- (3) The industry also refers to maritime regulation where sampling on seagoing vessels is less difficult regulated than in ADN. However, maritime solutions may be more expensive for inland waterway vessels and therefore not economically profitable. The Belgian delegation leaves this discussion open to the ADN Safety Committee.

Proposal for amendments

3. The Belgian delegation proposes that each time the wordings “a visual inspection” or “visual inspection” are mentioned, the words “from deck level” should be added. E.g., in the summary:

“In order to be able to perform a visual inspection **from deck level** of cargo tanks that are not degassed to prevent contamination of the cargo prior to loading, or after unloading, or to check whether cargo tanks are empty, it is necessary to open the sampling opening of the cargo tank, an equivalent opening or the housing of a flame arrester of a cargo tank prior to loading or after unloading.”

4. In document ECE/TRANS/WP.15/AC.2/2022/43, paragraph 10 the flame arrester should be installed at the outlet end of the hose and not “preceding the hose”. The Belgian delegation proposes to amend the text to be inserted after the first sentence of 7.2.3.7.1.3 to read as follows (new text is underlined, deleted text is strikethrough):

“The gas/air mixture may be removed from the cargo tanks through the device for the safe depressurization of cargo tanks as referred to in 9.3.2.22.4 (a) and 9.3.2.22.4 (b) or 9.3.3.22.4 (a) and 9.3.3.22.4 (b), through the sampling opening (9.3.2.21.1 (g) or 9.3.3.21.1 (g)) or through the open housing of the flame arrester at the connection of the cargo tank and the venting piping (9.3.2.22.4 (b) or 9.3.3.22.4 (d)).

The gas/air mixture may also be removed through a suitable hose that is connected to the venting piping and equipped with a flame arrester ~~preceding the hose~~ **at the outlet end of the hose** (explosion group/subgroup according to column (16) of Table C of Chapter 3.2).”

5. In document ECE/TRANS/WP.15/AC.2/2022/43, paragraph 11, the first sentence of 7.2.4.22.1 implies that 7.2.4.22 and 7.2.4.23 shall only apply to “empty tanks”. The prescriptions in 7.2.4.22.3 and 7.2.4.22.6, supposing the presence of a substance in the tanks, are in contradiction with the first sentence of 7.2.4.22.1.

6. The Belgian delegation cannot provide an unambiguous solution for this inconvenience. The first sentence of 7.2.4.22.1 could be deleted or if we follow the idea that tank vessels of type G are excluded, we can amend the first sentence accordingly.

7. We propose to amend the text of 7.2.4.22.1 to read as follows (new text is underlined, deleted text is strikethrough):

“7.2.4.22 and 7.2.4.23 shall only apply to tank vessels **of Type C and Type N that have unloaded goods of Classes 3, 4.1, 5.1, 6.1, 8 or 9 or intend to load such goods.**

By derogation from 7.2.3.22, the opening of openings is permitted under the following conditions for cleaning and/or replacing the flame arrester plate stack, visual inspection **from deck level**, sampling, gas measurement, determining the filling quantity in the cargo tank in exceptional cases and subsequently adding stabilizer in exceptional cases but only if and insofar it is not prohibited on the basis of other legal requirements **or in case of special instructions provided in written by the shipper to the carrier or master of the vessel.**

Action to be taken

8. The Safety Committee is invited to consider the amendments proposed in paragraphs 4, 5, and 6 above and to take action as it deems appropriate.
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