
Economic Commission for Europe

Inland Transport Committee

22 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 (a) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN: work of the RID/ADR/ADN Joint Meeting

Comments on document ECE/ADN/61 — Correction of a previous decision

Submitted by the Government of Belgium

Introduction

1. Document ECE/ADN/61 contains the requested consolidated list of amendments to the Regulations annexed to ADN adopted by the Administrative Committee at its twenty-seventh session. The second amendment for chapter 2.4 on page 13 of document ECE/ADN/61 reads as follows:

“2.4.4.3.4 (a) After (i), add a new note to read as follows:

“NOTE: *In this situation, when EC_x or NOEC of the tested mixture ≥ 0.1 mg/L, there is no need to classify for long-term hazard under ADN.”*

2. This note has been introduced with proposals of harmonization from the RID/ADR/ADN Joint Meeting with the twenty-second revised edition of the United Nations Recommendations on the Transport of Dangerous Goods, contained in ECE/TRANS/WP.15/AC.1/2021/24 and Add.1.

3. This document has already been accepted by a decision notified during the thirty-eighth session.

4. Nevertheless, a contradiction has been discovered with the prescriptions below for carriage in tank vessels of substances which meet the criteria to be classified as environmentally hazardous:

“2.4.3.1 The following substances shall be considered to be environmentally hazardous (aquatic environment):

- (a) For carriage in packages, substances which meet the criteria for Acute 1, Chronic 1 or Chronic 2, according to table 2.4.3.1 below; and
- (b) **For carriage in tank vessels, substances which meet the criteria for Acute 1, Acute 2 or Acute 3, or Chronic 1, Chronic 2 or Chronic 3, according to table 2.4.3.1 below.”**

5. The table under 2.4.3.1 stipulates values up to 100mg/l for acute aquatic hazards and up to 100mg/l for substances for which adequate chronic toxicity data are not available.

I. Proposal

6. Proposal 1: Do not add this note to the version 2023 of the ADN. As we know this note cannot be justified for substances which should be classified as dangerous goods when carried in tank vessels but are not classified as such according to the note. When no decision can be taken in the 40th session of the ADN the note should be left out of the version 2023.

7. Proposal 2: Amend the note as follows:

2.4.4.3.4 (a) After (i), add a new note to read as follows:

“NOTE: In this situation, when ECx or NOEC of the tested mixture > 100 mg/l, there is no need to classify for long-term hazard under ADN.”

since 100 mg/l is the limit for classification of substances for which adequate chronic toxicity data are not available.

II. Action to be taken

6. The Safety Committee is invited to consider the amendments proposed in paragraphs 4 and 5 above, to choose between proposal 1 and proposal 2 and to take action as it deems appropriate.
