

**Economic Commission for Europe**

**Inland Transport Committee**

14 December 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)**

**Forty-first session**

Geneva, 23-27 January 2023

Item 6 of the provisional agenda

**Reports of informal working groups**

**Correspondence group on fumigated cargo**

**State of discussions**

**Submitted by the Government of Germany**

*Summary*

**Related documents:** ECE/TRANS/WP.15/AC.2/2022/42 (Germany)  
 Informal document INF.16 of the fortieth session (Netherlands)  
 ECE/TRANS/WP.15/AC.2/82, paragraphs 66 and 67

**Introduction**

1. In a second round of consultations immediately after the fortieth session of the ADN Safety Committee, the members of the correspondence group – Austria, France, Germany (Chair), the Netherlands, European Barge Union/ European Skippers Organization (EBU/ESO) and Grain and Feed Trade Association (GAFTA) – discussed the existing challenges and possible solutions regarding the carriage of fumigated cargo. The discussion focussed on batches of grain and animal feed loaded from sea-going vessels or trains onto inland waterway vessels for onward carriage.

2. There is incomplete data on the following incidents:

<i>Country</i>	<i>Month/Year</i>	<i>Situation</i>	<i>Injuries</i>
Netherlands	12/2019	<b>Cargo transfer of fumigated cargo from Sea going vessel to 17 inland vessels</b>  Cargo: sunflower groats / animal feed  Fumigant: Phosphine	Documentation of poisoning of several crew members on board of at least 1 inland vessel

<i>Country</i>	<i>Month/Year</i>	<i>Situation</i>	<i>Injuries</i>
Netherlands	12/2019	<p><b>Two persons had become unwell on board a vessel.</b></p> <p>Measurements showed high concentration of Phosphine / 14 ppm / in cargo holds of a vessel</p> <p>Origin and sort of cargo unknown.</p>	Two persons had become unwell on board a vessel.
Netherlands	07/2021	<p><b>Cargo transfer of "Cattle feed" from vessels to land based silos</b></p> <p>Vessels received cargo from Railway wagons, coming from Poland and passing through Germany</p> <p>The phosphine was first detected in the afternoon around 13:00 by an employee of the feed company who was wearing a gas detector on his body.</p> <p>Measurements in the silos and on the vessel</p> <p>Concentration of Phosphine higher in the silo than on the vessel.</p>	unknown
Germany	2017	<p><b>Unloading Corn and rapeseed from a vessel to land storage</b></p> <p>Origin of cargo: Hungary</p> <p>Significant concentration of Phosphine in the cargo hold of the vessel</p>	<p>None</p> <p>Duly Safeguard</p>
Austria	2022?	<p><b>Cargo transfer of fumigated grain in to an inland vessel on the Danube River</b></p> <p>Origin of Cargo: Seagoing vessel, where fumigation took place</p> <p>Alarm was triggered in wheelhouse or accommodation</p>	Not known

3. The majority of the group members were in favour of:
- (a) Including an identification number 90X for "fumigated cargo" in the table in ADN. The challenge here lies in giving an exhaustive description of all goods (beyond grain and animal feed) that could be carried under fumigation;
  - (b) Considering asphyxiant fumigants such as carbon dioxide in addition to toxic fumigants;
  - (c) Including a definition of "fumigated cargo" in section 1.2.1 of ADN;

(d) Prohibiting the carriage of newly fumigated cargo that still releases a significant amount of toxic gases and vapours or asphyxiant gas as well as prohibiting the active fumigation of cargo directly in inland waterway vessels;

(e) Only permitting the carriage of previously fumigated cargo where the concentration of certain fumigants is below threshold values to be determined;

(f) Possibly determining certain safety measures to be taken on board the vessels for the permitted transport operations. This is to take account of the possibility that cargo already measured and found complying with the threshold values still releases residual amounts of fumigant during a longer journey. In these cases, the possibility to halt the transport operation should be considered;

(g) Not laying down rules for construction such as gas-tight cargo hold covers and not requiring an ADN certificate for vessels carrying such cargo and an expert (ADN).

4. However, the EBU/ESO delegation advocated regulating the carriage of fumigated bulk cargo outside of ADN. The carriage of fumigated bulk cargoes with emissions measured below the established thresholds should not be regulated in ADN.

5. The delegation of the Netherlands agreed to draw up a new proposal that considers these aspects. However, there were differing ideas on how to include the provisions in ADN: as an independent subsection in Part 5 or 7 or as a special provision to the corresponding entry in Table A.

6. The correspondence group would like to ask the Safety Committee to give feedback on the previous work results and to advise the correspondence group on what direction the group's work should take. The group intends to submit a fleshed-out proposal for amendment for the forty-second session.

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