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# Economic and Social Council

Inland Transport Committee

28 December 2022

**Working Party on the Transport of Dangerous Goods**

Original: 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 4 (c) of the provisional agenda

**Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): interpretation of the Regulations annexed to ADN**

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## **Proposal regarding inconsistency in two comparable positions UN 3295**

**Transmitted by the European Barge Union and the European Skippers Organization (EBU/ESO)**

### **Introduction**

1. It is observed that within Table C, two positions of *UN 3295 Hydrocarbons, liquid, N.O.S., containing isoprene and pentadiene, stabilized*, with likewise characteristics and the only difference of required explosion (sub-) group in column 16, in column 18 different required equipment required is shown.
2. This issue is suspected to be an editorial inconsistency as the second, "double" positions were added to the ADN in the 2019 version, when special remark "44" of column 20 was introduced.
3. The purpose then, was to be able to carry the product in barges equipped with IIB-3 autonomous protection systems, if verified data were made available. The required data in both positions should be exactly the same, except for the data mentioned in column 16 (explosion group) and thus, remark "44" in column 20.

### **I. Problem**

4. The issue could raise safety implications when the required equipment ("EP" and "TOX") is not required. CMR is present in both positions and therefore it is required to add "TOX" and "EP" to column 18 of the 2<sup>nd</sup> position as well (and in line with ADN 3.2.3.3.).
5. By this notification, f.e. the wearing of breathing apparatus during connecting/disconnecting of loading arms is guaranteed (ADN 7.2.4.16.8). The same goes for the escape device available for each person on board.

## **II. Proposal**

6. EBU/ESO would like to ask the opinion of the Safety Committee regarding the proposal to consistently align both positions for the use of required equipment equally, based on the "safest" position, requiring equipment: PP, EP, EX, TOX, and for this position.

## Appendix

### Positions UN 3295

3295	HYDROCARBONS, LIQUID, N.O.S. CONTAINING ISOPRENE AND PENTADIENE, STABILIZED	3	F1	I	3+inst.+ N2+CM R	C	2	2	3	50	95	0,678	1	yes	T4 <sup>3)</sup>	II B <sup>4)</sup>	yes	PP, EP, EX, TOX, A	1	3
3295	HYDROCARBONS, LIQUID, N.O.S. CONTAINING ISOPRENE AND PENTADIENE, STABILIZED	3	F1	I	3+inst.+ N2+CM R	C	2	2	3	50	95	0,678	1	yes	T4 <sup>3)</sup>	II B <sup>4)</sup> (II B3)	yes	PP, EX, A	1	3; 44