
Economic and Social Council

Inland Transport Committee

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Working Party on the Transport of Dangerous Goods

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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

Gas return pipe – Exemption permissions

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

Introduction

1. EBU/ESO were recently informed of an exemption permission for the requirement of using a gas return pipe within an ADN contracting state. in case of loading UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (HEAVY HEATING OIL). At this specific terminal it was allowed to load the mentioned substance during 2022 without vapour return piping; recently this exception was renewed/extended for another period of 1 year.

I. Problem

2. EBU/ESO are of the opinion that crewmembers are unnecessarily exposed to dangerous gas/air mixtures during the loading process. Also, another given exemption, after multiple MA's were issued, is not in the spirit of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways.

II. A short history of derogations

3. The decision of the requirement to carry UN 3082 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (HEAVY HEATING OIL) in a closed barge type N 2 3 came into effect in ADN 2013. By this, also ADN 7.2.4.25.5, in which a vapour return piping is required for the mentioned substance, came into effect for this substance, in ADN 2013. Since then, the following derogations were given by means of Multilateral Agreements (MA):

- In 2012: MA 004 – derogation period: till 31-12-2014
- In 2012: MA 005 – derogation period: till 31-12-2016
- In 2016: MA 019 - derogation period: till 31-12-2021

4. Summarized, loading facilities were given a period of 9 years to make technical adjustments to their systems. **Note:** in 2011 it was already decided that this type of substance need to be carried by a closed type vessel.

III. Request

5. EBU/ESO, hereby wants to raise awareness for this issue of unsafe loading and would like to ask the delegations if there are more loading facilities within the ADN contracting area that were given exemptions from the mentioned ADN article.
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