



Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods**

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)

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Item 1 of the provisional agenda

Item 4 (b) of the provisional agenda

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

Maximum contents (as mentioned in 7.2.4.1.1 of ADN) of cargo samples on board of "supply vessels or other vessels delivering products for the operation of vessels" (as mentioned in 7.2.4.1.3 and 7.2.4.1.4 of ADN)

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

Introduction

1. In seaports, many ADN vessels of type N 2.3 and type C 2.2 deliver marine fuels to seagoing vessels. The marine fuel supplied to these vessels must meet global legal requirements (provisions of the International Convention for the Prevention of Pollution from Ships (MARPOL), Annex VI, Chapter 3, Regulations 14 and 18, content of sulphur oxides and fuel oil quality). To meet these provisions, representative samples of delivered marine fuel must be taken and retained on board of these supply vessels, or other vessels delivering products for the operation of vessels (as mentioned in 7.2.4.1.3 and 7.2.4.1.4 of ADN).

2. The procedure of sampling of the above-mentioned regulations has been set out in standard ISO 13739:2020 – Procedures for the transfer of bunkers to vessels. Suppliers, clients, buyers and surveyors implemented these procedures in their procedures and supply, take, and retain representative samples of the marine fuel oil delivered. Port authorities are obliged to check that these procedures are being followed and they use the International Maritime Organization Port State Control (PSC) system to fulfil this need.

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** A/77/6 (Sect. 20), table 20.6.

3. In 7.2.4.1.1 of ADN ("Limitation of the quantities carried") the maximum contents of cargo samples is described as 500 ml per receptacles. However, the limitation to 500 ml is not aligned with current requirements, which are based on standard ISO 13739:2020 - Procedures for the transfer of bunkers to vessels, for supply vessels of fuels (bunker vessels). In practice, on board of supply vessels or other vessels delivering products for the operation of vessels, samples taken and left on board of these vessels exceed these 500 ml. The standard is referred to by suppliers, customers, buyers of bunker fuels and port authorities.

Problem

4. Although the mentioned requirement of taking representative fuel oil samples following standard ISO 13739:2020 (second edition, 2020-02, to be followed as from April 2022), describe that representative samples of fuels/bunkers have to be taken, no minimum content of sample is described anymore, in practise samples of 1 litre are being taken and given into retention on board of the vessels (as mentioned in 7.2.4.1.3 and 7.2.4.1.4 of ADN). In the case of quality issues, after the fuels/bunkers are transferred to a vessel, retained samples are used for scrutiny purposes and for proof the delivered marine fuel complies with legislation.

5. In 7.2.4.1.1 of ADN a maximum content per receptacle of 500 ml is given. According to 7.2.4.1.1 of ADN the number of cargo samples is limited to 30 receptacles.

6. In 7.2.4.1.4 of ADN, it is stipulated "On board supply vessels or other vessels delivering products for the operation of vessels, the number of cargo samples referred to in 7.2.4.1.1 may be increased from 30 to a maximum of 500."

Proposal

7. EBU/ESO propose to amend 7.2.4.1.4 of ADN to read as follows:

"7.2.4.1.4. On board supply vessels or other vessels delivering products for the operation of vessels, the number of cargo samples referred to in 7.2.4.1.1 may be increased from 30 to a maximum of 500 with a maximum content of 1 litre per receptacle."

Remark

8. With this amendment, the ADN requirement is aligned with industry practice and requirements of port authorities.

9. 7.2.4.1.1 second indent still remains the same, meaning: "receptacles shall meet the packing requirements referred to in Part 4 of ADR and shall be placed on board, at a specific point in the cargo area, such that under normal conditions of carriage they cannot break or be punctured and their contents cannot spill in the hold space. Fragile receptacles shall be suitable padded."

10. MARPOL Annex VI, Chapter 3, regulations 14 and 18, in conjunction with standard ISO 13739:2020 require a retention period of one year of these delivered representative marine fuel samples. According to representatives of the bunkering industry, the total number of samples retained on board most likely will not exceed the amount of 500 samples per year.

11. The increase of the total content of samples from 250 litres to 500 litres per (inland tanker) vessel will not negatively affect the stability of these vessels in a way these vessels will not meet the minimum requirements for stability.
