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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)****Forty-third session**

Geneva, 22-26 January 2024

Item 5 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
other proposals****Maximum content per receptacle 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)* *****Summary*

Related documents: Document ECE/TRANS/WP.15/AC.2/2023/40 of the forty-second session
ECE/TRANS/WP.15/AC.2/86; para. 53 (Report of the forty-second session)

Introduction

1. In seaports, many type 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 MARPOL Annex VI, Chapter 3, Regulation 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

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** A/78/6 (Sect. 20), table 20.5



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 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 these procedures are being followed and use the International Maritime Organisation (IMO) Port State Control (PSC) system to fulfil this need.

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 ISO 13739:2020 - Procedures for the transfer of bunkers to vessels, for supply vessels of fuels (bunker vessels). In practise, 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.

I. Problem

4. Although the mentioned requirement of taking representative fuel oil samples following ISO 13739:2020 (2nd 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 (l) 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, retain 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, "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."

II. Proposal

7. EBU/ESO proposes to amend 7.2.4.1.4 of ADN as follows (amendments are indicated in bold, italic and underlined):

"7.2.4.1.4. On board supply vessels or other vessels delivering products for the operation of vessels, ***the maximum content per receptacle of cargo samples referred to in 7.2.4.1.1 may be increased to a maximum of 1 litre per receptacle. The total quantity of cargo samples in litres must not exceed 250 litres on board of the vessel.***"

III. Remark

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

9. 7.2.4.1.1 second hyphen 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 ISO 13739:2020 require a retention period of one year of these representative delivered

marine fuel samples. According to representatives of the bunkering industry, the total quantity of cargo samples in litres will not exceed the amount of 250 litres per year.

11. Increase of the quantity per receptable up to a maximum of 250 litres quantity will not adversely affect safety compared to current regulations and will not negatively affect the stability of these vessels in a way that they do not meet the minimum requirements for stability compared to current regulations.
