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 4 (b) of the provisional agenda
Implementation of the European Agreement concerning the
International Carriage of
Dangerous Goods by Inland Waterways (ADN):
Special authorizations, derogations and equivalents

Request for a recommendation on the use of hydrogen fuel cells for the propulsion of the vessel “FPS Waal”

Transmitted by the Government of the Netherlands*,**

Summary

Related documents: ECE/TRANS/WP.15/AC.2/2023/3
Informal document INF.4 of the forty-second session
Informal document INF.24 of the forty-second session
Informal document INF.30 of the forty-second session
ECE/TRANS/WP.15/AC.2/86 (Paragraph 14)

Introduction

1. In light of the energy transition towards cleaner fuels, several vessels are now being built that use alternative fuels for their propulsion. One of these vessels is the FPS Waal, which will be retrofitted with a hydrogen fuel system as part of a zero-emission technology.

* Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/AC.2/2024/2
** A/78/6 (Sect. 20), table 20.5
supported by additional battery installations. The hydrogen will be stored in swappable 40ft containers.

2. The FPS Waal is a motor vessel, carrying containers. It will be part of a container convoy.

3. The FPS Waal has received a derogation from the CCNR. This derogation was communicated to the ADN Safety Committee in informal document INF.24 of the forty-second session. Furthermore, the CCNR is working to expand Chapter 30 and Annex 8, with regulations on hydrogen fuel systems to allow for these kind of propulsion systems on a permanent basis.

4. As the use of hydrogen as a fuel is currently not allowed according to 7.1.3.31, 9.1.0.31.1 of ADN, the Netherlands would like to request for a recommendation from the ADN Administrative Committee to issue a derogation for this vessel.

5. The following (updated) documents are provided to support the request for the derogation, the derogation will also refer to these documents:
   - Project description and HAZID report of the Retrofit of FPS Waal with H2 fuel cell power generation system, which includes:
     - a description of the project (page 8),
     - a HAZID report by Lloyds Register (Attachment 10) and
     - general arrangement drawings (Attachments 1 and 2);
   - Bunkering procedure;
   - Crew training.

**Questions received**

6. During the forty-second session of the ADN Safety Committee the hydrogen system for the FPS Waal was presented. Based on the presentation and the documentation provided additional questions were received by the Dutch delegation. Based on the questions the request for the recommendation has been updated to reflect a reporting requirement to the ADN Safety Committee on the project. As well as a reference to the updated documentation included in informal document INF.6.

7. One of the concerns raised were the stowing provisions of 7.1.4.4.4. These stowing provisions are complied with because the MEGCs containing the hydrogen fuel will be stowed in a separate cargo hold. Nevertheless, it was decided to include an extra stowing provision in the recommendation for containers containing ADN goods and reefer containers. This stowing provision will ensure that these containers will not be stowed in the rows adjacent to the MEGCs containing the hydrogen fuel.

8. Another concern raised were whether all operational provisions in part 7 were checked, and whether additional deviations were necessary. Part 7 was extensively checked and no further deviations from part 7 were deemed necessary.

9. With regard to the battery system envisioned in for the FPS Waal questions were raised on the impact of fires within this battery system on the cargo. The safety of the battery system was also a part of the approval process for the CCNR recommendation. The battery space is in full compliance with ES-TRIN regulation. An example of the additional safety features for the battery space is that the walls of the battery space are shielded with a water sprinkler system to prevent a fire in the space to affect other areas. This approach works in the other direction as well i.e. to protect the battery space from external fire.

**Justification and sustainable development goals**

10. The use of alternative fuels for propulsion for inland navigation vessels is one of the steps to be taken in the general energy transition towards the use of sustainable energy. CCNR
is planning on expanding ES-TRIN Chapter 30 and Annex 8 to include hydrogen fuel systems. The ADN Safety Committee could decide to expand the current exception for the use of LNG, to the other systems that are going to be included in the ES-TRIN. This derogation could provide the Safety Committee with further information, which could help make that decision in the future.

11. The issuing of this recommendation is a step towards the regulation of these systems within ADN, as such this proposal could be linked to Sustainable Development Goals: 7; to increase substantially the share of renewable energy in the global energy mix, and 13; Climate action.

**Action to be taken**

12. The ADN Safety Committee is requested to consider the proposals and to advise the ADN Administrative Committee as it deems appropriate.
Annex

Decision of the ADN Administrative Committee relating to the use of hydrogen fuel system on the dry cargo vessel FPS Waal (ENI 02326484)

Derogation No. X/2024 of XX January 2024

1. Pursuant to paragraph 1.5.3.2 of the Regulations annexed to ADN, the above-mentioned vessel may deviate until 31 December 2028 from the requirements of paragraphs:
   • 7.1.3.31 fuel having a flashpoint below 55 degrees
   • 9.1.0.31.1 fuel having a flashpoint below 55 degrees

2. The Administrative Committee decides that the use of this hydrogen fuel system is sufficiently safe if the conditions set by the Central Commission for the Navigation of the Rhine (CCNR) are met at all times.

3. The following additional conditions shall also apply:
   • No containers carrying [dangerous goods authorized by the Regulations annexed to ADN ][ADN goods] nor reefer containers may be placed next to, and in the first row in front of the hydrogen installation

4. All information on the use of the fuel cell system needs to be collected by the ship owner and kept for at least five years. This info will be submitted to the competent authority upon request.

5. The ship owner will submit an evaluation report to the competent authority [and the UNECE secretariat for information of the Administrative Committee] at the following moments:
   • 6 months after the commissioning of the ship
   • 2.5 years after the issue of this recommendation
   • 5 years after the issue of this recommendation

6. These evaluation reports should at least contain the following information:
   • failure and damage of the fuel cell system
   • leakage
   • bunkering information
   • repairs and alterations of the fuel cell system
   • operational data
   • incidents