

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)

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Geneva, 22-26 January 2024

Item 5(b) of the provisional agenda

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

Proposal to add again the word "ANHYDROUS" to the Proper Shipping Name of ID No. 9000 AMMONIA, DEEPLY REFRIGARATED (first entry) in Table C.

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

Introduction

1. Ammonia is a gas which, in liquified conditions, deeply refrigerated, is safely being transported worldwide for decades.
2. Ammonia is being transported under "UN 1005, AMMONIA, ANHYDROUS" in multiple regulations worldwide.
3. The wording 'ANHYDROUS' refers to substance which is technically free of water.
4. In practise, the substance Ammonia that is being transported, deeply refrigerated, may not contain water.
5. With the introduction of ID numbers in the ADN(R) 2003 a special ID number was assigned to "Ammonia, anhydrous, deeply refrigerated" under ID No. 9000.
6. Ammonia, anhydrous, deeply refrigerated can be transported in type G.1.1-barges, under the additional conditions as mentioned in Table C.
7. With the introducing of ADN 2021 a second ID No. 9000 number has been developed to enable transport in membrane cargo tanks type G.2.4-barges.
8. The Proper Shipping Name of the first entry of ID No. 9000 has been used for the second entry of ID No. 9000.
9. Thus resulting into the following entry as from ADN 2021:

9000	AMMONIA, ANHYDROUS, DEEPLY REFRIGERATED	2	3TC		2.1+2.3+8+N1	G	2	4	1; 3		95		1	no	T1 ¹²⁾	II A	yes	PP, EP, EX, TOX, A	2	1; 2; 31
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10. Nevertheless, with the introduction of ADN 2021, at the first entry of ID No. 9000, the addition of the word 'ANHYDROUS' had been removed.
11. As far as we can determine now, this was decided deliberately, as apparently ammonia is always transported anhydrous, and therefore the addition was considered unnecessary.

Problem

12. With the introduction of ADN 2021 ID No. 9000 entries are present as shown below:

9000	AMMONIA, DEEPLY REFRIGERATED	2	3TC		2.1+2.3+8+N1	G	1	1	1; 3		95		1	no	T1 ¹²⁾	II A	yes	PP, EP, EX, TOX, A	2	1; 2; 31
9000	AMMONIA, ANHYDROUS, DEEPLY REFRIGERATED	2	3TC		2.1+2.3+8+N1	G	2	4	1; 3		95		1	no	T1 ¹²⁾	II A	yes	PP, EP, EX, TOX, A	2	1; 2; 31

13. Which might lead to the conclusion two different kind of ammonia can be transported. The first ammonia, deeply refrigerated, at ID No. 9000, apparently not anhydrous, must be transported in a type G.1.1-ship. The second ammonia, deeply refrigerated at ID No. 9000, apparently anhydrous, must be transported in a type G.2.4-ship.
14. Which might also lead to the conclusion that the transport of ammonia, deeply refrigerated, apparently may be anhydrous or not.
15. Worldwide, the shipping of ammonia is, to comply with the specifications of the substance, always anhydrous.
16. On top of this, 2.2.2.2.2 of ADN, fourth indent, also refers to the Proper Shipping Name AMMONIA ANHYDROUS, DEEPLY REFRIGERATED for ID No. 9000 , as being expected from transportation prohibitions when carried on board of suitable gas tank vessels.

Proposal

17. Again add the word 'ANHYDROUS' after the substance AMMONIA at the Proper Shipping Name at the first entry of ID number 9000, Table C, of Chapter 3.2.
18. Thus also comply with the common Proper Shipping Name under which this substance is transported worldwide.
19. Thus also comply with the wording of the Proper Shipping Name in 2.2.2.2.2 of ADN.