



Economic and Social Council

Distr.: General
30 May 2024

Original: English

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-fourth session

Geneva, 26-30 August 2024

Item 4 (b) of the provisional agenda

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

7.2.4.21 — Filling of cargo tanks

Transmitted by FuelsEurope* **

Introduction

1. ADN 7.2.4.21 describes the factors to be taken into consideration when determining the degree of filling. Both 7.2.4.21.1 and 7.2.4.21.3 refer to the degree of filling given in Column (11) of Table C of Chapter 3.2.
2. However, in the case of substances where the applicable requirements must be determined by applying 3.2.3.3, there is no value in Column (11), as Column (11) is one of the columns of which the value must be determined.
3. FuelsEurope believes that the determination of degree of filling for so-called star positions is not properly described in 7.2.4.21. Some textual adjustments to 7.2.4.21.1 and 7.2.4.21.3, without any changes to the formula, would be closing this gap.

I. Proposals for ADN

4. FuelsEurope therefore proposes the following amendments to 7.2.4.21.1 and 7.2.4.21.3, as follows (new text in **bold and underlined**; deleted text in ~~strike through~~):

7.2.4.21.1 The degree of filling given in column (11) of Table C of Chapter 3.2 or calculated in accordance with 7.2.4.21.3 for the individual cargo tank shall not be exceeded.

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



For the carriage of substances where the applicable value for column (11) of Table C of Chapter 3.2 must be determined by applying 3.2.3.3, this degree of filling shall not be exceeded.

7.2.4.21.3 For carriage of substances **where the applicable value for column (11) of Table C of Chapter 3.2 must be determined by applying 3.2.3.3, or substances** having a relative density higher than that stated in the certificate of approval, the maximum permissible degree of filling of the cargo tanks shall be calculated in accordance with the following formula:

Maximum permissible degree of filling (%) = $a * 100 / b$

a = relative density stated in the certificate of approval

b = relative density of the substance **as communicated by loading installation.**

The degree of filling given in Column (11) of Table C, Chapter 3.2 **or as determined by applying 3.2.3.3 in case there is no value in column (11) of Table C of Chapter 3.2,** shall, however, not be exceeded.

II. Justification

5. The proposals aim to close a gap in the determination of maximum permissible degree of filling for substances of which the applicable requirements must be determined by applying 3.2.3.3 which is currently not captured in 7.2.4.21.
6. This filling degree is very much dependant on the ship type as determined by 3.2.3.3 and so this aspect bears significant relevance to 7.2.4.21.

III. Interlinkage to Sustainable Development Goals

7. Our proposal links to policy coherence for sustainable development target 17.14 and therefor supports Sustainable Development Goal 17 — Partnership for the Goals.

IV. Action to be taken

8. FuelsEurope requests the ADN Safety Committee to consider the proposal and to act as it deems appropriate.
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