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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 3 (c) of the provisional agenda
Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): interpretation of the Regulations annexed to ADN

List of interpretations of the classification societies

Transmitted by the Informal Group of Recommended ADN Classification Societies*, **

Introduction

1. At its thirty-ninth session the ADN Safety Committee requested the Classification Societies to provide to the UNECE secretariat a list of interpretations which have been discussed in previous sessions to be published on the UNECE website. Before the forty-second session the Group of Recommended ADN Classification Societies submitted informal document INF.12. The following interpretations have been discussed by the classification societies during their regular meetings and are now proposed to be included in the ADN List of Interpretations. Some comments have been received in April from delegations and can also be discussed during the session. The ADN Safety Committee is asked to accept these interpretations and include them on the UNECE website.

I. Information

2. Informal document INF.4 of the nineteenth session, para. 6., https://unece.org/DAM/trans/doc/2011/dgwp15ac2/WP15-AC2-19-inf4e.pdf

3. Proposal for ADN List of Interpretations:

* Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2024/44.

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

9.3.2.11.1 (d) – maximum length of cargo tanks

The cargo tank length can be increased, if sufficient strength for the cargo tanks is proven by sloshing calculations.

4. Informal document INF.6 of the twentieth session, para. 6. (d)
https://unece.org/DAM/trans/doc/2012/dgwp15ac2/WP15-AC2-20-inf6e.pdf

"6.d) Transitional provisions

Article 9.3.3.8.1 in 1.6.7.3 table: Classification of vessels

Due to the fact that a not classed vessel cannot obtained the 'highest class', the vessels sailing, for the time being, using this transitional provision, will be not able to sail after 31/12/2044."

5. Proposal for ADN List of Interpretations:

1.6.7.2.2.2 and 1.6.7.3— Transitional provision for 9.3.3.8.1 — Continuation of class

A vessel which was not built under survey and according to the Rules of a recognised classification society cannot get the "highest class", it will be impossible for such a vessel to receive a new certificate of approval after 31 December 2044.

6. Informal document INF.3 of the twenty–first session, para. 6. (i)
https://unece.org/DAM/trans/doc/2012/dgwp15ac2/WP15-AC2-21-inf3e.pdf

"6.i) Pressure testing of cargo tanks after 11 years

Due to various possible procedures for cargo tanks testing, the particular case of vessels carrying heavy fuel for bunkering services can be performed in conformity with maintenance of class rules of each Recommended Classification Society."

7. Proposal for ADN List of Interpretations:

9.3.2.23.4 and 9.3.3.23.4 – maximum intervals for the periodic tests of cargo tanks

For vessels carrying heavy fuel the maximum intervals for the periodic tests of 11 years can be performed in conformity with maintenance of class rules of each Recommended Classification Society.

8. Informal document INF.9 of the twenty–second session, para. 6. a), g), l)

https://unece.org/DAM/trans/doc/2012/dgwp15ac2/WP15-AC2-22-inf9e.pdf

"6.a) Consequence of "Waldhof" modifications (products list, stability booklet, loading instrument), document (2.IG07), point 5 of agenda and document WP15/AC2/42 p.23, 24 + 9.3.x.0.1.b , 9.3.x.8.1 and 9.3.x.13.3

After discussion, Informal Group members conclude that a stability booklet could be issued for 3 or 4 different densities otherwise a loading instrument has to be installed on board."

9. Proposal for ADN List of Interpretations:

9.3.X.13.3– sufficient intact stability for all stages of loading and unloading

For vessels for which prove of sufficient stability for all stages of loading and unloading is requested a stability booklet can be accepted as sufficient if it is issued for not more than four different densities of the cargo. In all other cases a loading instrument must be installed on board.

"6.g) Firefighting installation: Position of non-return valve (9.3.X.40.1)

Informal Group members agree to precise that non-return valves:

a) cannot be installed in service space, accommodation or engine room

b) have to be installed outside the area to protect"

10. Proposal for ADN List of Interpretations:

9.3.x.40.1 – spring-loaded non-return valve

The spring-loaded non-return valve for the fire-extinguishing system must be installed outside service spaces, accommodations or engine rooms and outside the area which need to be protected.

"6.l) Transport of C product in Type G vessel (7.2.1.21.5) (4.IG03)

Members of the Informal Group consider that the mentioned article means that the characteristics of Type C vessels have not to be taken into consideration when a Type G vessel is used to transport a Type C product. A Type G vessel is, by construction, safer than a Type C vessel."

11. Proposal for ADN List of Interpretations:

7.2.1.21.5 – transport of a product for a Type C vessel in a Type G vessel

The design characteristics of Type C tank vessels do not need to be taken into account when using a Type G vessel for carriage of a Type C product. On the other hand, all conditions of carriage, including equipment, need to be observed.

12. Informal document INF.23 of the twenty–fourth session, 5f/40
https://unece.org/DAM/trans/doc/2014/dgwp15ac2/WP15-AC2-24-inf23e.pdf

"5f. Use of fire-fighting lines for ballasting

40. Mr. Jacobs asks if it will be acceptable to use an ATEX approved firefighting and ballast pump situated outside the cargo area when this pump is used for ballasting purposes inside the cargo area. All agree that this isn't acceptable as the ADN is quite clear on this. In the fire-fighting lines a non-return valve has to be fitted at the boundary of the cargo area."

13. Proposal for ADN List of Interpretations:

9.3.2.35.1 – Bilge and ballast pumps for spaces in the cargo area

It is not acceptable to use an ATEX approved firefighting and ballast pump situated outside the cargo area when this pump is used for ballasting purposes inside the cargo area.

"6. Any other business

48. Mr. Broere asks if the water spray system which is prescribed at the new LNG regulations can be the same system as the cooling system of the deck area.

49. After some discussion it is agreed that this can indeed be the same system."

14. Proposal for ADN List of Interpretations:

7.2.4.28, 9.3.1.28 – water spray system

The water spray system which is required for cooling installations can be the same system as the system for the cooling of the deck area.

15. Informal document INF.13 of the twenty-fifth session, para. 4. a), c)

https://unece.org/DAM/trans/doc/2014/dgwp15ac2/WP15-AC2-25-inf13e.pdf

"4a. Hull side reinforcements in case of single hull (9.3.1.11.2a)

In this article a face plate made of flat steel is required. Mr. Broere asks if a flanged plate will also be acceptable. All agree that this is acceptable as long as the buckling requirements are fulfilled. Additionally, the acceptance of openings in web frames are discussed. These should most likely be avoided, but if they are really necessary sufficient strength of the web should be calculated."

16. Proposal for ADN List of Interpretations:

9.3.x.11.2a: Instead of the face plate mentioned in this requirement also a flanged plate may be used providing the same buckling strength is available.

"4c. Distance of 80 cm in 9.3.2.11.8

Mr. Broere asks if additional reinforcements are required if the distance is already 80 cm. All agree that this is not necessary as in this article already independent tanks are mentioned."

17. Proposal for ADN List of Interpretations:

9.3.2.11.8: When the ship has independent cargo tanks and the distance between the side shell and the cargo tank is already 80 cm the additional reinforcements as mentioned in 9.3.2.11.7 are no longer necessary.

18. Informal document INF.4 of the thirty–fourth session, para. 4. c), d)

https://unece.org/DAM/trans/doc/2019/dgwp15ac2/WP15-AC2-34-inf4e.pdf

"4.c) Explosion Group (BV).

The document 16.IG.4c is discussed, but the conclusion in the document is agreed upon where flame arrestors in exhaust systems are not used on gas tankers and explosion protection in Table C for gases are inserted for sake of completeness.

4.d) Interpretations ADN 2019 (BV). The document 16.IG.4d is discussed.

On the second item it's agreed that for temperature class T3 the maximum temperature is 200 degrees."

19. Proposal for ADN List of Interpretations:

9.3.x.53.1: If the list of substances on the vessel according to 1.16.1.2.5 is going to include substances for which temperature class T3 is indicated in column (15) of Table C of Chapter 3.2, then the corresponding surface temperatures within the assigned zones shall not exceed 200 °C.

20. Informal document INF.9 of the thirty-sixth session, paras. 3.i), 4.c)

https://unece.org/DAM/trans/doc/2020/dgwp15ac2/WP.15-AC.2-36-inf9e.pdf

"3.i) Sources of energy and electrical installations of pumps – point 49

The group discussed this item and is the opinion that the pump and the engine can be arranged in the same room but the second pump with their engine have to be arranged in another room. Actual no further action necessary."

21. Proposal for ADN List of Interpretations:

7.2.2.19.3: The exemptions mentioned in 7.2.2.19 of ADN are meant for the push boat.

"… vessels used for propulsion shall meet the requirements of the following paragraph: ... 9.3.3.40.1, (however, one single fire or ballast pump shall be sufficient), …"

The tank barge needs to fully comply with Part 9, taken transitional provisions into account.

As indicated in 9.3.3.40.1:

"a fire-extinguishing system shall be installed on the vessel. This system shall comply with the following requirements:

– It shall be supplied by two independent fire or ballast pumps, one of which shall be ready for use at any time. These pumps and their means of propulsion and electrical equipment shall not be installed in the same space;…"

The pump and the engine can be arranged in the same room but the second pump with their engine have to be arranged in another room. Actual no further action necessary.

22. 4.c) ADN 2019 interpretations and questions (LR) – *doc* 18 IG 04c

Document was discussed and the following was agreed as common point of view:

to 1. Question already solved with paragraph 27 of report of thirty-fifth session of the ADN Safety Committee

23. Proposal for ADN List of Interpretations:

1.2.1 (Classification of zones):

Bolted blind flange openings should be considered as openings in the framework of explosion protection, unless otherwise specified in the definition of Zone 1.

to 2. Arrangement of pumps not considered as an opening.

24. Proposal for ADN List of Interpretations:

1.2.1 (Classification of zones)

9.3.x.22 (Cargo tank openings)

Blind flanges at the end of cargo lines or vapour lines are considered as openings and need to be at the prescribed distances from openings in accommodation, wheelhouse, or engine rooms. In case the bolts have been properly secured by welding or other means they are not to be considered as an opening anymore. The securing can be done after the pressure testing.

to 3. Agreed

25. Proposal for ADN List of Interpretations:

1.2.1 (Classification of zones)

Openings of tanks such as tank hatches and butterwash hatches need to be at least 3.5 m from the forward bulkhead of the aft cofferdam and aft bulkhead of the forward cofferdam. With a minimum cofferdam width of 0.6 m the total distance to the end of the cargo area is minimum 4.1 m.

to 5. Agreed

26. Proposal for ADN List of Interpretations:

1.2.1 Definitions (Classification of explosion hazardous areas)

The vertical boundaries of the cargo zone are as shown in the drawings in 1.2.1. So, a virtual vertical line at the aft bulkhead of the aft cofferdam, and the forward bulkhead of the forward cofferdam.

to 6. Agreed

27. Proposal for ADN List of Interpretations:

1.2.1 Definitions (Classification of explosion hazardous areas)

Equipment on foreship (anchor winches) need to be EX protected. When the electro engine of the winch is placed 500 mm above the deck only IP55 is sufficient.

to 7. Agreed, anchor equipment will not be used during loading and unloading and therefore regulated with ADN 9.3.X.10.3

28. Proposal for ADN List of Interpretations:

1.2.1 Definitions (Classification of explosion hazardous areas)

Anchor chains and hawse pipes do not need to be 500 mm above deck, as it’s considered that the anchors will not be used during loading or unloading.

to 8. Agreed

29. Proposal for ADN List of Interpretations:

1.2.1 Definitions (Service space)

A space where a thermal oil heater is installed is also to be considered as a service space.

30. Document ECE/TRANS/WP.15/AC.2/2022/29

https://unece.org/sites/default/files/2022-06/ECE_TRANS_WP.15_AC.2_2022_29E.pdf

Section I, para. 5. Interpretation 9.3.4.1.1

31. Proposal for ADN List of Interpretations:

9.3.4.1.1

In 9.3.4.1.1 it's mentioned that the maximum allowable tank capacity may exceed the values as given in 9.3.x.11.1, and the minimum distances given in 9.3.1.11.2 (a) and 9.3.2.11.7 may be deviated from provided the requirements of 9.3.4 are being complied with.

The calculations as mentioned in 9.3.4.1.1 may be used for all ship sizes.

32. Proposal for ADN List of Interpretations:

1.2.1 Service space

According to the definition in 1.2.1, a *service space* means a space which is accessible during the operation of the vessel and which is neither part of the accommodation nor of the cargo tanks, with the exception of the forepeak and after peak, provided no machinery has been installed in these latter spaces.

Considering this definition of a *service space*, an *engine room* can be considered as a *service space*.