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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 4 (b) of the provisional agenda

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

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

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

Summary

Related documents: Informal document INF.15 of the forty-third session
ECE/TRANS/WP.15/AC.2/88 (Paragraph 64)

Introduction

1. Ammonia is a gas that has been safely transported around the world for decades, in liquified, deeply refrigerated conditions.
2. Ammonia is being transported under "UN No. 1005, AMMONIA, ANHYDROUS" in multiple regulations worldwide.
3. The word "ANHYDROUS" refers to a substance which is technically free of water.

* Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2024/51.

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

4. In practice, the substance Ammonia that is being transported, deeply refrigerated, may not contain water.
5. With the introduction of ID numbers in the ADN(R) in 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 mentioned in Table C.
7. With the introduction in ADN 2021 of a second entry for ID No. 9000, transport in membrane cargo tanks type G.2.4-barges is now possible.
8. The Proper Shipping Name of the first entry of ID No. 9000 has been also used for the new second entry.
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 in ADN 2021 of the second entry for ID No. 9000, the word "ANHYDROUS" had been removed from the Proper Shipping Name of the first entry.
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 in ADN 2021 of the second entry of ID No. 9000, both ID No. 9000 entries are presented 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. This might lead to the conclusion that two different kinds 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-vessel. The second ammonia, deeply refrigerated at ID No. 9000, apparently anhydrous, must be transported in a type G.2.4-vessel.
14. It might also lead to the conclusion that the transport of ammonia, deeply refrigerated, could be done whether anhydrous or not.
15. Worldwide, the shipping of ammonia is always anhydrous, to comply with the specifications of the substance in the different regulations.
16. In addition, the fourth indent of 2.2.2.2.2 of ADN, also refers to the Proper Shipping Name AMMONIA ANHYDROUS, DEEPLY REFRIGERATED for identification number 9000, as being exempted from transportation prohibitions when carried on board suitable gas tank vessels.

Proposal

17. Adding again the word "ANHYDROUS" after "AMMONIA" in the Proper Shipping Name of the first entry of ID number 9000, in Table C of Chapter 3.2.
18. Thus it is complying with the common Proper Shipping Name under which this substance is transported worldwide and also with the wording of the Proper Shipping Name in 2.2.2.2.2 of ADN.