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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 (b) of the provisional agenda

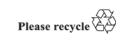
Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): special authorizations, derogations and equivalents

Alternative fuel systems — A framework for considering requests for derogations

Transmitted by the Government of the Netherlands*, **

Introduction

- 1. As part of a broader energy transition towards cleaner renewable methods of energy consumption, the transport sector is developing alternative fuel systems that make use of new fuels. The use of cleaner alternative fuels will be an important step towards the UNECE Sustainable Development Goals (SDGs) and towards the goal of largely eliminating greenhouse gases and other pollutants by 2050, as stated in the Mannheim declaration of the Central Commission for the Navigation of the Rhine (CCNR).
- 2. The first alternative fuel that was developed for use as a fuel on inland navigation vessels was liquefied natural gas (LNG). Recently alternative fuel systems making use of liquid or gaseous hydrogen, methanol and compressed natural gas (CNG) are being developed.
- 3. Requirements for these alternative fuels are first developed for the general inland navigation by a working group from European Committee CESNI (CESNI/PT/FC) in the European Standard laying down Technical Requirements for Inland Navigation vessels (ESTRIN). Afterwards the ADN Safety Committee could examine whether an alternative fuel is also suitable as a fuel for the transport of dangerous goods.





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

- 4. Pilot projects of vessels making use of alternative fuels are generally being launched before the legislative process is finished. Such pilot projects require derogations, requesting the Committee to consider alternative fuels before the technical requirements are fully developed for ES-TRIN. However, the Committee only considers requests for derogations for projects that have been granted derogations by the CCNR, making sure that also for derogations the general safety of the projects is already considered before a request is presented for the ADN Safety Committee.
- 5. Currently multiple requests for derogations are being considered by this Committee. And it is not unthinkable that, while requirements for alternative fuels are still in development, more requests for derogations can be expected to follow.
- 6. Requests for derogations require the ADN Safety Committee to evaluate whether alternative fuels are also suitable for vessels carrying dangerous goods. However, based on which considerations this evaluation has to be done has not been determined; and discussion on what should be considered, and what should not be considered, have delayed the current requests for derogations.
- 7. Agreement on the safety requirements to be considered by the ADN Safety Committee for a derogation, could facilitate the process of the requests for a derogation. A clear set of criteria will not only facilitate the discussions in the ADN Safety Committee, it will also bring more clarity for ship owners which information should accompany such a request.
- 8. Seeing that more requests for derogations can be expected in the future, and that a clear description of the considerations could facilitate the ADN Safety Committee to better evaluate a request, the Dutch delegation would like to volunteer to investigate and summarize which considerations are necessary to evaluate a request for a derogation. We propose to present a formal document for the next session of the ADN Safety Committee, outlining which safety requirements are already considered before a derogation from the CCNR is granted, and consequentially which safety requirements have to be considered by the ADN Safety Committee.
- 9. We kindly invite all other interested delegations to send us their input on which safety requirements have to be considered for a request for a derogation for the use of an alternative fuel by the end of September 2024, so that we can present a comprehensive proposal.

Justification and sustainable development goals

10. As part of the process of enabling the inland navigation industry to reach for cleaner fuels, this proposal contributes towards the UNECE Sustainable Development Goal 7; to increase substantially the share of renewable energy in the global energy mix, and 13; Climate action.

Action to be taken

11. The ADN Safety Committee is requested to consider the proposals and to take action as it deems appropriate.

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