
Economic Commission for Europe

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)**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

**Comments on document ECE/TRANS/WP.15/AC.2/2024/44,
List of interpretations of the classification societies,
transmitted by the Informal Group of Recommended ADN
Classification Societies****Transmitted by the Government of Germany****Para. 1**

1. In our view pending misunderstanding of the allocation of tasks:

ECE/TRANS/WP.15/AC.2/52:

“17. The Safety Committee reiterated its request that recommended ADN classification societies should maintain a list of any interpretations of ADN which they had agreed on (see ECE/TRANS/WP.15/AC.2/40, para. 49) which should be published on the UNECE website.”

2. This is understood in such a way, that group of Classification Societies maintains a clean list of their Interpretations in a format that can be added easily by Secretariat at a proper place.

Headline II

3. In our view, some of the following points should be subject to amendments to the ADN. See below comment to para 2.

Para. 2

4. Shall this provision be valid for both existing requirements, sentence one and sentence two?

5. In our view this is a case for adding a new sentence to the article of ADN as suggested by (part of) the ADN Safety Committee.

ECE/TRANS/WP.15/AC.2/86, 21.:

“ ... A number of delegates preferred to transform some of the interpretations into amendments aimed at clarifying the text of the Regulations annexed to the ADN in the different official languages. The representative of the Recommended ADN Classification Societies invited all delegates to send him their written comments. He volunteered to prepare

for the next session in January 2024, an official document with draft amendments taking into account the comments received.”

Para. 4

6. This interpretation was not confirmed by ADN Safety Committee.

ECE/TRANS/WP.15/AC.2/42 para. 54.:

“the Safety Committee indicated that even if the vessel has not been constructed under the supervision of a classification society, it could be considered that it met the construction requirements for classification in the highest class if it could be proved that the technical requirements of the Regulations annexed to ADN had been satisfied. This question could be dealt with in greater depth provided that the problem was spelled out in more detail.”.

Para. 5

7. Because this goes far beyond the wording of the article, it should be included in the regulation.

Para. 6, first proposal

8. Different statement above from the report of the group and as given by the ADN Safety Committee: ECE/TRANS/WP.15/AC.2/46, para. 72:

“The Safety Committee confirmed the interpretations proposed in paragraphs 6 (a) and (g), namely that a stability booklet can be issued for 3 or 4 different densities, otherwise a loading instrument has to be installed on board”

“Not more than” could be understood as 1 or 2 as well.

Para. 6, second proposal

9. Different wording to what ADN Safety Committee confirmed:

“and that regarding firefighting installations, non-return valves cannot be installed in service spaces, accommodation or engine rooms and shall be installed outside the protected area (9.3.X.40.1).”

“Protected area” (see 1.2.1?) vs. “area which need to be protected.”

Para. 8, first proposal

10. Current 9.3.x.11.2 (a) does not mention a “face plate”:

“In the cargo area (except cofferdams) the vessel shall be designed as a flush-deck double-hull vessel, with double-hull spaces and double bottoms, but without a trunk;

Cargo tanks independent of the vessel’s hull and refrigerated cargo tanks may only be installed in a hold space which is bounded by double-hull spaces and double bottoms in accordance with 9.3.2.11.8 below. The cargo tanks shall not extend beyond the deck;”.

Para. 11

11. In our understanding, this does not cover in total what was said by ADN Safety Committee, ECE/TRANS/WP.15/AC.2/82, para. 16:

“9.3.4.1.1

In 9.3.4.1.1 it is 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.”

After para. 12

12. Any consideration on the pending task in ECE/TRANS/WP.15/AC.2/82, para. 17 is missing.

“17. ... A proposal to add references to the interpretations in the relevant parts of the ADN or to add interpretations as footnotes would also be discussed.”
