Degassing of cargo tanks during sailing (under closed conditions)

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

Summary

Executive summary: This document requests the Safety Committee to consider adjustment(s) of the ADN in order to allow degassing of cargo tanks during sailing (under closed conditions)

Action to be taken: Take actions as the Safety Committee deems appropriate

Related documents:
- ECE/TRANS/WP.15/AC.2/2015/29
- Informal document INF.18 of the twenty-fifth session
- Informal document INF.19 of the twenty-sixth session
- ECE/TRANS/WP.15/AC.2/56, paras. 70-74
- ECE/TRANS/WP.15/AC.2/2016/25
- ECE/TRANS/WP.15/AC.2/2016/49
- ECE/TRANS/WP.15/AC.2/58, paras.73-74
- ECE/TRANS/WP.15/AC.2/2017/47
- ECE/TRANS/WP.15/AC.2/60, paras 53-61
- ECE/TRANS/WP.15/AC.2/64, para 70
- ECE/TRANS/WP.15/AC.2/64/Add.1
- ECE/TRANS/WP.15/AC.2/2018/13

Introduction

1. The degassing of barges and the CDNI-ventilation ban developments are a current topic for the industry.

2. The informal working group on degassing was active in 2017/2018 to revise the provisions of degassing, which have been implemented in the ADN 2019. The purpose of the Informal working group was to set provisions to enhance the possibility for safe degassing
towards the open air (as long as not forbidden by other legislation) and towards an onshore reception facility.

3. These provisions have come into force in 2019, and reception facilities have since implemented.

4. With the enactment of the renewed CDNI treaty, the reduction of venting cargo vapors into the open atmosphere has been accelerated. The inland tank shipping industry is eager to cooperate with this effort and happy with the ventilation ban, for good sake of the crew, people living in the surroundings of the waterways and the environment.

5. If cargo tanks still need to be degassed, this can be done at so-called degassing installations. These degassing installations are located at onshore facilities, as stipulated in the ADN.

6. From the reports of the "Informal Working Group on Degassing of Cargo Tanks," it can be inferred that the phrase "to on board mobile reception" was added to prevent venting to a mobile installation while underway, such as bringing along another ship or vessel equipped with a mobile degassing system. At that time, it was investigated and determined that treating cargo vapours on board the vessel itself was not a feasible option.

7. At that time, the last sentence was added to the new paragraph 7.2.3.7.2.1: "Degassing to on board mobile reception facility is prohibited."

I. New developments

8. Meanwhile, as part of the solution of the degassing issue in combination with the lack of sufficient onshore reception facilities, new techniques are brought to the attention of barge owners, harbour authorities and Ministries. There are new, proven technologies, mobile or stationary reception facilities, that could be installed on board of a vessel. This means degassing in a closed way (without emitting dangerous gases/vapours) is feasible.

9. These techniques have been proved ashore and foreseen of extensive risk analyses, HAZID-studies and ATEX-approvals.

10. EBU/ESO would support any inventions of new techniques to cope with the challenge of the ventilation ban. This would bring flexibility and avoid unnecessary extra sailing to the location of the reception facility, which "facilitates the transport". This is one of the pillars of the ADN-Treaty.

II. Request

11. EBU/ESO would like to ask the ADN Safety Committee whether it might be an idea to request the members of the informal working group on degassing of cargo tanks to come back together and have a new assessment on the current provisions, being seen in the light of investigation and research of possible new techniques of today.

12. In case the ADN Safety Committee supports this proposal, the informal working group could consider:

   (a) What new techniques are available? Presentations/demonstrations by entrepreneurs could be provided to this Informal working group;

   (b) Consideration of the safety level of these new techniques, especially being considered form the perspective of explosion safety and workers safety;

   (c) Consideration whether these techniques could be applied on board of tank vessels;

   (d) Consideration of which ADN-provisions would have to be amended to allow an on board reception facility.
III. Justification

13. Due to the urgent and compelling nature of the issues around degassing while sailing, in combination with the lack of onshore reception facilities and the need of the industry to be as flexible as possible in the transport of dangerous goods, EBU/ESO believes that a solution for safe closed degassing while sailing should be explored.

IV. Action to be taken

14. The Safety Committee is invited to consider the request under II to take action as it deems appropriate.

V. Sustainable Development Goals

15. Our proposal links to policy coherence for sustainable development target 3.9, 12.5 and 17.14 and therefore supports Sustainable Development Goal’s 3.9 (Ensure healthy lives and promote well-being for all at all ages), 12.5 (Ensure sustainable consumption and production patterns), 17.14 (Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development).