

Economic Commission for Europe**Inland Transport Committee**

23 August 2024

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 8 of the provisional agenda

Any other business

Discussion paper on loading arms/hoses that are not (fully/efficiently) emptied and/or not fully released from pressure before and/or after loading/discharging, which can lead to a loss of containment which can lead to environmental spills and/or exposure to crewmembers on board of barges

Transmitted by the Federation of European Tank Storage Associations (FETSA)

*Summary***Executive summary:**

In The Netherlands discussions are taking place between the different sector organizations of inland shipping and shoreside installations regarding the best ways to prevent not fully or not efficiently emptied loading arms and hoses and how to fully release them from pressure before handing the arm or hose to the inland tanker. The issue was identified after reported incidents (source: Dutch Platform Zero Incidents (PZI)) with the unintended release of product and/or pressure and crewmembers involved. Dutch discussions on best techniques and procedures are ongoing, a working group of experts, both shore installations and shipping industry, is working on a best practice.

European Barge Union/European Skippers' Organisation (EBU/ESO) with document ECE/TRANS/WP.15/AC.2/2024/59 proposes to solve the issue within the ADN and would like to propose to amend 1.4.3.3 and 1.4.3.7.1 of the ADN - Safety obligations of the main participants together with a 2nd proposal to amend the ADN Safety checklist 8.6.3 with a new extra sub-question under part 6. FETSA acknowledges the challenges and feels the importance to solve the identified issues on loading arms and hoses. FETSA also is not objecting to amend the related articles but would propose, since this is a rather complex issue, to discuss the problem, root cause, organisational and technical solutions first, to prevent "unclear texts and definitions". Besides that, it is crucial to ensure that a realistic timeframe for implementation will be taken into account.

Actions to be taken:

Invite the Safety Committee to establish an informal working group of experts to discuss the issue, to come up with different

technical and or organizational solutions and to discuss realistic transitional periods. The working group should come up with a good and clear proposal to change the text in ADN as well.

Introduction

1. FETSA, as representative of European tank terminals, fillers and unloaders regarding the ADN, and as representative of part of the shoreside industry, acknowledges that crewmembers are sometimes confronted with loading arms/hoses that are not (fully/efficiently) emptied and/or have not been released from pressure before and/or after loading/discharging.
2. Loading arms/hoses that are not fully/efficiently emptied or loading arms/hoses which have not been fully released from pressure before handing over to the crew of the barge, may lead to, and have led to, incidents with the result of spills and exposure of dangerous goods to crewmembers.
3. FETSA acknowledges that this is a highly unwanted situation and is, just as EBU/ESO, in favour of extra attention and actions to prevent uncontrolled release of product and/or pressure.
4. Although some participants may be of the opinion that this topic should not be included in ADN, FETSA does not object to amendments in ADN which will help to clarify this topic.
5. This for the importance to shipping- and shoreside installations and their personnel in order to prevent spills and incidents involving dangerous goods and in order to protect the environment. FETSA emphasizes also the importance for amendments to the ADN on this topic as this will ensure a level playing field within Europe.
6. At the same time, and due to the complexity of the issue, due to for example the huge amount of shoreside technical differences thus possible different technical and organizational solutions, the amendments should be very clear and not open for discussion or (local)interpretations.
7. The current proposal of EBU/ESO with document ECE/TRANS/WP.15/AC.2/2024/59, although the background is fully understandable, FETSA thinks is not clear enough and wording as “adequately” may cause uncertainty and leave too many room for (local) discussions, questions and interpretations, certainly keeping the complexity of the issue in mind.
8. FETSA would, regarding the importance but also the complexity of the issue, be in favour of the installation of an informal working group of experts to thoroughly look at the issues and come up with a decent set of technical and organizational solutions on the basis of the different types of technical shoreside installations and from there on with a clear set of amendments to the ADN fitting these different solutions.
9. It is a fact that proposed solutions may implicate (significant) investments as a result of the need to adapt or replace current installations. Also should be taken into account the need for changes in the shoreside environmental permits et cetera. FETSA therefore also proposes that on the basis of the solutions proposed by a possible established informal working group of experts, a fitting transitional period or transitional periods for the possible adjusting or replacing of environmental permits and shore installations infrastructure is being decided on.
10. Information that has already been gathered within a working group on this subject in the Netherlands, could of course be used as input.

Proposal

11. FETSA invites the Safety Committee to consider the establishment of an informal working group of experts. This informal working group of experts could discuss the justifications under paragraphs 1 to 8 and can advise the Safety Committee on a best practice, possible amendments to the ADN and a fitting transitional period(s).

12. Based on the work and results of an informal working group of experts FETSA invites the Safety Committee to act as it deems appropriate.
