

**Economic and Social Council**

Distr.: General  
1 November 2013  
English  
Original: French

**Economic Commission for Europe****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)**

**Twenty-fourth session**

Geneva, 27–31 January 2014

Item 5 (b) of the provisional agenda

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

**Common vapour pipes on tank vessels – Fire-fighting installation at the flame arrester, ADN 9.3.2.22.5**

**Transmitted by the Government of Germany<sup>1,2</sup>**

*Summary*

<b>Executive summary:</b>	Until now, it has been possible not to require flame arresters in certain conditions; this possibility raises issues from the point of view of technical safety and should not be maintained.
<b>Action to be taken:</b>	Deletion of indent (v) from 9.3.2.22.5 (a).
<b>Related documents:</b>	None.

<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94 and ECE/TRANS/2012/12, programme of activity 02.7, (A1b)).

<sup>2</sup> Distributed in German by the Central Commission for the Navigation of the Rhine in document CCNR-ZKR/ADN/WP.15/AC.2/2014/17.



## Introduction

1. The following paragraph appears under indent (v) of 9.3.2.22.5 (a):  
“When a fire-fighting installation is permanently mounted on deck in the cargo area and can be brought into service from the deck and from the wheelhouse, flame arresters need not be required for individual cargo tanks.”
2. Under 9.3.2.40.1, it is specified that each tank vessel of type C must be fitted with a fire-extinguishing system.
3. As a result, no type C tank vessel would need to have its vapour pipe fitted with a flame arrester at the connection to each cargo tank.

## Proposal

4. Amend indent (v) of paragraph 9.3.2.22.5 (a) as follows:

Replace the text with: “*Deleted*”

## Justification

5. According to information from the German delegation, the possibility of accepting a fixed fire extinguishing system instead of flame arresters was introduced into the former ADN of CCNR as part of a revision of the requirements for flame arresters; it was subsequently taken up in the same format in ADN.
6. The reasoning might have been that an appropriate fire extinguishing installation on the deck would prevent a flame’s passage with the same degree of safety as the use of flame arresters.
7. With the introduction of this requirement, a specification of the requirements for fire extinguishing equipment was supposed to be issued by the CCNR bodies, but this was never done. The ADN Safety Committee has still not dealt with this question.
8. It cannot be assumed that a fire extinguishing system whose design and operation are not specified in detail can prevent a flame’s passage with the same degree of safety as a flame arrester. The German delegation is unaware of any initiatives aimed at stipulating more detailed requirements for the fire extinguishing systems.

## Safety

9. The German delegation is of the opinion that an unspecified, general use fire extinguishing system does not offer the same degree of safety as flame arresters meeting technical specifications and placed to ensure effectiveness. The latter have proven their worth.

## Feasibility

10. In principle the proposed regulation is feasible from the technical point of view.