Economic Commission for Europe

Inland Transport Committee

22 November 2012

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-second session

Geneva, 22-25 January 2013

Items 4 (c) and 5 (b) 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;

and

Proposals for amendments to the Regulations annexed to ADN:

Other proposals

Proposals transmitted by the Recommended ADN Classification Societies

I. Problem of interpretation

- 1. Concerning the three following sentences:
 - 3.2.3.1 Explanations concerning Table C, column (13): "3. Open sampling device";
 - 8.6.1.3 Model certificate, item 8, first bullet under "Sampling device", it is mentioned: "sampling opening"
 - 9.3.x.21.1 (g) "A connection for a sampling device, closed or partially closed, and/or at least one sampling opening as required in column (13) of Table C of chapter 3.2".
- 2. The question is whether "sampling opening" and "open sampling device" is the same equipment? If yes, it would be better to use only one wording for these two expressions.
- 3. It is noted that "sampling opening" is defined in 1.2.1 but neither "sampling device" nor "open sampling device" are defined.
- 4. The Recommended ADN Classification Societies propose the use, by analogy with the other types of sampling device, of the expression: "open sampling device"

II. Problem of application of ADN

- 5. 9.3.x.21.1 (g) "A connection for a sampling device, closed or partially closed, and/or at least one sampling opening as required in column (13) of Table C of chapter 3.2."
- 6. If the expression "and/or" and in particular the word "or" seems valid for 9.3.3.21.1(g) in the case of type N open vessels, this expression is less appropriate in the case of type C vessels (9.3.2.21.1 (g)).

- 7. Using "or" only, would refer to a type C vessel which is able to transport only N open products. Even if this is possible, it is not good practice to build a type C vessel without a "connection for sample device".
- 8. The Recommended ADN Classification Societies propose the deletion of the word "or" in 9.3.2.21.1 (g).