

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-third session**

Geneva, 26-30 August 2013

Item 4 (b) of the provisional agenda

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

Access to cofferdam – 9.3.2.20.1, 9.3.3.20.1**Transmitted by the Recommended ADN Classification Societies****Reference**

ADN Safety Committee - January 2013 – document INF.9

ADN Safety Committee - January 2013 – document ECE/TRANS/WP.15/AC.2/46-Report

9.3.2.10.3 and 9.3.3.10.3

In the cargo area, and the sills of hatches and ventilation openings of premises located under the deck shall have a height of not less than 0.5 m above the deck. This requirement does not apply to access openings to double-hull and double bottom spaces.

9.3.2.20.1- Type C vessel

Cofferdams shall be accessible through an access hatch.

If, however, the cofferdam is connected to a double hull space, it is sufficient for it to be accessible from that space. In this case an arrangement shall be made for possible monitoring in order to ascertain from the deck whether the cofferdam is empty.

Comment

The possibility given by 9.3.2.10.3 to install flush deck openings to access double-hull spaces has had as a consequence the consideration that access to cofferdams from double-hull spaces could be flush deck openings even if the first paragraph of 9.3.2.20.1 requires an access hatch.

Outside the exception, vessels having access to cofferdams from double-hull spaces are equipped with flush deck openings.

It could also be considered that cofferdams could be accessible by a flush deck opening the position of which is not defined subject to monitoring of the level of liquid in the cofferdam.

9.3.3.20.1 - Type N vessel

Cofferdams shall be accessible through an access hatch.

If, however, the cofferdam is connected to a double hull space, it is sufficient for it to be accessible from that space. For openings giving access to double-hull spaces on deck the last sentence of 9.3.2.10.3 remains applicable. In this case an arrangement shall be made for possible monitoring in order to ascertain from the deck whether the cofferdam is empty.

Comment

The second sentence ('For openings giving accessremains applicable') giving explicitly the possibility to install a flush deck opening when access to a cofferdam is made from double-hull spaces does not exist in the German version.

Position of Recommended ADN Classification Societies

Regarding the French, English and Russian versions, the Recommended ADN Classification Societies consider that there is no reason to make a difference - *as concerns structural provisions* - between Type C and Type N vessels. The German version seems to be the correct one (see ADNR rules).

Recommended ADN Classification Societies consider that the need to have access to cofferdams from double-hull spaces is rare and does not require provisions.

Proposal

Delete the second paragraph of 9.3.2.20.1 and 9.3.3.20.1 *with appropriate transitional provisions*.
