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**Economic Commission for Europe****Inland Transport Committee**

24 January 2014

**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**

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**EUROPIA position on the EBU document  
ECE/TRANS/WP.15/AC.2/2014/24  
"ADN requirements related to substance"****Transmitted by EUROPIA****I. Introduction**

EUROPIA/CONCAWE members have evaluated the proposal transmitted by the European Barge Union (EBU) to the ADN Safety Committee related to a relaxation of the safety requirements depending on the classification of products transported throughout the service life of the barges (ECE/TRANS/WP.15/AC.2/2014/24). It concerns in particular relaxed safety requirements with respect to the presence of flame arrestors capable of withstanding steady burning and classes of electrical installations on board.

**II. Position**

The members of EUROPIA/CONCAWE cannot support the amendment proposed by the EBU that aims to reduce existing safeguard measures and overall level of safety. Such a relaxation would increase the risk to plants/terminals, jetties and/or harbors where barges load or offload as well as to the barge crew.

It is most likely that when the amendment is accepted, EUROPIA/CONCAWE members may not allow vessels without appropriate explosion protection measures at their jetties for safety reasons, as compliance with process safety (SEVESO) and Occupational Health and Safety Regulations (OSHA), as well as with the Safety Management Systems can no longer be warranted.

We remind the ADN safety committee to the ALSPRAY explosion at the Lingen installation (29.03.2011) related to a barge.

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### **III. Proposal**

Assuming that throughout a vessel lifespan they would be restricted to a small spectrum of products transported is unsound introducing unnecessary risks. Therefore EUROPIA/CONCAWE urges the ADN safety committee not to approve proposals which lead to a reduction of safety requirements currently in place for barges.

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