

ECONOMIC COMMISSION FOR EUROPE

13 August 2015

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-seventh session
Geneva, 24-28 August 2015

Agenda item 7

Any other business

Request for consultative status

Transmitted by the European Bulk Oil Traders' Association (EBOTA)

The secretariat has received from the European Bulk Oil Traders' Association (EBOTA) a request for participation in the work of the Safety Committee as an observer non-governmental organization.



The Secretariat
UN Economic Commission for Europe
Transport Division
Palais des Nations
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Your Ref:
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Date: 6 August 2015

Dear Sir

Administrative Committee of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN)

We write on behalf of the members of the ADN Working Group within the European Bulk Oil Traders' Association ("EBOTA").

EBOTA was established with the aim of engaging with legislators and regulators, on a national, European and international level, in relation to any matters affecting those involved in the European bulk oil trading sector.

There are fifteen Full Members of EBOTA:

BP	JP Morgan	Noble
Cargill	Litasco	Phillips 66
Chevron	Mercuria	TOTSA Total Oil Trading SA
Gunvor	Morgan Stanley	Trafigura
Hartree	Nidera	Vitol

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Associate Members include Electronic Shipping Solutions, Swiss Trading & Shipping Association, SGS, Intertek and Holman Fenwick Willan LLP, who also act as Secretariat.

EBOTA currently has Working Groups focusing on the European legislation REACH, RED and the ADN. Each Working Group is made up of members' representatives, who consider a range of regulatory issues affecting members, seeking practical solutions and guidance for members. The ADN Working Group is currently chaired by TOTSA Total Oil Trading SA, with members including BP, Cargill, Chevron, Litasco, Mercuria, Morgan Stanley, Noble, Phillips66, Trafigura and Vitol.

The EBOTA ADN group has two main objectives:

Firstly, to help barge charterers understand and respect their obligations under the ADN through training workshops delivered both in both London and Geneva, to improve understanding within EBOTA Member companies and to encourage the application of good practices to ensure charterers respect their obligations under the ADN.

Secondly, to look at the ADN and related legislation, focussing on proposed future changes and how they are likely to affect EBOTA Members. As a group, we are very concerned to understand fully the implications and implementation of new legislation and also, if possible, to be involved closely in discussions concerning any changes which may be made to future versions of the ADN.

As you will appreciate, our members are all long-established and well-respected participants in the European oil trading sector. Between them, they have a wealth of experience in the trading and carriage of a wide range of liquid bulk petroleum and petrochemical products by barge. EBOTA members are closely involved in ensuring the safety of tanker barging operations and some EBOTA members are founding members of the European Barge Inspection Scheme (EBIS). For the years 2013 and 2014, EBOTA ADN Working Group Members chartered a very significant tonnage between them for the carriage of bulk liquid oil which represents a substantial share of the total market.

We understand that you have on your committee a wide range of representatives with expertise in a number of relevant areas of the trade, including technical knowhow and terminal experience. However, we should be grateful if you could please consider whether there is any scope for EBOTA to take on a role, in our capacity as oil traders and barge charterers, in the discussions around the development of new ADN legislation. We believe that we have a useful contribution to make and that we can put forward an important viewpoint, which would complement the perspectives currently represented on the committee.

Yours faithfully



Judith Prior

for and on behalf of EBOTA

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