

Economic Commission for Europe**Inland Transport Committee**

August 19, 2019

English

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)****Thirty-fifth session**

Geneva, 26-30 August 2019

Item 4 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
other proposals****Request for discussion on entries in Table C where remark 44 is indicated****Transmitted by CEFIC and FuelsEurope***Summary*

Executive Summary:	Table C can be made simpler by eliminating double entries, where the only difference is the Explosion group in column (16) and the reference to remark 44 in Column (20).
Action to be taken:	Start a discussion within a working group.
Related documents:	ECE/TRANS/WP.15/AC.2/68 – report of the thirty-third session, Item VI, C, 74-77. ECE/TRANS/WP.15/AC.2/2018/44, Item F, 32-38, report of the tenth session of the informal working group on “Substances”.

I. Introduction

1. The introduction of remark 44 came after extensive discussion in the Safety Committee and the Informal Working Group on Substances and has now been implemented in ADN 2019. A proposal by the informal Working Group to modify the text of remark 44 effective 2021 was adopted by the Safety Committee during its thirty-third session.
2. For a number of entries in Table C of ADN column (20) reports remark 44. In fact all those entries are exact duplication of other entries, with only a difference that column (16) on the Explosion group, see example below.

UN No. or substance identification No.	Name and description	Class	Classification code	Packing group	Dangers	Type of tank vessel	Cargo tank design	Cargo tank type	Cargo tank equipment	Opening pressure of the pressure relief valve/high velocity vent valve, in kPa	Maximum degree of filling in %	Relative density at 20 °C	Type of sampling device	Pump room below deck permitted	Temperature class	Explosion group	Anti-explosion protection required	Equipment required	Number of cones/blue lights	Additional requirements/Remarks
(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
1268	PETROLEUM DISTILLATES, N.O.S. or PETROLEUM PRODUCTS, N.O.S. WITH MORE THAN 10% BENZENE	3	F1	II	3+CMR+F+ (N1, N2, N3)	C	*	*	*	*	*		*	yes	T4 ³⁾	II B ⁰⁾	yes	*	1	27 *see 3.2.3.3
1268	PETROLEUM DISTILLATES, N.O.S. or PETROLEUM PRODUCTS, N.O.S. WITH MORE THAN 10% BENZENE	3	F1	II	3+CMR+F+ (N1, N2, N3)	C	*	*	*	*	*		*	yes	T4 ³⁾	II B ⁰⁾ (II B3)	yes	*	1	27; 44 *see 3.2.3.3

3. CEFIC and FuelsEurope are of the opinion that the duplicate entries which have no remark 44 could be merged to one which has remark 44 if the text for remark 44 would be slightly modified and the same level of safety can be achieved if this duplication is avoided.

II. Request to the ADN Safety Committee

4. CEFIC and FuelsEurope invites the ADN Safety Committee to take note of the above and to give an opinion.

5. The Safety Committee is further invited to mandate the informal working group on substances to investigate the options for this simplification (i.e. by modifying remark 44), taking into account other proposed ADN 2021 changes to this remark as referred to in above mentioned related document.
