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|  | **INF.33** | |
| **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)**  **Twenty-sixth session**  Geneva, 27-30 January 2015  Agenda item 5 (b)  **Proposals for amendments to the Regulations annexed to ADN:**  **Other proposals** | | English  **26 January 2015** |

Opinion

Cargo-loading calculation software

Submitted by the CEFIC (European Chemical Industry Council)

**With reference to the INF paper submitted by EBU CCNR-ZKR/ADN/WP.15/AC.2/26/INF4 we would like to deliver the following opinion:**

1. In 9.3.2.13.3 the ADN only prescribes the use of certified cargo-loading computers in the shipping industry for calculating stability if it was not specifically possible to take account of all cargo loading cases and ballast cases.

Stability can also be calculated manually. This is however exceedingly complicated and is typically undertaken by the classification societies.

The certified cargo-loading computer is only intended as an aid for the skipper in order to evaluate the various loading conditions in the tanks as regards stability and solidity if these do not appear in the stability manuals.

2. From the current perspective, skippers can typically only apply the load conditions described in the stability manuals. From our perspective it is not therefore appropriate to extend the transitional period. Instead the focus should be on rectifying the problems as quickly as possible.

3. We also take a critical stance on extending the transitional period as regards the accident involving the “Waldhof”.