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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)

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Item 4 (b) of the provisional agenda

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

Proposals connected with the entry into force of the Convention on Collection, Storage and Disposal of Waste Generated during Navigation on the Rhine and Other Inland Waterways (CDNI)

Transmitted by the European Barge Union (EBU)^{1, 2}

Background

1. Following the entry into force of the Convention on Collection, Storage and Disposal of Waste Generated during Navigation on the Rhine and Other Inland Waterways (CDNI) on 1 November 2009, EBU considers that some provisions regarding waste in the Regulations annexed to ADN should be amended. It invites the Safety Committee to discuss four series of proposals to this effect.

¹ Distributed in German by the Central Commission for the Navigation of the Rhine (CCNR) under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2010/9.

² In accordance with the programme of work of the Inland Transport Committee for 2006–2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (b)).

I. Application of the current ADN provisions

Proposal No. 1

2. The Regulations annexed to ADN contain the following NOTE in several places: "It is not necessary to apply this paragraph. The date of application will be defined later." The entry into force of these items should be guided by the requirements of CDNI.

3. The concerned items are:

<i>Paragraph</i>	<i>Subject</i>
7.2.4.15	Measures to be taken after unloading
8.1.2.3 (j)	The inspection certificate for the additional stripping installation
8.1.6.6	Test of the stripping system
8.6.4	Discharge of residual quantities
9.3.2.25.2 (f) and 9.3.3.25.2 (f)	Device for the discharge of residual quantities
9.3.2.25.2 (g) and 9.3.3.25.2 (g)	Installation of an additional stripping system
9.3.2.25.10 and 9.3.3.25.10	Additional stripping system test
9.3.2.26 and 9.3.3.26	Residual cargo and slop tanks

4. EBU requests the deletion of the NOTE referred to in paragraph 2, above, in the places mentioned in paragraph 3.

Justification

5. CDNI entered into force on 1 November 2009.

Proposal No. 2

6. The NOTE referred to in paragraph 2, above, also appears in connection with the loading journal in the following places:

<i>Paragraph</i>	<i>Subject</i>
7.2.4.11.1	Entries in the loading journal
8.1.10	Loading journal

Putting the items into force with immediate effect would result in there being, in part, a dual requirement under ADN: all vessels licensed to carry UN No. 1203 should have a loading journal, in addition to a register of operations during carriage in accordance with 8.1.11 and 7.2.4.12. Moreover, 8.1.10 requires a loading journal in accordance with the provisions of the European Code for Inland Waterways (CEVNI).

7. EBU requests that the NOTE referred to in paragraph 2 should be maintained in the places mentioned in paragraph 6, above.

Justification

8. CEVNI currently has no model or requirements relating to a loading journal.
9. In the States that are Contracting Parties to CDNI, an unloading certificate must also be completed after unloading the cargo. The short- and medium-term objectives must be to agree on a single document to replace the register, the loading journal and the unloading certificate.
10. This is not yet possible because, for environmental — not safety — reasons, information on gas-freeing is required in the register and the unloading journal. The CDNI unloading certificate, which is in fact the appropriate official document, cannot require such information as gas-freeing is not yet covered by CDNI. It is planned to extend CDNI to cover this area.
11. Once this is done:
- (a) The loading journal can be put into force;
 - (b) The register of operations during carriage can be eliminated;
 - (c) The unloading certificate can refer to the loading journal; and
 - (d) The loading journal can be introduced in CEVNI.
12. In the meantime, the NOTE referred to in paragraph 2, above, should be maintained in 7.2.4.11.1 and 8.1.10.

II. Definitions

13. In 1.2.1 of the Regulations annexed to ADN there are definitions which do not correspond to those of the Convention on Collection, Storage and Disposal of Waste Generated during Navigation on the Rhine and Other Inland Waterways (CDNI).

The following table sets out the differences:

<i>Term</i>	<i>ADN, 2009 version (see section 1.2.1)</i>	<i>Convention on Collection, Storage and Disposal of Waste Generated during Navigation on the Rhine and Other Inland Waterways</i>
Residual cargo	Liquid cargo remaining in the cargo tank or cargo piping after unloading without the use of the stripping system	Liquid cargo remaining in the tanks or in the piping after unloading without the use of a stripping system
Cargo residues	See <i>Slops</i>	Liquid cargo which cannot be removed from the tanks or piping using the stripping system
Cargo remains	Undefined in English version	undefined

<i>Term</i>	<i>ADN, 2009 version (see section 1.2.1)</i>	<i>Convention on Collection, Storage and Disposal of Waste Generated during Navigation on the Rhine and Other Inland Waterways</i>
Stripping system (efficient)	A system for draining the cargo tanks and stripping the cargo piping except for the cargo remains and residues	System in accordance with appendix II for draining and stripping as fully as possible the tanks and piping except for the cargo residues which cannot be removed using a stripping system
Slops (cargo residues)	Liquid cargo residues which cannot be removed from the cargo tank or cargo piping by discharging, draining or stripping; by extension, a mixture of cargo residues and washing water, rust, etc., which is either suitable or not for pumping	Mixtures of cargo residues with washing water, rust or mud, whether or not suitable for pumping

Proposal No. 3

14. EBU proposes the following definitions in ADN to take account of the definitions set out in the above-mentioned CDNI Convention:

The following table sets out the differences:

<i>Term</i>	<i>ADN, definitions proposed for the 2011 version</i>	<i>Convention on Collection, Storage and Disposal of Waste Generated during Navigation on the Rhine and Other Inland Waterways (CDNI)</i>
Residual cargo	Liquid cargo remaining in the cargo tank or cargo piping after unloading without the use of the stripping system (unchanged)	Liquid cargo remaining in the tanks or in the piping after unloading without the use of a stripping system
Cargo residues	Liquid cargo which cannot be removed from the tanks or cargo piping using the stripping system	Liquid cargo which cannot be removed from the tanks or piping using the stripping system
Cargo remains	Delete in French version Undefined in English version	Undefined
Stripping system (efficient)	A system for draining and stripping as fully as possible the cargo tanks and the cargo piping except for the cargo residues which cannot be removed using a stripping system	System in accordance with appendix II for draining and stripping as fully as possible the tanks and piping except for the cargo residues which cannot be removed using a stripping system
Slops	Mixtures of cargo residues with washing water, rust or mud, whether or not suitable for pumping	Mixtures of cargo residues with washing water, rust or mud, whether or not suitable for pumping

Justification

15. Convergence of definitions is important since the two sets of regulations overlap.

Proposal No. 4

16. In CDNI, “exclusive transport operations” are defined as follows:

“exclusive transport operations”: successive transport operations during which the same cargo or another cargo, the carriage of which does not require the prior cleaning of holds or tanks, is carried in the vessel’s hold or cargo tank”.

17. EBU requests that this definition relating to exclusive transportation operations be introduced in ADN.

Justification

18. The term “exclusive transport operations” is used in connection with the stripping system.

III. Additional stripping systems

19. In paragraphs 9.3.2.25.2 and 9.3.3.25.2 of the Regulations annexed to ADN, the following sentence appears in (g):

“The vessel shall be equipped with an additional stripping system.”

Proposal No. 5

20. EBU requests that a sentence be added, as follows:

“The vessel shall be equipped with an additional stripping system. Vessels that are engaged only in exclusive transport operations are exempt from this requirement.”

Justification

21. Some vessels are engaged only in exclusive transport operations during their entire service life.

22. Additional stripping systems are ineffective for some highly viscous substances carried in exclusive transport operations.

23. Given these circumstances, it is unreasonable to require an additional stripping system in such cases.

Proposal No. 6

24. The test of the additional stripping system is regulated in 8.6.4. The quantities not to be exceeded during the test of the additional stripping system are set out in 9.3.2.25.10 and 9.3.3.25.10, as follows:

(a) Under 9.3.2.25.10 : 5 litres for each cargo tank and 15 litres for each pipe system;

(b) Under 9.3.3.25.10 : 5 litres for each cargo tank and 15 litres for each pipe system.

25. The quantities mentioned in 9.3.2.25.10 are consistent with CDNI. No amendment is necessary here.

26. EBU requests that paragraph 9.3.3.25.10 be subdivided into single-hull vessels and double-hull vessels and that the quantity limits be set as follows:

“The following residual quantities shall not be exceeded:

Double-hull vessels

- (a) 5 litres for each cargo tank;
- (b) 15 litres for each pipe system.

Single-hull vessels

- (a) 20 litres for each cargo tank;
- (b) 15 litres for each pipe system.

...

Justification

27. The quantities, not yet in force, currently indicated in ADN for type N vessels are wrong. There should be consistency between ADN and CDNI. Given that type N vessels can have single or double hulls, it is necessary to differentiate between the two in 9.3.3.25.10.

Proposal No. 7

28. EBU requests that transitional provisions be included up to the end of 2014 in 9.3.2.25.10 and 9.3.3.25.10.

Justification

28. CDNI allows the navigation profession five years to install and certify additional stripping systems. ADN should not be stricter in this area.

IV. Residual cargo tanks

Proposal No. 8

30. EBU proposes that the requirements concerning residual cargo tanks should read as follows:

<i>ADN</i>	<i>Current text</i>	<i>EBU proposal</i>	<i>Justification</i>
9.3.2.26	Residual cargo tanks and slop tanks	Residual cargo tanks and slop tanks	
9.3.2.26.1	The vessel shall be provided with at least one residual cargo tank and with slop tanks for slops which are not suitable for pumping.	When a vessel is equipped with a permanently installed residual cargo tank intended for collecting slops or washing water from the residual cargo, the tank shall be equipped in accordance with 9.3.2.26.4.	Not all vessels require a permanently installed residual cargo tank. If the vessel is equipped with a permanently installed residual cargo tank, the tank must meet the requirements.
	These tanks shall be located only in the cargo area.	Residual cargo tanks and slop tanks for slops which are not suitable for pumping shall be	

<i>ADN</i>	<i>Current text</i>	<i>EBU proposal</i>	<i>Justification</i>
	...	located only in the cargo area. unchanged	
9.3.2.26.4	The residual cargo tank shall be equipped with: - pressure-relief and vacuum relief valves. The high velocity vent valve shall be so regulated as not to open during carriage. This condition is met when the opening pressure of the valve meets the conditions set out in column (10) of Table C of Chapter 3.2. Intermediate bulk containers (IBCs), tank containers and portable tanks intended to collect cargo remains, cargo residues or slops shall be equipped with: Unchanged	The residual cargo tank shall be equipped with: - pressure-relief and vacuum relief valves The <u>pressure relief valve</u> shall be so regulated as not to open during carriage. This condition is met when the opening pressure of the valve meets the conditions set out in column (10) of Table C of Chapter 3.2. Intermediate bulk containers (IBCs), tank containers and portable tanks intended to collect cargo remains, cargo residues, slops or washing water shall be equipped with: Unchanged	If flame-arresters capable of withstanding steady burning are considered adequate for relieving pressure in cargo tanks and extracting gas while the vessel is under way, more should not be required in the case of residual cargo tanks, a requirement which in this case is not effective. Washing water is missing from the current list.
9.3.3.26	Residual cargo tanks and slop tanks	Residual cargo tanks and slop tanks	
9.3.3.26.1	The vessel shall be provided with at least one residual cargo tank and with at least one slop tank [for slops which are not suitable for pumping] [text in square brackets missing from French version]. These tanks shall be located only in the cargo area. ...	When a vessel is equipped with a permanently installed residual cargo tank intended for collecting slops or washing water from the residual cargo, the tank shall be equipped in accordance with 9.3.2.26.4. Residual cargo tanks and slop tanks <u>for slops which are not suitable for pumping</u> shall be located only in the cargo area.	Not all vessels require a permanently installed residual cargo tank. If the vessel is equipped with a permanently installed residual cargo tank, the tank must meet the requirements.

<i>ADN</i>	<i>Current text</i>	<i>EBU proposal</i>	<i>Justification</i>
9.3.3.26.4	The residual cargo tanks shall be equipped with: in the case of an open system: ... unchanged in the case of a protected system: ... unchanged in the case of a closed system: text as in 9.3.2.26.4 -	The residual cargo tanks shall be equipped with: in the case of an open system: ... unchanged in the case of a protected system: ... unchanged in the case of a closed system: text as in 9.3.2.26.4	same justification as in 9.3.2.26.4

Proposal No. 9

31. The following addition should be made to paragraph 7.2.4.1.1:

<i>ADN</i>	<i>Current text</i>	<i>EBU proposal</i>	<i>Justification</i>
7.2.4.1	Limitation of the quantities carried	Limitation of the quantities carried	
7.2.4.1.1	The carriage of packages in the cargo area is prohibited. This prohibition does not apply to: - residual cargo, cargo residues and slops in	The carriage of packages in the cargo area is prohibited. This prohibition does not apply to: - residual cargo, cargo residues, washing water and slops in ...	The notion of “washing water” should be added for clarification.