

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-fifth session****Geneva, 25–29 August 2014****Item 5 of the provisional agenda****Reports of informal working groups**

Remarks on the Report of the Informal Working Group on “Explosion safety” (INF.15)**Transmitted by the Government of the Netherlands****Introduction**

1. On 7th and 8th of July the Informal Working Group on “Explosion Safety” held its sixth meeting. During this (and the previous) meeting of the Informal Working Group possible changes to the current concept of explosion safety were discussed.

The mandate was given at the 20th session of the ADN Safety Committee based on Informal document (WP.15/AC.2/20/INF12, Germany and the Netherlands) as mentioned in the Report ECE/TRANS/WP.15/AC.2/42, para. 40.

2. Those dealing with protection against explosion on board vessels carrying dangerous goods are possibly the most important provisions concerning safety in the ADN. Therefore, any changes and certainly a fundamental change of the concept in use has to be presented transparently and discussed thoroughly.
3. However in the opinion of the Dutch delegation, the current Report of the Informal Working Group reflects only in part the discussions and opinions expressed in the Group. Therefore an INF-document reflecting on the Report was seen appropriate to present the ADN Safety Committee with the key issues discussed and to avoid misunderstandings.

Key discussion within the Informal Working Group on “Explosion Safety”

4. Key discussions during the fifth and sixth meeting of the Group have been whether or not to adopt the Explosion Safety Concept of ADN 1995, a concept also called the “Substance-related concept”. This concept only takes into account the scenario or vapours released by the cargo. Only for this

scenario measures have to be taken, and any provisions against explosion safety will only be linked to the properties of the cargo.

This is contrary to the concept of explosion protection currently used in ADN 2013. The concept in AND 2013 takes into account two hazardous scenarios. The first is the possibility of dangerous gases on the vessel released by the cargo. The second scenario is when the vessel is moored at a terminal and dangerous gases released by the terminal approach the vessel. The relevant provisions in ADN 2013 are in part linked to the type of vessel and in part linked to the properties of the cargo.

5. The informal working group seems to have a split opinion about whether or not to adopt the ADNR 1995 concept as an alternative to the current concept.

During the fifth meeting, two of the three voting parties present were against the adoption of the ADNR 1995 concept. During the sixth meeting, only two voting parties were present. Of the other parties attending some would like to keep protection measures against gases from the terminal, maintain a certain standard protection against explosion whether or not the vessel is carrying EX-substances. Others would like to have these deleted and to focus on gases from the cargo only.

However, this issue was discussed during the meeting of the ADN Committee in January 2014 and decided upon. The second part of the proposal by EBU (INF.32) was firmly rejected. The proposal was to allow equipment of a “non-explosion safe type” when the vessel is carrying a non-EX substance. Also EUROPIA had responded to the proposal of EBU with its INF-paper INF.33. A vessel moored in a terminal without explosion protection causes (according to EUROPIA) large risks, and is not in compliance with the European ATEX regulation.

See also the Report of the 24th session of ADN Safety Committee (ECE/TRANS/WP.15/AC.2/50, para. 64). This position was confirmed under Agenda Item 6, in the Report of Informal Working Group on Explosion Protection on tank vessels. See ECE/TRANS/WP.15/AC.2/50, para. 73: “*The Safety Committee felt that protection measures against explosion had to be linked to the type of vessel, (...)*”.

6. However, in the informal working group there has been an ongoing debate on this issue. This is acknowledged in para. 3 of the Report of the Informal Working Group on “Explosion safety” (INF.15).
7. It is in this context that the Dutch delegation would like to refer to phrases and questions in the report such as for example under paragraph 1.3 “*The fact this substance-related concept is not consequentially realized (...)*”, “*For example in 9.3.2.52.1 a) or 9.3.2.52.3 a) explosion protected equipment is required. Which equipment to choose?* and under 4, “*For example should there be a fundamental demand on explosion safety - independent of the carried goods?*” which are not recognized and seem to be based on the implicit assumption that the decision to adopt the Explosion concept of ADNR 1995 has already been taken. Which is, as mentioned under 6, not the case.

Proposal on how to proceed

8. Besides the remarks made above, the Dutch delegation acknowledges some adjustments to the current provisions on explosion safety are useful. For example some have already been decided upon for AND 2015 (amending 9.3.x.22.4 a. for example).
9. As already mentioned earlier, explosion safety is an important issue on board. Any proposals to amend the current concept and provisions should make clear why they are necessary, and what the consequences are.

The Dutch delegation therefore supports a clear discussion within the ADN Committee about the question:

“Should the current concept of explosion safety be changed to a concept which does not take into account possible shore side explosion risks?”
