

Economic Commission for Europe

Inland Transport Committee

21 January 2016

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-eighth session

Geneva, 25 - 29 January 2016

Item 5 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN

Other proposals

Comments about the document ECE/TRANS/WP.15/AC.2/2016/18

Subsection 1.4.3 - ADN

Transmitted by the Recommended ADN Classification Societies

The Recommended Classification Societies have some comments about the Items 12 and 16 of the document in reference.

Text :

Quote

12. *In 9.3.2.25.9 and 9.3.3.25.9, amend in each case the last sentence as follows:*

“The permissible maximum loading and unloading pressure for each cargo tank or for each group of cargo tanks shall be given in an on-board instruction approved by the classification society that certified the vessel.”

16. *The amendment in paragraph 11 above describes and clarifies for the first time who is responsible for the technically correct formulation of the loading and unloading instructions. It must be the classification society that certified the boat, because it is also that society that approves the design of cargo tanks and piping as part of the ADN monitoring procedure, and in accordance with its own rules for construction.*

Unquote

Comments :

1. We understand that it will be asked by the amendment that the instruction would be approved by the Classification Society that certified the vessel. The Classification Societies consider this proposal as not appropriate (in particular with the items 12 and 16).

The instructions on board are an operational issue in which a classification society is not involved. Consequently, the corresponding responsibility cannot be taken by it.

Up till now it's the responsibility of the ship owner or it's safety advisor to make sure these instructions are made, are correct and sufficient.

Apart from this, it's also not clear which requirements have to be included in these instructions.

2. It is not correct to say that the "approval of these loading and unloading instructions is consistent with current practice".

For the time being the Classification Societies "examine" the pressure drop calculation submitted to them and this examination is limited to this calculation; this calculation is done by an engineering office in view to determine a maximum (un-) loading rate, as required in the first sentence of 9.3.2.25.9 ("The permissible loading and unloading flows shall be calculated").

3. The last remark concerns the translation of the prescription. There is a more or less big difference between the German and the English version of ADN.

In the German version of ADN is written under 9.3.2.25.9 last sentence:

"Die maximal zulässige Lade- und Löschrate pro Ladetank oder pro Ladetankgruppe ..."
(free translation: The permissible maximum loading and unloading flows for each cargo tank or for each group of cargo tanks ...)

But in the English and French versions we found respectively the following text:

"The permissible maximum loading and unloading pressure for each cargo tank or for each group of cargo tanks ..."

"La pression maximale admissible de chargement et de déchargement pour chaque citerne à cargaison ou pour chaque groupe de citernes à cargaison doit figurer dans une instruction à bord."

This difference between the languages version didn't exist in the last version of the ADNR:

(a) In ADNR-2009-FR :

"Le débit maximal admissible de chargement et de déchargement pour chaque citerne à cargaison ou pour chaque groupe de citernes à cargaison doit figurer dans une instruction à bord.";

(b) In ADNR-2009-GE :

"Die maximal zulässige Lade- und Löschrate pro Ladetank oder pro Ladetankgruppe sind in einer Instruktion an Bord mitzuführen."

We propose that the right text have to be "... loading and unloading flows ..." for the English version and "...débit maximal admissible de chargement et de déchargement ..." for the French version.