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**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) (ADN Safety Committee)**

**Thirtieth session**

Geneva, 23-27 January 2017

Item 4 (c) of the provisional agenda

**Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): Interpretation of the Regulations annexed to ADN**

**7.2.4.1.1 of ADN, carriage of packages on board tank vessels**

**Transmitted by the Government of Germany\*\*\***

*Summary*

|                            |   |
|----------------------------|---|
| <b>Executive summary:</b>  | 7.2.4.1.1 ADN, in conjunction with sub-section 7.2.4.14 ADN, authorizes the carriage in tank vessels of specific types of packages, namely receptacles for residual products and receptacles for slops. It might not be clear that, even on a tank vessel, such packages must be carried in accordance with the conditions of carriage for packages as applied to transport on dry cargo vessels. |
| <b>Action to be taken:</b> | Discussion in the ADN Safety Committee<br>Inclusion of proper interpretation in the report of the meeting.  |
| <b>Related documents:</b>  | ECE/TRANS/WP.15/AC.2/2016/30<br>ECE/TRANS/WP.15/AC.2/2016/34<br>ECE/TRANS/WP.15/AC.2/60, para. 13   |

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\*\* In accordance with the programme of work of the Inland Transport Committee for 2016-2017 (ECE/TRANS/2016/28/Add.1 (9.3.)).

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## I. Introduction

1. The question of interpretation mentioned in the summary was submitted by the German delegation to the Safety Committee for consideration at its twenty-ninth session. The Safety Committee was of the view that this was a complex issue and would require more in-depth discussion at the thirtieth session.

2. At the same session, the Safety Committee, in the context of the reorganization of explosion protection on the basis of document ECE/TRANS/WP.15/AC.2/2016/30, adopted for ADN 2019 the following amendments to subsection 7.2.4.1 of ADN as referred to above, and to the definitions of receptacles for residual products and receptacles for slops in 1.2.1 ADN:

“The carriage of packages in the cargo area is prohibited. This prohibition does not apply to:

- residual cargo, washing water, cargo residues and slops contained in not more than six approved receptacles for residual products and receptacles for slops having a ~~maximum individual~~ an overall capacity of not more than 12 m<sup>3</sup>. ~~These receptacles for residual products shall meet the requirements of international regulations applicable to the substance concerned.~~ The receptacles for residual products and the receptacles for slops shall be properly secured in the cargo area, be located at a minimum distance from the hull equal to one quarter of the vessel's breadth and comply with the provisions of 9.3.2.26.4-3 or 9.3.3.26.-4-3 ~~concerning them~~;
- to cargo samples, up to a maximum of 30, of substances accepted for carriage in the tank vessel, where the maximum contents are 500 ml per receptacle. Receptacles shall meet the packing requirements referred to in Part 4 of ADR and shall be placed on board, at a specific point in the cargo area, such that under normal conditions of carriage they cannot break or be punctured and their contents cannot spill in the hold space. Fragile receptacles shall be suitably padded.”

“Receptacle for residual products means an ~~tank~~ intermediate bulk container (IBC) or tank-container or portable tank intended to collect residual cargo, washing water, cargo residues or slops which are suitable for pumping; the receptacles shall be certified according to ADR, RID or the IMDG code and authorized for the substance concerned. The maximum permissible capacity of an intermediate bulk container is 3 m<sup>3</sup>, that of a tank-container or portable tank is 12 m<sup>3</sup>.”

“Receptacle for slops means a fire resistant steel drum ~~recipient~~ capable of being closed with lids intended to collect slops which are unsuitable for pumping. The receptacle shall be approved according to ADR, RID or the IMDG code and authorized for the substance concerned. The maximum permissible capacity is 450 l. It should be easy to handle and marked “SLOP” (character height.: 0.10m).”

3. With this document, Germany would like to resubmit its question of interpretation for consideration in light of those amendments.

## II. Question of interpretation

4. Paragraph 7.2.4.1.1 ADN provides the possibility of carrying, on board tank vessels also, specific types of packages containing dangerous goods.

5. The receptacles used for these packages must, in accordance with the definitions, be certified as packagings under ADR, RID or the IMDG code and authorized for the substance being transported in the packages.

6. In order to correctly interpret these requirements, the question arises whether these packages, “receptacles for residual products” and “receptacles for slops” ought also to be transported in accordance with the requirements for the carriage of packages on dry cargo vessels (e.g., transport document, marking of containers, tank-containers, portable tanks).

7. If that is the case, then for carriage in intermediate bulk containers (IBCs), subsection 1.1.3.6 of ADN could be applied, with exemptions depending on the quantities carried. In particular paragraphs 1.1.3.6.2 (a), (b), (c) and (e) of ADN.

8. 1.1.3.6.2 (d) would not apply, as tank vessels do not have holds. Receptacles for residual products are stored on the bridge. Thus, the words “in the cargo area” should be inserted.

9. Subsections 1.1.4.1 and 1.1.4.2 of ADN contain references to the requirements for packages under ADR, RID and the IMDG code, notably also for the marking of packages in accordance with chapter 5 of ADN. (Note: 1.1.4.1 (a) and (b) confirm that this applies also to the definitions of receptacles for residual products and receptacles for slops.)

10. Section 1.2.1 ADN contains the definition of a “package”.

11. Section 1.4.3 ADN lists certain obligations of participants in the carriage of packages.

12. Section 5.4.1 ADN contains requirements for transport documents for packages.

### III. The position of Germany

13. The receptacles for residual products and receptacles for slops will be mentioned after the following introduction:

“7.2.4.1.1 The carriage of packages in the cargo area is prohibited. This prohibition does not apply to:”

Packages are defined in 1.2.1 of ADN. For the carriage of packages, there are requirements for transport of the same order as for carriage in tanks.

There is no immediately obvious reason why dangerous goods loaded in receptacles for residual products and receptacles for slops should be exempt from chapter 1.3 of ADN.

14. The carriage of IBCs as receptacles for residual products and receptacles for slops may for the most part be exempt from the other provisions of ADN by virtue of subsection 1.1.3.6 of ADN. The requirement for certification of receptacles continues to apply in all cases.

For tank containers carrying a large volume of dangerous goods (up to 12 m<sup>3</sup>) there are safety reasons for applying the other requirements for transport in tank containers or portable tanks also to carriage of receptacles for residual products under 7.2.4.1.1 of ADN.

15. As to the carriage of residues of a different cargo in a receptacle for residual products or slops, the informal working group on substances could be invited to propose the best UN numbers or substance codes to use.

16. The Safety Committee could definitely consider linking this issue to the review of requirements governing the carriage of cargo residues in tanks for residual products (see 1.2.1, definition of “tank for residual products”, 7.2.1.21.1, 7.2.2.0.1, 7.2.4.14, 7.2.4.15.1, 9.3.x.26.1 and 5.4.1 of ADN).