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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

Thirty-first session

Geneva, 28-31 August 2017

Item 4 (b) of the provisional agenda

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

ADN 9.3.2.22.5 (a), venting piping (on board)

Transmitted by the Government of Germany* **

Summary

Executive summary: The report on the twenty-fourth session of the ADN Safety Committee contains an amendment that is not in line with the amendment proposal submitted by Germany and does not reflect the outcome of the discussion, which was not noticed during the consideration of the report, resulting in its incorporation into ADN 2015. This was noticed only recently.

This misleading amendment to ADN — with the effect that the flame arrester in the venting piping is no longer required to be fitted with a spring-loaded plate stack and the pressure-measuring device is no longer required to be fitted with an alarm system — entails a safety risk and should therefore be corrected without delay.

Action to be taken: Correction of ADN 9.3.2.22.5 (a) in all language versions, effective retroactively from 1 January 2015.

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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.)).



Related documents:	ECE/TRANS/WP.15/AC.2/2014/17 ECE/TRANS/WP.15/AC.2/50/Add.1
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I. Introduction

1. During the twenty-fourth session of ADN, the delegation of Germany submitted a proposal to amend ADN 9.3.2.22.5 (a), contained in document ECE/TRANS/WP.15/AC.2/2014/17.
2. It had been proposed to delete the penultimate sentence of ADN 9.3.2.22.5 (a). This sentence was worded as follows: “When a fire-fighting installation is permanently mounted on deck in the cargo area [in French and English only: and can be brought into service from the deck and from the wheelhouse], flame arresters need not be required for individual cargo tanks.”
3. In annex 1 to the report on the session, contained in document ECE/TRANS/WP.15/AC.2/50/Add.1, it is mentioned, instead of this amendment, the deletion of indent (v), whereas the sentence that we had proposed to delete was maintained.

II. Proposal

4. Germany proposes that ADN 9.3.2.22.5 (a) be corrected, with retroactive effect from 1 January 2015, as follows:

“9.3.2.22.5 (a) Insofar as anti-explosion protection is prescribed in column (17) of Table C of Chapter 3.2, venting piping connecting two or more cargo tanks shall be fitted, at the connection to each cargo tank, with a flame arrester with a fixed or spring-loaded plate stack, capable of withstanding detonation. This equipment may consist of:

(i) – (iv) ... (those paragraphs remain unchanged)

(v) ~~(Deleted):~~ a flame arrester with a spring-loaded plate stack, where the pressure measurement device is fitted with an alarm system in accordance with 9.3.3.21.7.

~~When a fire-fighting installation is permanently mounted on deck in the cargo area and can be brought into service from the deck and from the wheelhouse, flame arresters need not be required for individual cargo tanks.~~

Only substances which do not mix and which do not react dangerously with each other may be carried simultaneously in cargo tanks connected to a common venting piping;

or”.

III. Justification

5. The amendment is thus brought into line with the proposal submitted by Germany and the results of the discussion in the ADN Safety Committee.

IV. Safety

6. The absence of a specified flame arrester and alarm system on the pressure measurement device would lower the level of safety. The intention of Germany when it made its proposal was not for it to result in a decrease in the level of safety.

V. Implementation

7. We believe that, in the period since 1 January 2015, the requirement under subparagraph (v) of ADN 9.3.2.22.5 has been met during the construction of new vessels. If this has not been the case, the Safety Committee might consider an appropriate transitional period, for example upon the renewal of the certificate of approval.
