
Economic Commission for Europe**Inland Transport Committee**

28 June 2018

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-third session**

Geneva, 27–31 August 2018

Item 3 (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

Measurements for degassing**Transmitted by the governments of Austria and the Netherlands****Introduction**

1. 7.2.4.25.5 of ADN 2017 has been amended at the last meeting of the Safety Committee with a requirement regarding measurements. The text reads now:

“7.2.4.25.5 The gas/air mixtures released during loading operations shall be returned ashore through a vapour return piping if:

- a closed cargo tank is required according to column (7) of Table C of Chapter 3.2; or
- a closed cargo tank was required for the previous cargo in column (7) of Table C of Chapter 3.2 and before the loading the concentration of flammable gases of the previous cargo in the cargo tank is above 10% of the LEL or the cargo tank contains toxic gases, corrosive gases (packing group I or II) or gases with CMR-characteristics (Categories 1A or 1B) in a concentration above national accepted exposure levels, the results of these measurements shall be recorded in writing.”

2. A possible interpretation of the text would be that the results of the measurements have only to be recorded if the values are above the thresholds.

3. But it would be much more important to record the measurements if the values are lower than the thresholds and the gases are not returned ashore therefore. If the law enforcement agency detects loading without vapour return, it should be possible to prove that there has been a measurement as a basis for this decision.

4. Carriers argue that the purpose of the measurement is to decide whether vapour return is necessary or not. If vapour return is used voluntarily it would not be necessary to do a measurement.

Possible solutions

5. The text of 7.2.4.25.5 could be corrected to read:

“7.2.4.25.5 The gas/air mixtures released during loading operations shall be returned ashore through a vapour return piping if:

- a closed cargo tank is required according to column (7) of Table C of Chapter 3.2; or
- a closed cargo tank was required for the previous cargo in column (7) of Table C of Chapter 3.2. The returning ashore through the vapour return piping is not necessary if and before the loading the concentration of flammable gases of the previous cargo in the cargo tank is ~~above~~ not more than 10% of the LEL or and the cargo tank does not contain ~~contains~~ toxic gases, corrosive gases (packing group I or II) or gases with CMR-characteristics (Categories 1A or 1B) in a concentration above national accepted exposure levels, and the results of these measurements ~~shall be~~ are recorded in writing.”

6. This text would describe the original intention of the amendment and would therefore be a correction of a wording that could otherwise lead to misinterpretations.

7. The Safety Committee has to decide whether this can be adopted as an editorial correction for ADN 2019 or has to be postponed to ADN 2021.

8. If the correction cannot enter into force in ADN 2019 the Austrian and Dutch delegation request the Safety Committee to record the correct harmonized interpretation of the existing text in the minutes of the meeting and on the website of the UNECE.
