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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)

**REPORT OF THE JOINT MEETING OF EXPERTS ON THE REGULATIONS  
ANNEXED TO THE EUROPEAN AGREEMENT CONCERNING THE  
INTERNATIONAL CARRIAGE OF DANGEROUS GOODS BY INLAND  
WATERWAYS (ADN SAFETY COMMITTEE)  
ON ITS FIFTEENTH SESSION<sup>1</sup>**

held in Geneva from 24-28 August 2009

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<sup>1</sup> Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/32.



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<sup>2</sup> For practical reasons, Annex I will be issued as an addendum to the present document with the symbol ECE/TRANS/WP.15/AC.2/32/Add.1.

## **I. ATTENDANCE**

1. The 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) held its fifteenth session in Geneva from 24 to 28 August 2009 under the chairmanship of Mr. H. Rein (Germany) and the vice-chairmanship of Mr. B. Birkhüber (Austria). Representatives of the following countries took part in the work of the session: Austria, Belgium, Cyprus, France, Germany, Netherlands, Russian Federation and Switzerland. The European Commission was also represented. The following intergovernmental organizations were also represented: Central Commission for the Navigation of the Rhine (CCNR) and Danube Commission. The following non-governmental organizations were also represented: European Barge Union (EBU), International Association of Classification Societies (IACS), European Chemical Industry Council (CEFIC) and the International Committee for the Prevention of Work Accidents in Inland Navigation (CIPA).

## **II. ADOPTION OF THE AGENDA** (agenda item 1)

Documents: ECE/TRANS/WP.15/AC.2/31 and Add.1

Informal document: INF.1 (Secretariat)

2. The Joint Meeting adopted the agenda as prepared by the secretariat.

## **III. SEVENTY-FIRST SESSION OF THE INLAND TRANSPORT COMMITTEE** (agenda item 2)

Documents: ECE/TRANS/206 Report of the Inland Transport Committee  
ECE/TRANS/2009/6-9 Review of gender issues in transport

3. The Safety Committee noted that the requests by the Inland Transport Committee had already been considered by the Working Party on the Transport of Dangerous Goods (see ECE/TRANS/WP.15/201, paras. 7-14).

4. The Safety Committee pointed out that no gender-based discrimination existed in the regulations governing inland navigation. However, social protection measures applicable to pregnant women or relating to maternity did exist.

5. The Safety Committee felt that the nature of its work did not allow it to contribute to efforts to combat global warming, since the transport of dangerous goods did not have a particular influence on such warming.

6. The Chairman said that intelligent transport systems were being dealt with by the RID/ADR/ADN Joint Meeting and that security in the transport of dangerous goods was covered by specific provisions of ADN. An evaluation of such security provisions in the countries of the European Union had been published by the European Commission (see also ECE/TRANS/WP.15/201, paras. 43-47).

**IV. STATUS OF THE EUROPEAN AGREEMENT CONCERNING THE INTERNATIONAL CARRIAGE OF DANGEROUS GOODS BY INLAND WATERWAYS (ADN) (agenda item 3)**

7. The Safety Committee noted that, since the fourteenth session, Croatia had become a party to ADN, thus bringing the number of Contracting Parties to 11 (Austria, Bulgaria, Croatia, France, Germany, Hungary, Luxembourg, Netherlands, Republic of Moldova, Romania and Russian Federation).

8. The representative of Switzerland said that the ratification procedure was under way in his country and that Switzerland hoped to become a Contracting Party by the end of 2010.

9. The Safety Committee noted that the consolidated version of ADN (ADN 2009) in Russian was now available and would be issued shortly.

10. The Safety Committee noted that the corrections to the Agreement and to the annexed regulations adopted by the Administrative Committee at its previous session had been accepted by the Contracting Parties (see depositary notifications C.N.482.2009.TREATIES-5 and C.N.481.2009.TREATIES-4). The Safety Committee noted that the secretariat had also issued a corrigendum to the consolidated version of ADN 2009 (ECE/TRANS/203/Corr.1).

**V. PROPOSALS FOR AMENDMENTS TO THE REGULATIONS ANNEXED TO ADN (agenda item 4)**

**A. Report of the "Substances" informal working group**

Document: ECE/TRANS/WP.15/AC.2/2009/27 (Germany)

11. The Safety Committee adopted the amendments and corrections to tables A and C of chapter 3.2 of the annexed regulations, with the exception of the correction proposed for UN No. 1589 and with the addition of the code EP for UN No. 1463 (see annex I).

12. The Safety Committee also approved the amendments to the criteria for including provisions in table A, but it was noted that those criteria did not appear in the annexed regulations or in any official document of the Committee.

13. The representative of CCNR was requested to prepare a document setting out the criteria in question.

14. With regard to the proposal to extend the criteria for requiring a toximeter (TOX) to cover solid substances of Class 4.3 which emitted toxic gases (and not flammable gases, as indicated in the English, French and Russian versions of the document) when they came in contact with water, a member of the ECE secretariat pointed out that no harmonized criteria covering that type of hazard currently existed. The Safety Committee was of the view that until such criteria were available, it might be possible to proceed on a case-by-case basis, at least in the case of substances that were known to emit toxic gases upon contact with water.

**Ammonia solution (UN No. 2672)**

Document: ECE/TRANS/WP.15/AC.2/2009/32 (Germany)

15. The proposal to divide the existing entry in table C into two separate entries in order to take toxicity in water into account was adopted (see annex I).

**B. Transitional measures**

Documents: ECE/TRANS/WP.15/AC.2/2009/28 (Report of the informal working group on transitional measures)  
ECE/TRANS/WP.15/AC.2/2009/19 (Belgium)

Informal documents: INF.2 (Belgium)  
INF.11 (EBU)

16. The Safety Committee adopted revised subsection 1.6.7.2 (general transitional measures) as proposed by the informal working group, with some amendments (see annex I).

17. The Belgian proposals to extend the transitional periods for application of 9.1.0.17.3 (Entrances and openings in the protected area) and 9.1.0.40.1 (Fire extinguishers, two pumps, etc.) were put to the vote and not adopted.

18. The Belgian proposal (ECE/TRANS/WP.15/AC.2/2009/19) to delete the first entry for 9.3.3.8.1 in table 1.6.7.2.2.2 and reinstate it in table 1.6.7.3 was adopted (see annex I). The proposal to delete the entry for 9.3.x.20.1 was also adopted.

19. The transitional measures relating to paragraph 9.3.1.11.2 (a) (Arrangement of cargo tanks; distance between cargo tanks and side walls; height of saddles) were put in square brackets. Among other things, it would be necessary to check how closely type G vessels whose keels had been laid before 1 January 1977 conformed to the conditions stipulated. The Safety Committee asked IACS to provide information on this subject.

20. The Committee noted that the transitional measure for application of 9.3.1.11.2 (a) (Distance between suction wells and floor plates) ought to have appeared in the 2009 version of ADN, but did not.

21. During the discussion on the transitional measure for 9.3.1.11.2 (d) and 9.3.2.11.2 (d) (Cargo tank fastenings), the representative of France pointed out that the Regulations annexed to ADN did not prohibit fastenings in the space between the hulls in type N double-hulled vessels. He considered that such a prohibition should be established, with appropriate transitional measures and offered to submit a proposal to that effect.

22. The Committee noted that paragraph 9.3.3.11.4 of the Regulations did not stipulate a distance of piping in relation to the bottom, and decided to amend it as proposed by Switzerland in informal document INF.7.

23. The Committee, acting on a proposal made by EBU in informal document INF.11, adopted an additional transitional measure for application of 9.3.3.11.4 to shut-off devices on unloading pipes in the cargo tanks from which they come.

24. The deletion of the transitional measure relating to 9.3.2.14.2 (intact stability of type C vessels) was put in square brackets while it was ascertained whether such a measure in relation to type C vessels was acceptable.

25. With regard to the transitional measure concerning 9.3.2.25.2 (i) ("Pipes for loading and unloading, and vapour pipes, shall not have flexible connections fitted with sliding seals"), the Safety Committee first decided to defer the date of implementation to the renewal of the certificate of approval after 31 December 2034. The representative of the Netherlands then asked to revert to the proposal by the informal working group to delete that transitional provision in the light of the serious accidents linked to the use of such flexible connections fitted with sliding seals. After a further discussion, the Safety Committee agreed to reduce the transitional period to 31 December 2018; in other words sliding seals will not be allowed from 1 January 2019.

26. The representative of the Netherlands explained that the serious accidents in question had involved the use of flexible connections fitted with sliding seals for the loading and unloading of petroleum crude oil, and she therefore wished to see such devices prohibited for vessels of type N in 9.3.3.25.2 (h). It was pointed out that, for vessels of type N, the prohibition in question covered only corrosive substances and that she would therefore have to prepare, if she so desired, a formal proposal for the amendment of 9.3.3.25.2 (h).

27. The representative of Germany said that following the revision of the general transitional provisions in 1.6.7.2, the transitional provisions applicable to specific inland waterways in 1.6.7.3 should also be reviewed. He suggested that the Working Party should meet again for that purpose. In that connection, a member of the secretariat recalled that the January 2010 session would be the last session at which amendments could be adopted for the 2011 version of ADN and that the deadline for the submission of documents was 30 October 2009.

### **C. Other amendment proposals**

#### **1. Definitions of the terms "watertight" and "weathertight"**

Document: ECE/TRAN/WP.15/AC.2/2009/7 (Austria)

28. The Safety Committee noted that the terms "watertight" and "weathertight" used in Part 9 of the Regulations annexed to ADN were not defined. Most delegations were in favour of employing the definitions used in inland navigation, particularly those contained in the Rhine Inspection Rules and in Directive 2006/87/EC. However, definitions also existed in the Recommendations on Harmonized Europe-Wide Technical Requirements for Inland Navigation Vessels (Resolution No. 61 of the ECE Working Party on Inland Water Transport), and efforts were being made to harmonize those texts. Furthermore, the definitions in question did not correspond to the definitions used in maritime navigation for terms employed in the same context. There were also other terms, such as "*étanche aux pulvérisations d'eau*" and "*étanche aux embruns*" in French and "sprayproof" in English, that were used in similar or different (loading of packages) contexts.



29. It was thus agreed to revert to the question at the next session after the terms employed in the ADN and the various definitions had been studied and the discussions concerning Resolution 61 had been completed.

## **2. Corrections to models for certificates**

Document: ECE/TRANS/WP.15/AC.2/2009/9 (Austria)

30. The Safety Committee noted that an amendment to the models for certificates in 8.6.1.3 and 8.6.1.4 concerning the information relating to sampling in item 8 of the certificates, which had been adopted at the eleventh session (see ECE/TRANS/WP.15/AC.2/23, annex), had not been included in the consolidated list of amendments contained in document ECE/TRANS/WP.15/AC.2/26 and that there was thus an error in the models for certificates in ADN 2009.

31. Accordingly, the Safety Committee adopted a correction to the two models for certificates (see annex II), and the secretariat was requested to take the necessary steps to ensure that the correction became official as quickly as possible.

## **3. Density**

Document: ECE/TRANS/WP.15/AC.2/2009/10 (Austria)

32. The Safety Committee adopted the proposals regarding the use and definition of the terms related to density (see annex I).

33. The German delegation might, if it deemed it necessary, revert to the issue of the use of some of the terms, notably "relative density", in the Sub-Committee of Experts on the Transport of Dangerous Goods.

## **4. Particulars in the transport document**

Document: ECE/TRANS/WP.15/AC.2/2009/11 (Austria)

34. The Safety Committee adopted the amendments proposed to the examples in 5.4.1.1.2 of particulars to be included in the transport document for carriage in tank vessels (see annex I).

## **5. Inerting or blanketing of the cargo**

Document: ECE/TRANS/WP.15/AC.2/2009/18 (Austria)

35. The various proposals made by Austria concerning inerting or blanketing of the cargo were adopted with some changes (see annex I).

36. In response to a question raised by the representative of France, the representative of Germany would check that the English and French terminology related to flame arresters corresponded to that used in the German, taking into account in particular standard EN 12874: 2001.

## **6. Substances hazardous for the aquatic environment**

Document: ECE/TRANS/WP.15/AC.2/2009/20 (Secretariat)

37. The proposal to bring the provisions of Chapter 2.4 into line with the third revised edition of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) was adopted with some minor changes (see annex I).

38. Similar proposals having been submitted to the RID/ADR/ADN Joint Meeting at its September 2009 session, any amendments made by the Joint Meeting would have to be taken into account by the Safety Committee at its next session.

## **7. Pressure of the vapour phase**

Document: ECE/TRANS/WP.15/AC.2/2009/29 (Austria)

39. The proposal to amend 9.3.3.21.1 was put to the vote and was rejected. The Safety Committee interpreted 9.3.3.21.1 to mean that all cargo tanks must be equipped with an instrument for measuring the pressure of the vapour phase, even if they were connected to the same vapour pipe and were not insulated from one another by means of valves.

40. Given this interpretation, an alternative proposal by Austria for transitional measures for vessels currently in service and not thus equipped was also rejected.

## **8. Vessels in a convoy or side-by-side formation that includes a tank vessel**

Document: ECE/TRANS/WP.15/AC.2/2009/30 (Austria)

Informal document: INF.5 (Austria)

41. The Safety Committee did not consider it necessary to amend the current language. It did, however, confirm the interpretation of 7.2.2.19, namely, that any vessel in a convoy or side-by-side formation that included a tank vessel must be in possession of an ADN certificate, as stated in 7.2.2.19.1 and notwithstanding the provisions of 7.2.2.19.3 and the related transitional measures.

## **9. Miscellaneous corrections**

Document: ECE/TRANS/WP.15/AC.2/2009/31 (Austria)

42. The Safety Committee took note of the various errors identified by Austria and approved the corrections proposed (see annex II).

## **10. Pump-room below deck**

Document: ECE/TRANS/WP.15/AC.2/2009/33 (Germany)

43. The proposals to amend the criteria in Table C of Chapter 3.2 for deciding whether a pump-room was permitted below deck, as well as the consequential amendments to Table C and the related transitional periods, were adopted (see annex I).

## **11. Miscellaneous proposals**

Document: ECE/TRANS/WP.15/AC.2/2009/39 (Secretariat)

44. The proposal to insert identification numbers 9005 and 9006 in 2.2.9.3 was adopted (see annex I).

45. The other proposals, concerning identification numbers 9001, 9002 and 9003 (subsections 2.2.3.3, 2.2.9.3 and Table A under 3.2.1), were favourably received, but a final decision would not be taken until the next session, as CEFIC should verify whether the current names, which included mathematical symbols, were appropriate for particulars in a transport document, or whether they should be replaced by more traditional descriptive language.

46. Regarding item 4 in the document, it was agreed that the word "dangerous" should be used, rather than "toxic", and that the French text of the Rhine Inspection Rules would have to be revised accordingly (see annex I).

47. In 9.3.2.11.4 and 9.3.3.11.4, the word "*Durchführungen*" should be rendered in English as "penetrations" and in Russian as "*Бырезы*" (see annex II).

## **12. Responsibility for providing shipping papers**

Document: ECE/TRANS/WP.15/AC.2/2009/41 (EBU)

48. The Safety Committee took note of the difficulties caused, at least for tank vessels, by the current stipulation in 1.4.2.1.1 (b) that the consignor should furnish the carrier with information and data on the substance handed over for carriage and, if necessary, the required transport documents and accompanying documents. In practice, consignors of dangerous goods for carriage in tank vessels did not provide such information and pressured carriers to draw up the documents themselves. EBU proposed that those obligations should be transferred to the filler, who, in the case of navigation in tank vessels, was actually familiar with the properties of the products transported, as well as with the requirements of ADN.

49. The EBU was requested to consult such organizations as CEFIC and EUROPIA in order to find a solution to the problem.

## **VI. CATALOGUE OF QUESTIONS** (agenda item 5)

Documents: ECE/TRANS/WP.15/AC.2/2009/12-17, 21-26, 34-38 and 40 (CCNR)

Informal document: INF.8 (CCNR)

50. The Safety Committee welcomed the progress made in this area. A complete catalogue of questions and matrixes for their use were available in French and German, a good part of the catalogue was already available in English and Russian and it was anticipated that the documents not available in those languages would be ready in time for the next session.

51. The Safety Committee noted that the catalogue of questions was based on the 2009 version of ADN. The ECE secretariat was requested to post the catalogue on its website, although the catalogue had yet to be formally approved by the Administrative Committee.

52. It was noted that the questions were identified by an alphanumerical code, but that the letters used varied depending on the language version. Subsequently, it would be necessary to establish a single coding system, irrespective of the language used.

53. It was also noted that the catalogue would have to be updated regularly to take account of developments in the Regulations and that any amendments or new questions would have to be finalized and adopted, at the latest, at the January 2011 session of the Administrative Committee for the 2011 version of ADN.

54. The Safety Committee confirmed that the catalogue of multiple-choice questions that was posted on the ECE website would contain the answers to the questions.

55. The informal group on the catalogue of questions would meet again in Strasbourg on 9 and 10 November 2009 to prepare the case studies. While the case studies would also be made available, the answers would not be made public.

56. If necessary, the informal group would prepare a list of amendments to be made to the multiple-choice questions.

## **VII. MATTERS RELATING TO THE RECOGNITION OF CLASSIFICATION SOCIETIES** (agenda item 6)

57. The Safety Committee took note of the recognition of classification societies by various Contracting Parties since the previous session (Austria: Russian Maritime Register of Shipping; France: Bureau Veritas; Hungary: Russian Maritime Register of Shipping, Russian River Register; Netherlands: Bureau Veritas, Germanischer Lloyd, Lloyd's Register of Shipping).

## **VIII. SPECIAL AUTHORIZATIONS, DEROGATIONS AND EQUIVALENTS** (agenda item 7)

### **A. Special authorizations**

Informal documents: INF.4 (Netherlands, for Chemgas Shipping)  
INF.9 (Netherlands, for Shell)

58. The Safety Committee noted that special authorizations had been prepared by the Netherlands in the context of CCNR procedures for navigation on the Rhine and the procedures in subsection 1.5.2.2 of the Regulations annexed to ADN.

59. It was noted that some clarifications seemed necessary where ADN was concerned. The authorizations in question had been prepared in accordance with the second sentence of 1.5.2.2, but they could be delivered only when the competent authorities of the other countries concerned had agreed to it, in keeping with the third sentence of 1.5.2.2, which was not yet the case. If an agreement could not be reached with the other countries concerned, the case or cases would have to be submitted to the Administrative Committee, in accordance with 1.5.2.2.3.

60. In the interest of transparency, the secretariat should be informed of any requests for special authorizations, any special authorizations granted (including an indication of the dates of validity and the countries concerned) and any requests that were rejected so that the Administrative Committee could be informed, in accordance with 1.5.2.2.2.

61. The secretariat was requested to prepare for the next session a document containing proposals for practical modalities for communicating information concerning requests for special authorizations and the issuance of such authorizations and for the conclusion of bilateral and multilateral agreements.

62. In the meantime, the Netherlands would continue the procedure for the two special authorizations which it was currently dealing with and would seek to conform more strictly to sub-section 1.5.2.2 in the light of the comments made.

63. The representative of Switzerland recalled that the purpose of such special authorizations was to allow the transport by tank vessel in all States parties to ADN of substances that were not covered by Table C of chapter 3.2 and were thus not authorized for transport by tank vessel. Accordingly, such special authorizations should be followed up with proposals for new headings to be included in Table C.

### **B. Equivalents**

Informal document: INF.6 (CCNR)

64. The Safety Committee took note of the list of vessels for which the CCNR had issued a recommendation of recognition of equivalence. It recommended that the Administrative Committee take up this list on its own account, with the exception of vessels whose name was unknown and the last recommendation relating to the eye bath which should rather be dealt with in an amendment proposal to paragraphs 9.3.X.60.

**IX. PROGRAMME OF WORK AND CALENDAR OF MEETINGS** (agenda item 8)

65. The Safety Committee noted that the sessions for 2010 are scheduled for 25 to 29 January and 23 to 27 August.

**X. ELECTION OF OFFICERS FOR 2010** (agenda item 9)

66. The election of officers was postponed until the next session.

**XI. ANY OTHER BUSINESS** (agenda item 10)

**A. Study of the European Commission on administrative and regulatory barriers in the field of inland navigation**

Document: ECE/TRANS/WP.15/AC.2/2009/8 (Germany)

Informal document: INF.3 (Germany)

67. The Safety Committee noted that this study had been carried out in the framework of the policy of promoting transport by inland navigation, in order to identify the obstacles to improving the competitiveness and efficiency of this mode of transport. As such it did not focus specifically on the transport of dangerous goods.

68. The Safety Committee recalled that harmonization of the conditions of transport is one of the best means of avoiding the technical regulatory barriers to international transport, and that adherence to the ADN by the largest possible number of countries would greatly facilitate the international transport of dangerous goods by inland waterways.

**B. Conformity of certificates**

Informal document: INF.10 and Add.1 (Austria)

69. The representative of Austria brought to the attention of the Committee copies of a certificate of approval of a vessel and of special knowledge of the ADN issued by a Contracting Party to ADN, obtained during controls, but which did not seem to conform to the provisions of ADN.

70. For the certificate of special knowledge of the ADN, the Safety Committee considered that the certificate was not entirely in conformity with ADN since it twice made reference to 8.2.1.2 when it should have referred to 8.2.1.3 (dry cargo vessels), 8.2.1.3 (tank vessels), 8.2.1.5 and 8.2.1.7 with the unnecessary references deleted (see model 8.6.2).

71. For the certificate of origin of the vessel, the Safety Committee considered that the certificate was in conformity with the ADN regarding content but that it should also conform to the form of the model foreseen in 8.6.1.1, it being understood that the information could appear in more than one language but that, as shown in the model, items 1 to 12 had to appear on the first page in the order and layout shown.

**C. Instructions in writing**

Informal document: INF.12 (Secretariat)

72. The Safety Committee noted that CEFIC had proposed modifications to the ADR instructions in writing (section 5.4.3) in document ECE/TRANS/WP.15/2009/17 and that following the results of discussions, a similar proposal might be submitted for ADN.

**D. Miscellaneous amendment proposals and corrections**

Informal document: INF.7 (Switzerland)

73. The Safety Committee made a preliminary examination of the various proposals of Switzerland and invited the Swiss representative to submit an official proposal for the next session taking account of the comments made.

**E. Request for consultative status**

Informal document: INF.5 (fourteenth session) (International Committee for the Prevention of Work Accidents in Inland Navigation (CIPA))

74. The request from CIPA for consultative status was granted.

**XII. ADOPTION OF THE REPORT** (agenda item 11)

75. The Safety Committee adopted the report of its fifteenth session and its annexes on the basis of a draft prepared by the secretariat.

**Annex I**

Draft amendments to the Regulations annexed to ADN adopted by the Safety Committee  
for entry into force on 1 January 2011  
(see ECE/TRANS/WP.15/AC.2/32/Add.1)



## Annex II

### Corrections to the Regulations annexed to ADN

1. 1.6.7.2.1.1, table of transitional provisions for dry cargo vessels, entry 9.1.0.17.3, third column  
For accommodation and the wheelhouse read engine rooms and service spaces.
  2. 1.6.7.2.2.2, table of transitional provisions for tank vessels
    - Entry 9.3.1.41.2/9.3.2.41.3/9.3.3.41.2  
For 9.3.2.41.3 read 9.3.2.41.2
    - First entry 9.3.3.15  
For 9.3.3.15 read 9.3.1.15
    - Entry 9.3.1.25.2 (i)/9.3.2.25.2 (j)/9.3.3.25.2 (h)  
Delete
  3. 8.6.1.3 Model for a certificate of approval for tank vessels and 8.6.1.4 Model for a provisional certificate of approval for tank vessels, page 1, item 8  
For  
closed.....yes/no<sup>1 2</sup>  
partly closed.....yes/no<sup>1 2</sup>  
read  
connection for a sampling device.....yes/no<sup>1 2</sup>
  4. 8.6.1.3 Model for a certificate of approval for tank vessels and 8.6.1.4 Model for a provisional certificate of approval for tank vessels, page 3  
For  
partly closed sampling device  
sampling opening  
read  
connection for a sampling device
  5. 9.1.0.12.1, first sentence  
Substitute for existing text. It must be possible to ventilate each hold by means of two mutually independent extraction ventilators having a capacity of not less than five changes of air per hour based on the volume of the empty hold.
  6. 9.3.2.11.4/9.3.3.11.4  
For passages read penetrations
-