

## 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)

Sixteenth Meeting

Geneva, 25 - 29 January 2010

Item 4 (b) of the provisional agenda

## PROPOSALS FOR AMENDMENTS TO THE REGULATIONS ANNEXED TO ADN

### Other amendment proposals

#### 7.2.4.40 Fire extinguishing arrangements

Transmitted by the European Barge Union (EBU)

### Introduction

The ADN has various regulations regarding the fire extinguishing arrangements on board inland waterway vessels. Specifically for inland tankers the article 7.2.4.40 makes clear that fire extinguishing arrangements need to be kept ready for operation in the cargo area during loading and unloading.

#### 9.3.x.40 Fire-extinguishing arrangements

9.3.x.40.1 This system shall comply with the following requirements:

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- It shall be provided with a water main fitted with at least three hydrants in the cargo area above deck. Three suitable and sufficiently long hoses with spray nozzles having a diameter of not less than 12 mm shall be provided. It shall be possible to reach any point of the deck in the cargo area simultaneously with at least two jets of water which do not emanate from the same hydrant

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### Background

An incident investigation in the Netherlands in 2007 resulted in the interpretation of the Dutch regulatory agencies to actively check article 7.2.4.40

#### 7.2.4.40 Fire-extinguishing arrangements

During loading and unloading, the fire extinguishing systems, the hoses and spray nozzles shall be kept ready for operation in the cargo area on deck.

Let us make clear that the EBU believes that safety prevails above everything. However the investments in newly developed techniques like the mini monitor shown below and that increase the safety level regarding fire fighting operations during loading and unloading are being frustrated by the wording of existing requirements formulated in 9.3.1.40.1 indicating that sufficient long hoses need to be present. No investments are being made into such a technique when the rolling out of fire hoses is mandatory during loading and unloading. Since the rolling out of the fire hoses and fitting the spray nozzles appropriately is time consuming one often leaves these hoses on deck. During loading and unloading the hoses form a friction with applicable occupational safety and health regulations since one can easily trip over such hoses.



## Proposal

### 9.3.x.40 Fire-extinguishing arrangements

9.3.x.40.1 This system shall comply with the following requirements

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#### Option 1 -

- It shall be provided with a water main fitted with at least three hydrants in the cargo area above deck. Three suitable and sufficiently long hoses with spray nozzles having a diameter of not less than 12 mm shall be provided. It shall be possible to reach any point of the deck in the cargo area simultaneously with at least two jets of water which do not emanate from the same hydrant. The hoses may be replaced by an arrangement offering an equivalent fire fighting safety level upon approval accepted solely on the basis of recommendations by the Administrative Committee.

Option 2 - .....on the basis of recommendations by the competent national authority.

### **Justification**

Since the rolling out of the fire hoses and fitting the spray nozzles appropriately is time consuming one often leaves these hoses on deck. Further the hazards associated with an empty rolled out hose lie in the fact that folds (twists) can arise. It leads to dangerous situations when pressure is put on a hose with these folds (twists). Further, during loading and unloading the rolled out hoses form a friction with applicable occupational safety and health regulations since one can easily trip over such hoses. Further the hoses are more vulnerable in the hazard zone increasing the chance of damage in the event of an emergency which could lead to not being able to use the hose at all. By having the Administrative Committee agree to what alternate systems could replace the hoses this would clear the way for new safer techniques. The acceptance process could be similar to the process described in 9.3.2.40.2.14.

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