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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)****Thirty-third session**

Geneva, 27–31 August 2018

Item 4 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:  
other proposals****Proposal for editorial improvement of the legibility and usability of the ADN: use of the word “accumulator” in Chapter 9****Transmitted by the European Barge Union (EBU) and the European Skippers Organisation (ESO)\*\***

<b>Related documents:</b>	ECE/TRANS/WP.15/AC.2/66 Informal document INF.20 of the thirty-second session (subsection E)
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**Introduction**

1. During the EBU/ESO members' dangerous goods meetings and from participating ADN-trainers that have joined the Informal Working Group on the Training of Experts (IAG Sachkundigenausbildung), EBU/ESO received some improvement proposals mainly editorial, regarding the legibility and usability of the ADN as clarification in general and for the barge crew as specific practical users of the ADN; the ADN-experts on board of barges.

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\* Distributed in German by the Central Commission for the Navigation of the Rhine in document CCNR-ZKR/ADN/WP.15/AC.2/2018/46.

\*\* In accordance with the programme of work of the Inland Transport Committee for 2018-2019 (ECE/TRANS/2018/21/Add.1, cluster 9.3).

2. During the thirty-second session of the ADN Safety Committee, this proposal was presented on behalf of EBU and ESO. The Safety Committee invited the representatives of EBU and ESO to take account of the comments made and submit a revised proposal in an official document for the thirty-third session. The proposal in this document takes account of that request.

3. EBU/ESO invites the Safety Committee to consider an adaption of the ADN concerning the use of the word “Accumulator” in Chapter 9, which leads to confusion and misunderstanding on board.

### **Proposal: use of the word “Battery”**

4. Issue: the word “Accumulator” is not in line with practice on board. In Chapter 9 “accumulators” are mentioned while “batteries” to start engines f.e. are meant and this wording is used on board.

5. Barge crew do not recognize what is meant by “Accumulator”, which can have more meanings than the batteries that are meant in 9.1.0.52.4 and 9.3.x.52.2 of ADN.

6. Clarification proposal:

Change “Accumulator” by “Battery” in Chapter 9 of ADN (9.1.0.52.4 and 9.3.x.52.2) and 1.7.2.2.2 (regarding 9.3.3.52.2)

It is noted that in Tables A and B “Accumulators” as cargo are mentioned and compressed gas accumulators are mentioned for example in remark 240, 363, 385 of the special provisions of Table A, Chapter 3.3.

7. This proposal applies to the articles mentioned above, but also applies to the questions 110 02.0-16 and 110 02.0-22 of the Catalogue of Questions. It is suggested to ask the informal working group of experts to adapt the Catalogue, if the ADN Safety Committee agrees to improve the wording as mentioned above.

### **Safety impact**

8. Basically, in this proposal there is no change of the purpose of these paragraphs. Positive expectation is that this paragraph will be understood better by the people on board which will result into a positive safety impact regarding the use of language which is in line with the practice on board.

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