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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: tank container versus container****Transmitted by the European Barge Union (EBU) and the European Skippers Organisation (ESO)****

Related documents:	ECE/TRANS/WP.15/AC.2/66 Informal document INF.20 of the thirty-second session (subsection C)
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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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** 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 amendment to ADN to avoid confusing the role of a tank container with a container.

Proposal: amendments to 7.1.0.5.0.2 and 7.1.6.12 of ADN

4. Issue: It was notified that during the training of experts, an issue arose concerning tank containers in the context of 7.1.5.0.2 “Marking” and 7.1.6.12 “Ventilation”. The way the texts are drafted might suggest that a tank container is a type of container, which is not.

5. The paragraph regarding exemption of the blue cone marking and ventilation obligation in “VE02” is therefore, not totally clear and mistaken by barge crew and even authorities.

6. In the definition of “Container” in Chapter 1.2 there is only a footnote, which states that a tank container is excluded from the scope of the definition of “container”.

7. It would be helpful to add a note in 7.1.0.5.0.2 and 7.1.6.12 to clarify the paragraphs and avoid unnecessary misunderstanding.

8. In some cases, blue cones are not used although they are obligatory during the carriage of, for example, one single tank container with 20 tons of a substance of class 3, PG II. In this case the circumstances described in 7.1.5.0.2 are not applicable, which is not always clear.

9. Regarding 7.1.6.12: also in this context of ventilation a tank container is not a container. But during the carriage of tank container, when it is suspected that the holds are not free of gases, the holds shall be ventilated (not only during carriage of containers, but also tank containers).

10. Clarification proposal: add a new sentence at the end of 7.1.5.0.2 (new text in bold):

“7.1.5.0.2 Vessels carrying the dangerous goods listed in Table A of Chapter 3.2 in packages placed exclusively in containers shall display the number of blue cones or blue lights indicated in column (12) of Table A of Chapter 3.2 where:

– three blue cones or three blue lights are required, or

– two blue cones or two blue lights are required, when a substance of Class 2 is involved or packing group I is indicated in column (4) of Table A of Chapter 3.2 and the total gross mass of these dangerous goods exceeds 30,000 kg, or

– one blue cone or one blue light is required, when a substance of Class 2 is involved or packing group I is indicated in column (4) of Table A of Chapter 3.2 and the total gross mass of these dangerous goods exceeds 130,000 kg.

The provisions of this paragraph do not apply for carriage of tank containers.”

Insert “or in tank container” in 7.1.6.12 as shown below (new text in bold).

“7.1.6.12 Ventilation

The following additional requirements shall be met when they are indicated in column (10) of Table A of Chapter 3.2:

....

VE02: Holds containing these substances shall be ventilated with the ventilators operating at full power, when after measurement it has been established that the holds are not free from gases from the cargo. The measurement shall be carried out immediately after loading. The measurement shall be repeated after one hour for monitoring purposes. The results of the measurement shall be recorded in writing.

Alternatively, on vessels only containing these substances in containers ***or in tank containers*** in open holds, the holds containing such containers may be ventilated with the ventilation operating at full power only when it is suspected that the holds are not free of gas.

Prior to unloading, the unloader shall be informed about this suspicion.”

Safety impact

11. Basically, in this proposal, there is no change to the purpose of these paragraphs. Positive expectation is that these paragraphs will be understood better by the people on board which will result into a positive safety impact regarding blue cones and ventilation on board of dry cargo barges during the carriage of tank containers.
