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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)

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Item 4 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
Other proposals**

Subsection 1.1.3.6 of ADN: Exemptions related to quantities carried on board vessels

Transmitted by the Government of Germany*, **

Summary

Executive summary:	The procedure for calculating the gross quantity of dangerous goods carried on board as described in 1.1.3.6.1 (a) is not clear.
Action to be taken:	Amendment to 1.1.3.6.1 (a) of ADN.
Related documents:	None

Introduction

1. Section 1.1.3 of ADN contains several types of exemption: in addition to the exemption to certain provisions of ADN depending on the quantities carried on board the vessel concerned (1.1.3.6), there are also exemptions related to the nature of the transport operation (1.1.3.1), to special provisions and limited or exempted quantities (1.1.3.4) and to the carriage of electric energy storage and production systems (1.1.3.7).

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2. These various rules on exemptions may be applied simultaneously for various dangerous goods carried.

3. Against that background, the German delegation considers that the procedure for calculating the gross quantities referred to in 1.1.3.6.1 (a) of ADN, which is relevant for the application of an exemption on the basis of the quantities carried on board vessels (3,000 kg or 300 kg), is not clear.

Request

4. In subsection 1.1.3.6 of ADN, add a new subparagraph, as follows:

“1.1.3.6.3 For the purposes of this subsection, dangerous goods exempted in accordance with 1.1.3.1 (a), (b) and (d) to (f), 1.1.3.2 to 1.1.3.5, 1.1.3.7, 1.1.3.9 and 1.1.3.10 shall not be taken into account.”.

Justification

5. The amendments are necessary so as to be able to determine clearly whether the relevant quantity thresholds for exemption referred to in 1.1.3.6 of ADN have been exceeded.

6. The exemptions mentioned are to be added to 1.1.3.1 (a), (b) and (d) to (f), 1.1.3.2 to 1.1.3.5, 1.1.3.7, 1.1.3.9 and 1.1.3.10, which are the more specific provisions that should always be checked first. The possibility of exemption referred to in subsection 1.1.3.6 of ADN should only be used if the above-mentioned exemptions do not apply.

7. The wording has been taken from 1.1.3.6.5 of ADR/RID. 1.1.3.1 (c) is not included as the exemption in that provision is already limited to the maximum quantities referred to in 1.1.3.6 of ADN.

Safety

8. The amendment does not affect safety of carriage. The exemptions mentioned in the comment for inclusion in ADN are harmonized with ADR/RID. In themselves, the exemptions certainly do not entail any risk in terms of safety, even where other dangerous goods are also carried under 1.1.3.6 of ADN.

Implementation

9. No modifications are required in terms of naval construction or logistics that are likely to represent a constraint for the businesses concerned. Carriage will be facilitated. A provision that was unclear is clarified so as to avoid any uncertainty in its interpretation, and the existing scope of the exemptions, which was based on differing interpretations, may be expanded.