
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-fifth session**

Geneva, 26-30 August 2019

Item 5 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN: other proposals

22 January 2020

English

Comments on proposals in document 2020/13**Note by the secretariat**

The secretariat would like to thank EBU and ESO for the proposals in 2020/13 and is in support of the overall objective of making the content of 7.1.4.1 clearer and more transparent to the users. However, in order to align the content of the new proposals with the current 7.1.4.1, the following points may be considered:

- It is not clear that the maximum quantity of dangerous goods of 1,100,000 kg permitted per unit of a pushed convoy or side-by-side formation applies to all cases except for double-hull vessels meeting the additional construction rules in 9.1.0.88 to 9.1.0.95 or 9.2.0.88 to 9.2.0.95 **and** transporting dangerous goods of Classes 2, 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 7, 8 and 9, for which a label of Model No. 1 **is not** required in column (5) of Table A of Chapter 3.2.
 - The exception made in the current text for dangerous goods of classes 2, 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 7, 8 and 9 carried in double-hull vessels meeting the additional construction rules in 9.1.0.88 to 9.1.0.95 or 9.2.0.88 to 9.2.0.95, for which a label of Model No. 1 **is** required in column (5) of Table A of Chapter 3.2 is not properly placed in the new proposal and may lead to problems of implementation.
 - Provisions for the carriage of dangerous goods of Class 1 and mixed loads of substances and articles of different divisions of Class 1 in a single vessel are also not properly placed in the new proposal and may lead to problems of implementation.
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