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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Diplomatic Conference for the adoption
of a European Agreement concerning
the International Carriage of Dangerous
Goods by Inland Waterways (ADN)
(Geneva, 22-26 May 2000,
agenda item 8 (a))

**CONSIDERATION OF A DRAFT EUROPEAN AGREEMENT
CONCERNING THE INTERNATIONAL CARRIAGE OF
DANGEROUS GOODS BY INLAND WATERWAYS (ADN)**

Transmitted by the Government of the Russian Federation

In accordance with the decision of the Inland Transport Committee of the Economic Commission for Europe at its sixty-second session, I am transmitting to you the suggestions by the Russian Federation relating to the European regulations for the carriage of dangerous goods by international inland waterways (ADN), which require further consideration at the Diplomatic Conference.

1. The agreement does not, unfortunately, accord special status to vessels of mixed "river-sea" navigation.

On the insistence of countries belonging to the Central Commission for the Navigation of the Rhine (CCNR), vessels of this type are referred to as seagoing vessels in the agreement, since they fall within the ambit of the 1974 SOLAS Convention and MARPOL. The agreement applies only to inland navigation vessels which do not venture into maritime areas. It follows

from this that vessels of mixed “river-sea” navigation, when transporting dangerous goods, come within the scope of the International Maritime Dangerous Goods (IMDG) Code and, when proceeding on to international inland waterways, must carry a certificate of approval, in accordance with the requirements of ADN. This poses additional problems for commercial navigation.

2. The agreement contemplates a complicated procedure for the adoption of amendments, since it provides for the creation of an administrative committee and a safety committee. Virtually all amendments to technical provisions must pass through a double approval procedure, first in the safety committee and then in the administrative committee, which contravenes the Vienna Convention on the Law of Treaties of 23 May 1969.

3. The marginals 10 500 and 210 500, relating to the carriage of light signals on vessels, must be clarified. They must be based on the principle of the mutual recognition of signals. Under the established tradition on European inland waterways, vessels carry blue lights by night and blue cones by day, and Russian vessels - red lights and red flags.

4. The ADN agreement must apply on all inland waterways falling within the European Agreement on Main Inland Waterways of International Importance (AGM).
