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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 amendment proposals

7.2.2.19.3, Requirements for pushed convoys and side-by-side formations

Transmitted by the Government of Austria^{1,2}

1. 7.2.2.19.3 contains a list of paragraphs, the provisions of which have to be complied with by vessels used for propulsion, when a pushed convoy or a side-by-side formation comprises a tank vessel carrying dangerous substances.
2. This list includes paragraphs 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6. These paragraphs do not apply to open type N tank vessels.

¹ Distributed in German by the Central Commission for the Navigation of the Rhine (CCNR) under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2010/2.

² In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (b)).

3. If a pusher pushes a type N open tank vessel or a dry cargo vessel moves a type N open tank vessel in a side-by-side formation, the pusher or the dry cargo vessel has to comply with these paragraphs while the tank vessel itself does not comply with these requirements.

4. The paragraphs mentioned above cannot be deleted from the list in 7.2.2.19.3, because they are necessary to guarantee the safety during the transport of substances, for which anti-explosion protection is required.

5. But it should be possible to use vessels only for the movement of type N open vessels. This possibility would be useful for dry cargo vessels for example, which were originally not intended for use with tank vessels, but are adapted after a change of ownership. Without an exemption from 9.3.3.10.2 it would be necessary to increase the height of the lower edges of door-openings and of coamings to 50 cm, even though this is not required on the type N open tank vessels to be moved in the convoy.

6. If an exemption for pushed convoys and side-by-side formations with type N open vessels is introduced, it would also be necessary to amend point 4 of the certificate of approval with a new line in order to make it clear if a pusher is only allowed to push type N open vessels or all types of tank vessels.

7. As there is a transitional provision until 2044 for pushers in service and most of the new buildings are going to comply with all requirements to be able to move all types of tank vessels, it would also be possible to keep the model of the certificate without any changes and to require an entry under "permitted derogations". But this line of the certificate of approval is normally reserved for permitted derogations in accordance with 1.5.3.2.

8. Therefore one of the following alternatives is proposed as an amendment to the Regulations annexed to ADN:

Alternative 1 (with amendment of the models of the certificates of approval):

Insert a new paragraph 7.2.2.19.4 in part 7:

"7.2.2.19.4 By derogation from 7.2.2.19.3 above, vessels moving only type N open tank vessels do not have to meet the requirements of paragraphs 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6."

Insert a new third line in number 4 of the model of a certificate of approval for dry cargo vessels in 8.6.1.1 and the model of a provisional certificate of approval for dry cargo vessels in 8.6.1.2:

"vessel referred to in 7.2.2.19.4 ¹"

Alternative 2 (without amendment of the models of the certificates of approval):

Add the following sentences to paragraph 7.2.2.19.3 of part 7:

"Vessels moving only type N open tank vessels do not have to meet the requirements of paragraphs 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6. In this case the following entry shall be made in the certificate of approval a provisional certificate of approval under number 5, permitted

derogations: "Derogation from 9.3.3.10.1, 9.3.3.10.2 and 9.3.3.12.6; the vessel may only move tank vessels of type N open."

9. The Government of Austria would prefer the first alternative. The second alternative would produce a certificate of approval, which is more difficult to read in foreign languages and might lead to misunderstandings, because these vessels are also allowed to move vessels of all types without dangerous cargo and dry cargo vessels with dangerous cargo. This issue is clearly described in 7.2.2.19.3 and 7.2.2.19.4, but it is not possible to cover the whole content of the requirements under point 5 of the certificate of approval.
