

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)

Twelfth session
Geneva, 21-25 January 2008
Agenda item 4 (c)

COMMENT ON ECE/TRANS/WP.15/AC.2/2008/5

Submitted by the European Barge Union (EBU)

As a recognized Non-Governmental Organization of the Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN), the European Barge Union would like to comment on document ECE/TRANS/WP.15/AC.2/2008/5. This document was submitted by the expert of Germany and is on the agenda for the twelfth session that is scheduled to assemble later this month. Although we appreciate the justification of the expert of Germany which is to prevent problems concerning the application we believe that the proposed text will open a discussion on what a competent authority will designate as an approved person. The current text as stated in 7.2.4.15.3 is only applicable if additional stripping of the cargo tanks and pipes for loading and unloading is necessary, thus if the vessel itself has no means of performing such additional operations and third party assistance is required. The text as proposed will make it necessary that gas-freeing operations as described in 7.2.3.7.1 will have to be carried out by a person or company approved for that purpose by the competent authority.

Proposal:

7.2.3.7.1 Empty or unloaded cargo tanks having previously contained dangerous substances of Class 2, Class 3, with classification code „T“ in column (3b) of Table C of Chapter 3.2, Class 6.1 or packing group I of Class 8, may only be gas-freed at the locations designated or approved for such purpose by the competent authority.

Gas-freeing may be carried out only by persons who meet the training requirements of 8.2.1, who are under the direct supervision of a person or persons who meet the training requirements of 8.2.1 or persons of companies approved for this purpose by the competent authority. We believe no text amendments would be necessary for 7.2.4.15.3 since the wording „if necessary“ is stated in the current text.

Justification:

To avoid a deviation among ADN competent authorities regarding the specific requirements an approved person needs to comply with. Since the representatives of the European Barge Union are not able to attend the twelfth session of the Joint Meeting of Experts we hope that this letter clearly reflects our position on this particular matter and if necessary will be able to address this proposal during the June session.
