

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 INF.8

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 an informal document that was submitted for the meeting next week. In this document the expert of Germany proposes three different possible options concerning chapter ADN 5.4.3 "Instructions in writing".

Looking at enforcement results in the past one can say that complying with the current emergency response regulation has been a challenge for the inland container shipping industry. A review of recent publicized statistics in international journals indicates the worldwide terminal throughput is to be 441.3 million TEUs for the year 2006 with a projected total of over 741 million in 2012. A recent study of the International Maritime Organization (IMO) indicated that of the world wide 18.676 inspected containers with dangerous goods a large portion (14%) of the violations were found in complying with the documentation requirements. The European Barge Union believes the failure of having the correct emergency response information can be found in the differences among model and state regulations concerning this requirement as well as the increasing amount of hard copy documents. Looking at the global supply chain of container logistics we believe a globally harmonized emergency response procedure would be the best solution however we welcome the submitted text by the expert of Germany.

We would like to endorse option three which suggests a harmonization of emergency response procedures between two major modes of transportation in Europe. Alignment of these procedures will also stimulate the possibility of having this information readily available in a digital format in the future and thus anticipating with the e-freight initiatives that are taking place.

The European Barge Union would like to call upon the distinguished experts of governments to embrace option three of the German informal document and would like to contribute to a further discussion during the thirteenth session of the Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways.
