WP.15/AC.2/14/INF.8

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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)

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Chapter 1.6 Transitional regulations

Submitted by Germany, the Netherlands and Switzerland

Problem

A high technical standard of the vessels is, in addition to a high qualification of the crew, one of the most important preconditions for a safe and environmentally compatible carriage of dangerous goods by ship on European inland waterways. The high transport safety will in future be based on the regulations of the ADN Agreement. The regulations will be periodically adjusted to the latest state of technology.

The application of the new technical regulations for existing ships is connected with differing degrees of cost and effort, depending on the type and year of construction. In case of older ships the costs for adaptation and downtime are often considerable. High costs or constructional difficulties can make an adaptation impossible or only difficult to realise.

When new requirements are introduced it is possible for the Contracting Parties of ADN to grant temporary or permanent transitional regulations for existing vessels. These transitional regulations more and more lead to a difference in the safety standards of the ships.

The reasons given for the transitional regulations are said to be protection of vested rights and economic arguments. But economic disadvantages also arise for shipowners who invest in new vessels and thus, due to the higher technical requirements, have to bear higher costs compared to

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existing ships. This can impair marine engineering innovations and the continuing improvement of a safe and environmentally compatible transport.

In the scope of the work of the Central Commission for the Navigation of the Rhine Germany commissioned a study on the transitional regulations for the general design and equipment requirements for inland waterway vessels. The facilitations regarding the general basic requirements for existing ships were examined as to their relevance for safety and were evaluated as regards design and costs.

On the basis of this study the transitional provisions of the technical regulations for Rhine vessels (Regulations on the Inspection of Rhine Vessels) were selectively tightened and, as a principle, a term of expiration was imposed. The relevant temporary and simplified transitional regulations were also adopted in EU Directive 2006/87/EC.

In accordance with this approach for the basic regulations the nearly 140 transitional regulations of the Regulations for the Carriage of Dangerous Substances on the Rhine (ADNR) were examined, too.

The study was carried out by the institutes TNO (NL) and DST (D) and by the company Transafe (NL).

Overall Objective

The overall objective of the study is to illustrate to what extent the ADNR transitional regulations have an impact on safety, environment and economic parameters. The results of the study are to serve as a basis for proposals on a limitation of the number of transitional regulations and their periods of implementation.

Approach

The study examined the ADNR transitional regulations, situation 2007, for dry-cargo and tank vessels with the following six working steps:

- Presentation of the transitional regulations and background information
- Estimation of the number of vessels applying the transitional regulations
- Safety-related classification
- Economic classification
- Comparison of the safety-related and the economic classification
- Elaboration of a recommended course of action.

Results

The results of the very comprehensive safety-related and of the macro-economic examinations were summarised in three partial reports. It has not yet been possible to finally evaluate the results of the study and the recommendations on the transitional regulations which were examined individually (Annex 1).

But it can be seen now already that the transitional regulations can be phased and generally tightened. This applies mainly to dry-cargo vessels. An important aspect for the detailed examination of the results of the study will be the age of the fleet. About 45 % of the cargo vessels and approximately 62 % of the tank vessels are older than 38 years (Annex 2). Most of them are single-hull ships.

New regulations for the carriage on European inland waterways of substances pollutant to the aquatic environment stipulate that in future a number of substances will have to be transported in double-hull vessels. These developments and trends in the individual transport markets will have to be included in the further clarifications.

Proposals for future action

- First presentation and discussion of the results of the study on the occasion of the Meeting of the ADN Safety Committee at UNECE in Geneva from 26 to 30 January 2009.
- Final evaluation of the results of the study and elaboration of a summary consideration of the individual recommendations for the transitional regulations.
- Elaboration of a proposal for a reduction and time limitation of the transitional regulations on the basis of the study results.
- Discussion of the proposal to revise the transitional regulations at the ADN Safety Committee Meeting at UNECE in Geneva in August 2009.
- Presentation of a coordinated proposal of the ADN Safety Committee to the ADN Administrative Committee.

Annex I

Inventory of the recommendations for action of Transafe and DST on the individual transitional regulations for drycargo and tank vessels which carry dangerous goods on European inland waterways.

Table 3.3: Overview of transitional rules for dry bulk ships and cost impact.

1	2	3	4	5	6	7	8	9
				Vessels that		Total cost		
			Total	are using		in € of	9/6	
	ADNR		number	transitional	Cost	abolishing	ships	Proposed
Number	Number	Measure (in German)	of vessels	rules	€/Vessel	rule	affected	Timing
1	9.1.0.12.1	Lüftung Laderäume	1418	730	25.000	18250000	51,5%	2015
2	9.1.0.12.3	Lüftung Betriebsräume	1254	234	7.500	1755000	18,7%	2015
3	9.1.0.12.3	Lüftung Betriebsräume	1229	231	5.000	1155000	18,8%	direct
4	9.1.0.17.2	Zu den Laderäumen gerichtete Öffnungen müssen gasdicht sein	1254	160	75.000	12000000	12,8%	2015
5	9.1.0.31.2	Ansaugöffnungen	1254	71	45.000	3195000	5,7%	2015
6	9.1.0.32.2	Lüftungsrohre	1253	135	3.000	405000	10,8%	direct
7	9.1.0.34.1	Position der Abgasrohre	1253	168	40.000	6720000	13,4%	2015
8	9.1.0.35	Lenzpumpen im geschützten Bereich	1210	749	40.000	29960000	61,9%	2015
9	9.1.0.40.1	Feuerlöscheinrichtung,	1254	371	7.500	2782500	29,6%	direct
10	9.1.0.40.2	Fest eingebaute Feuerlöscheinrichtungen im Maschinenraum	1254	641	60.000	38460000	51,1%	2015
11	9.1.0.41	Feuer und offenes Licht	1229	268	7.500	2010000	21,8%	direct
12	9.2.0.31.2	Ansaugöffnungen Motoren (for sea/river vessels)					0,0%	2015
13	9.2.0.34.1	Position der Abgasrohre (for sea/river vessels)					0,0%	2015
14	9.2.0.41	Feuer und offenes Licht (for sea/river vessels)					0.0%	direct

Table 3.8: Overview of transitional rules for tanker vessels and cost impact

N	ADNR		Total number of	Vessels that are using transitional	Cost €/-	Total cost of abo- lishing	% ships	Proposed
Number	Number	Measure (in German) Elektrische Einrichtungen von Tvo "begrenzte	vessels 1242	rules 575	Vessel 60.000	rule	affected	timing
15	1.2.1	Explosionsqefahr"	1242	575	00.000	34500000	46,3%	2018
16	1.2.1	Aufstellungsraum	178		60.000	0	0.0%	2018
17	1.2.1	Flammendurchschlag-	789	498	35.000	17430000	63,1%	2035
18	7.2.2.6	Zulassung Gasspüranlagen	1045	327	10.000	3270000	31,3%	2015
19	7.2.2.8	Laufende Klasse Typ N	487	411	Siehe Text	0	84,4%	2035
20	7.2.2.19.3	Schiffe, die für die Fortbewegung	255	167	40.000	6680000	65,5%	2018
21	7.2.3.20	Verwendung von	652	652	Siehe Text	0	100,0%	2035
22	7.2.3.20.1	Ballastwasser			Siehe Text	0	0,0%	2035
23	7.2.3.20.1	Bedingung Leckstabilitäts-	41	41	Siehe Text	0	100,0%	2035
24	7.2.3.25.1 c)	Verbindung Lade-, Löschleitung mit Rohrleitungen außerhalb des Bereichs des Ladung	37	37	20.000	740000	100,0%	2038
25	7.2.3.31.2	Motorisierte Fahrzeuge nur außerhalb des Bereichs der Ladung	178	178		0	100,0%	2035
26	7.2.3.42.3	Benutzen der Ladungs-heizungsanlage	215	215	30.000	6450000	100,0%	2035
27	7.2.3.51.3	Unter Spannung stehen	999	520	3.000	1560000	52,1%	2015
28	7.2.4.16.15	Laderate beim Beginn des Ladevorgangs	1242	1242	7.500	9315000	100.0%	2015
29	7.2.4.22.1	Öffnen von Öffnungen	411	411	Siehe Text	0	100,0%	
30	8.1.2.3 c)	Lecksicherheitsplan	41	41	7.500	307500	100,0%	2015
31	8.1.2.3 c)	Intaktstabilitätsunterlagen	1242	599	12.000	7188000	48,2%	2015
32	8.1.2.3 i)	Lade- und Löschinstruktion	1201	754	7.500	5655000	62,8%	2018
33	8.1.6.2	Schläuche und Schlauchleitungen entsprechend Norm EN 12115	'		Siehe Text	0		2010
34	9.3.2.0.1 c) 9.3.3.0.1 c)	Gassammelleitungen gegen Korrosion geschützt	1201	501	35.000	17535000	41,7%	2018
35	9.3.1.0.3 d) 9.3.2.0.3 d) 9.3.3.0.3 d)	Materialien in Wohnungen	1242	759	150.000	11385000 0	61,1%	2035
36	9.3.3.8.1	Laufende Klasse			Siehe Text	0	0,0%	2035

	ADNR		Total number of	Vessels that are using transitional	Cost €/-	Total cost of abo- lishing	% ships	Proposed
Number	Number	Measure (in German)	vessels	rules	Vessel	rule	affected	timing
	9.3.1.10.2.	, ,	1242	529	12.000			2015
	9.3.2.10.2,							
37	9.3.3.10.2	Sülle von Türen usw.				6348000	42,6%	
	9.3.1.10.3,		1242	755	12.000			
	9.3.2.10.3,							
38	9.3.3.10.3	Höhe Sülle	41	41	Siehe Text	9060000	60,8%	2015
39	9.3.1.11.1 b)	Verhältnis	958	274	Siehe Text	0	100,0%	2035
40	9.3.3.11.1 d)	Längenbegrenzung Ladetanks	958	13	Siehe Text	0	28,6%	2035
41	9.3.1.11.2 a)	Aufstellung Ladetanks Abstand längsseitig zwischen dem	41	22		0	31,7%	2035
42	9.3.1.11.2 a)	Pumpensumpf und den Bodenverbänden	41	22	Siehe Text	0	53,7%	2035
	9.3.1.11.2 b),						22,7.12	
	9.3.2.11.2 b),							
43	9.3.3.11.2.a)	Aufschwimmsicherung	1008	28 73	30.000	840000	2,8%	2035
44	9.3.1.11.2 c)	Inhalt Pumpensumpf	1242		40.000	2920000	5,9%	2035
45	9.3.1.11.2 d)	Stützen zwischen	284	83	90.000	7470000	29,2%	2035
46	9.3.1.11.3 a)	Endschotte	41	17	Siehe Text	0	41,5%	2035
47	9.3.2.11.3 a)	Kofferdammbreite	1201	614	Siehe Text	0	51,1%	2035
48	9.3.3.11.4	Durchführung durch	958	540	Siehe Text	0	56,4%	2035
49	9.3.3.11.4	Absperrschieber	5	5	Siehe Text	0	100,0%	2018
50	9.3.3.11.4	Abstand Leitungen	958	767	60.000	46020000	80,1%	2018
51	9.3.3.11.6 a)	Form des als	958	540		0	56,4%	2018
52	9.3.1.11.7	Anordnung im Bereich	999	669	15.000	10035000	67,0%	2015
53	9.3.3.11.7	Abstände der Ladetanks	92	83	Siehe Text	0	90,2%	2035
54	9.3.1.11.8	Abmessungen von	999	669	15.000	10035000	67,0%	2015
55	9.3.1.11.8	Abstand zwischen den	1242	693	50.000	34650000	55,8%	2035
56	9.3.2.12.1	Lüftungsöffnungen	1201	503	15.000	7545000	41,9%	2015
57	9.3.1.12.2	Lüftung Wallgänge und	999	669	20.000	13380000	67,0%	2035
58	9.3.1.12.3	Höhe Zuluftöffnungen	1242	674	15.000	10110000	54,3%	2015
59	9.3.1.12.6	Abstand Lüftungsöffnung	1242	674	40.000	26960000	54,3%	2035
60	9.3.1.12.6	Fest installierte	1242	731	12.000	8772000	58,9%	2035
61	9.3.3.12.7	Zulassung Flammen-durchschagsicherung	958	600	20.000	12000000	62,6%	2018

Number	ADNR Number	Measure (in German)	Total number of vessels	Vessels that are using transitional rules	Cost €/- Vessel	Total cost of abo- lishing rule	% ships affected	Proposed timing
62	9.3.1.13	Stabilität Allgemein	999	743	15.000	11145000	74,4%	2035
63	9.3.3.13.3	Stabilität Allgemein			Siehe Text	0	0,0%	2035
64	9.3.1.14	Stabilität Intakt			Siehe Text	0	0,0%	2035
65	9.3.1.15	Stabilität im Leckfall			Siehe Text	0	0,0%	2035
66	9.3.3.15	Stabilität im Leckfall			Siehe Text	0	0,0%	2035
67	9.3.1.16.1	Abstand Öffnungen	999	743	Siehe Text	0	74,4%	2035
68	9.3.3.16.1	Verbrennungsmotoren	411	193	Siehe Text	0	47,0%	2035
69	9.3.1.16.2	Anschlag von Türen	411	270	Siehe Text	0	65,7%	2035
70	9.3.1.17.1	Wohnungen und	411	270	Siehe Text	0	65,7%	2035
71	9.3.1.17.2	Anordnung der Zugänge	1242	699	Siehe Text	0	56,3%	2035
72	9.3.3.17.3	Zugänge und Öffnungen	411	216	7.500	1620000	52,6%	2015
73	9.3.1.17.4	Abstand Öffnungen	999	650		0	65,1%	2035
74	9.3.3.17.5	Zulassung Wellendurch-	411	216	10.000	2160000	52,6%	2018
75	9.3.1.17.6	Pumpenraum unter Deck	999	743	Siehe Text	0	74,4%	2035
76	9.3.3.20.2	Füllen Kofferdämme	411	216	35.000	7560000	52,6%	2018
77	9.3.2.20.2	Füllen Kofferdämme	1201	614	35.000	21490000	51,1%	2018
78	9.3.2.20.2	Einlassventil	1201	614	Siehe Text	0	51,1%	2018
79	9.3.3.21.1 b)	Niveauanzeigegerät	487	224	45.000	10080000	46,0%	2035
80	9.3.3.21.1 c)	Niveau-Warngerät			Siehe Text	0	0,0%	direct
81	9.3.1.21.1 d)	Grenzwertgeber			Siehe Text	0	0,0%	direct
82	9.3.2.21.1 e)	Alarmeinrichtung			Siehe Text	0	0,0%	direct
83	9.3.2.21.1 f)	Einrichtung zum Messen			Siehe Text	0	0,0%	direct
84	9.3.3.21.1 g)	Einbau Temperatur-	411	216	30.000	6480000	52,6%	2035
85	9.3.1.21.4	Niveau-Warngerät	1242	559	40.000	22360000	45,0%	2035
86	9.3.1.21.5 a)	Stecker in der Nähe	1242	559	5.000	2795000	45,0%	2015
87	9.3.1.21.5 b)	Einrichtung Abschalten der Bordpumpe			Siehe Text	0	0,0%	direct
88	9.3.3.21.5 b)	Grenzwertgeber			Siehe Text	0	0,0%	direct
89	9.3.2.21.5 c)	Schnellschlusseinrich-tung			Siehe Text		0,0%	direct
90	9.3.1.21.7	Alarme für Unter-, Überdruck	1242	379	30.000	11370000	30,5%	direct
91	9.3.2.21.7	Alarme für Unter-, Überdruck			Siehe Text	0	0,0%	direct
92	9.3.1.21.7	Alarme für die Temperatur	1242	492	30.000	14760000	39,6%	2015

Number	ADNR Number	Measure (in German)	Total number of vessels	Vessels that are using transitional rules	Cost €/- Vessel	Total cost of abo- lishing rule	% ships	Proposed timing
93	9.3.1.22.1 b)	Höhe Ladetanköffnungen	41	28	40.000	1120000	68,3%	direct
94	9.3.3.22.1 b)	Ladetanköffnungen			Siehe Text	0	0,0%	direct
95	9.3.1.22.3	Position des Sicherheits-ventils/bzw	755	304	15.000	4560000	40,3%	2015
96	9.3.1.22.4	Verhütung der Funken-bildung	41	41	40.000	1640000	100,0%	2035
97	9.3.2.22.4 b)	Einstelldruck des Hoch-	714	714	15.000	10710000	100,0%	
98	9.3.2.22.5 a),	Flammendurchschlag-sicherungen	Siehe Text	Siehe Text	Siehe Text	0		2010
99	9.3.2.22.5 a)	Feuerlöscheinrichtung			Siehe Text		0,0%	2010
100	9.3.3.23.2	Prüfdruck der Ladetanks	958	376	Siehe Text	0	39,2%	2038
101	9.3.3.23.3	Prüfdruck der Lade- und Löschleitungen	37	15	20.000	300000	40,5%	2038
102	9.3.2.25.1	Abschalten Ladepumpen	1201	624	10.000	6240000	52,0%	2015
103	9.3.1.25.1	Abstand Pumpen usw.	1242	699	45.000	31455000	56,3%	2035
104	9.3.3.25.2 a)	Lade- und Löschleitungen	37	37	40.000	1480000	100,0%	2038
105	9.3.1.25.2 d)	Position der Lade- und	284	66	60.000	3960000	23,2%	2035
106	9.3.1.25.2 e)	Abstand Landanschlüsse	1242	559	20.000	11180000	45,0%	2015
	9.3.2.25.2 g)	Lade- und Löschleitungen	Keine Angabe	Keine Angabe	Keine Angabe	0		
	9.3.3.25.2 h)	Lade- und Löschleitungen	Keine Angabe	Keine Angabe	Keine Angabe	0		
107	9.3.3.25.8 a)	Ansaugleitung für Ballastzwecke	958	815	20.000	16300000	85,1%	2018
108	9.3.2.25.9	Lade- und Löschrate	1201	754	12.000	9048000	62,8%	2018
109	9.3.3.25.12	gelten nicht für Typ N offen, mit Ausnahme für Typ N	176	120	Siehe Text	0	68,2%	2018
110	9.3.1.27.2	Kühlanlage	2	2	Siehe Text	0	100,0%	2035
111	9.3.2.28	Berieselungsanlage	243	28	8.000	224000	11,5%	2015
112	9.3.2.28	Berieselungsanlage	Siehe Text	Siehe Text	Siehe Text	0		2015
113	9.3.1.31.2	Abstand Ansaugöffnungen	1242	83	Siehe Text	0	6,7%	2035
114	9.3.1.31.4	Oberflächentemperatur Motoren	1242	450	20.000	9000000	36,2%	2015
115	9.3.1.31.5	Temperatur Maschinenraum	1242	699	55.000	38445000	56,3%	2035
116	9.3.1.32.2	Lüftungsrohre 0,50 m uber Deck	1242	399	7.000	2793000	32,1%	2015
117	9.3.3.34.1	Abgasrohre	958	570	40.000	22800000	59,5%	2018
118	9.3.1.35.1	Lenz- und Ballastpumpen	999	650	35.000	22750000	65,1%	2035
119	9.3.3.35.3	Ansaugleitung für Ballastzwecke	958	815	22.000	17930000	85,1%	2018

Annex II

Inventory of the ships which have a registration certificate according to ADNR for the carriage of dangerous goods, summarised according to age classes (estimated values)

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The table below shows the number of tankers and dry vessel goods and their age distribution. In the table on the next page the number of ships per age segment and detailed ship types are presented. Both tables are obtained from the IVR registry and have been elaborated by Transafe. The Registration of IVR is not accurate nor complete, therefore the flag state files were used which were checked thoroughly with information available within Transafe files and other commercial files.

Table 3.1: Amount of tanker and dry bulk vessels that comply to the ADNR certification.

years	dry bulk	%	tankers	%
_	vessels			
till 1955	160	9.8%	107	8.6%
1956-1965	372	22.7%	368	29.6%
1966-1975	204	12.5%	300	24.2%
1976-1985	168	10.3%	76	6.1%
1985-1994	260	15.9%	148	11.9%
1995-1996	22	1.3%	8	0.6%
1997-1998	50	3.1%	20	1.6%
1999-2000	139	8.5%	29	2.3%
2001-2002	87	5.3%	27	2.2%
2003-2004	87	5.3%	97	7.8%
2005-2006	82	5.0%	61	4.9%
from 2007	6	0.4%	1	0.1%
total	1637	100.0%	1242	100.0%
older than 1995	1164	71.1%	999	80.4%

From the table above it can be observed that 71.1% of dry bulk ships and 80.4% of tankers are older than 1995, in this year the ADNR 1995 came into force. All ships build after this year are in principle and at large compliant with the ADNR rules as during the construction the measure could be implemented. It should be mentioned that there could still be a margin of error in the table above. Below we will continue the analysis separately for dry bulk ships and for tankers.