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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) (ADN Safety Committee)****Twenty-first session**

Geneva, 27–31 August 2012

Item 5 (b) of the provisional agenda

**Proposals for amendments to the Regulations annexed to ADN:
Amendments for entry into force on 1 January 2015****UN 1361, CARBON, animal or vegetable origin****Transmitted by the European Barge Union (EBU)****I. Introduction**

1. Every year about 50 million tonnes of coal is transported on European inland waterways. The percentage of coal in total transport by the inland navigation sector is about 15%. The transport of coal is organized in highly efficient logistical chains. The inland navigation sector is an irreplaceable transport mode for the delivery of coal to energy plants and heavy industry.
2. Due to three observations made at the turn of the year 2011-2012 of smouldering coal in the loading spaces of inland navigation vessels, the treatment of coal in the Regulations annexed to ADN has come into focus. It has been speculated that coal, because of the dangerous attributes of class 4.2, should not be carried in bulk in inland navigation vessels.
3. This proposal creates the basis to allow the carriage of coal in bulk in accordance with the regulations for the transport of dangerous goods by inland navigation vessels. Any missing information in the following proposal should be added at the meeting of the ADN Safety Committee.

II. Amendment proposals

4. In Part 3, Chapter 3.2, Table A:

For UN 1361, CARBON, animal or vegetable origin, with Packing Group II in column 4, insert a "B" in column 8.

For UN 1361, CARBON, animal or vegetable origin, with Packing Group III in column 4, insert a "B" in column 8.

5. In Part 3, Chapter 3.2, Table A:

For UN 1361, CARBON, animal or vegetable origin, with Packing Group II in column 4, insert a reference to Special Provision "803" in column 6.

For UN 1361, CARBON, animal or vegetable origin, with Packing Group III in column 4, insert a reference to Special Provision "803" in column 6.

6. In Part 3, Chapter 3.3, add the following new Special Provision:

"803 This substance is not subject to the provisions of ADN if the following conditions are met:

- (a) A loading temperature of x degrees Celsius is not exceeded,
- (b) Temperature monitoring during the journey is carried out.
- (c) The estimated time of the journey is not longer than x days.
- (d) During loading, the crew receives instructions on how to proceed if the cargo exceeds a temperature of x degrees Celsius during the journey."

III. Justification

7. Coal has been transported in bulk by inland navigation vessels for more than 200 years. Its self-heating properties are well known. Compared with the volume of coal transported, the number of incidents with self-heating coal on board inland navigation vessels is negligible.

8. If self-heating is detected on board an inland navigation vessel it can be easily dealt with by unloading the affected parts. There is no safety-related risk from self-heating coal for the crew, the transporting vessel or other vessels.

9. The measures specified under proposed Special Provision 803 (a) to (d) are appropriate for keeping self-heating within acceptable limits and tackling it when necessary.

IV. Additional remarks

10. Irrespective of the proposals made above, EBU asks that the term "CARBON", used in the *Orange Book*, be checked in the different languages of ADN and be amended if needed.

11. Furthermore, EBU asks for an interpretation or clarification of the provisions of 7.1.4.1.1 and 7.1.4.1.2. The term "No limitation" for "other goods" is difficult to understand in relation to the maximum quantity of dangerous goods permitted on board a vessel in 7.1.4.1.2.
