

**Economic and Social Council**

Distr.: General
9 November 2016
English
Original: French

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)

Thirtieth session

Geneva, 23-27 January 2017

Item 4 (c) of the provisional agenda

Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN): interpretation of the Regulations annexed to ADN

ADN 7.1.4.7, places of loading and unloading for dry cargo vessels

Transmitted by the Government of Germany* **

Summary

Executive summary:	Subsection 7.1.4.7.2 ADN contains a specific requirement for places of loading and unloading at which dangerous goods for which marking with three blue cones or three blue lights is prescribed are to be loaded or unloaded. Unlike 7.1.4.7.1 ADN, it contains no requirements for the availability of means of evacuation.
Action to be taken:	Discussion in the ADN Safety Committee Communication of the interpretation of the text in the report of the meeting
Related documents:	ECE/ADN/27, ECE/TRANS/WP.15/AC.2/60, para. 15

* Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR-ZKR/ADN/WP.15/AC.2/2017/11.

** In accordance with the programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/2016/28/Add.1 (9.3)).



I. Introduction

1. Since the entry into force of ADN 2015, according to 7.1.4.7.1 of ADN, the means of evacuation shown in the table at 7.2.4.77 of ADN should be available at the places of loading and unloading for dry cargo vessels. Otherwise trans-shipment is permitted only with the authorization of the competent authority.
2. When this requirement was introduced into ADN 2015 (see ECE/ADN/27), in the opinion of the German delegation no account was taken of the fact that, in 7.1.4.7.2 of ADN, there is a specific provision dealing with the designation of places of loading and unloading for goods of Class 1 and goods of Classes 4.1 or 5.2 for which marking with three blue cones/lights is prescribed.

II. Question of interpretation

3. Germany is of the opinion that means of evacuation must obviously be available at the places of loading and unloading specifically mentioned in 7.1.4.7.2 of ADN. The argument supporting this view is that the last column in the table of “Possible means of evacuation in case of an emergency” at 7.1.4.77 of ADN, on “Container and packaged goods”, mentions **all** classes, including classes 1, 4.1 and 5.2. Subsection 7.1.4.7.1 of ADN could be regarded as a general requirement for all places of loading and unloading for all categories of dangerous goods.
4. The importance of 7.1.4.7.2 of ADN lies in the fact that dangerous goods of classes 1, 4.1 and 5.2 for which three blue cones or blue lights are prescribed must be explicitly mentioned when a place of loading and unloading needs to be designated. When loading and unloading such goods, a particular, increased risk arises from the need to display three blue cones or blue lights. Special account needs to be taken of this risk when designating places of loading and unloading, for example, near workshops or commercial or industrial installations, or residential areas (cf. requirement for minimum distances for berthing, ADN 7.1.5.4.3, third subparagraph). This particular risk confirms the need to make an appropriate means of evacuation available.

III. Position of Germany

5. Germany requests the Safety Committee to consider this matter and confirm the above interpretation.
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