

Economic Commission for Europe

Inland Transport Committee

22 August 2018

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)**

Thirty-third session

Geneva, 27–31 August 2018

Item 5 of the provisional agenda

Reports of informal working groups

**Letter of support to proposal in
ECE/TRANS/WP.15/AC.2/2018/39**

Transmitted by FETSA, EBU/ESO, Fuels Europe and EBOTA

Mr. Helmut Rein
Chairman of the UNECE and Safety Committee

Robert Schuman Platz 1
D-53175 BONN
GERMANY

Antwerp, July 30th 2018

Concerning: Support for an adaptation of the "European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN)".

Dear Mister Rein

The purpose of the "European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN)", (Geneva, May 26, 2000) has 3 main goals:

- ensuring a high level of safety of international carriage of dangerous goods by inland waterways;
- contributing effectively to the protection of the environment by preventing any pollution resulting from accidents or incidents during such carriage; and
- facilitating transport operations and promoting international trade in dangerous goods.

"Loading on top" in inland waterway barges is a frequent and well-controlled operation performed in the various ports in Belgium and the Netherlands, and can be done in a proven safe manner.


With the rise of cleaner fuels and the mandatory adding of biofuels or - components to conventional fuels on board of inland waterway tankers, it is expected that the demand for "loading on top" will increase. This should be encouraged as it will help to stimulate the use of cleaner fuels.

With no specific rules in ADN on the topic of "loading on top", the competent authorities for environment and transport in Belgium, are ambiguous about permitting this type of operation which is common practice. It is therefore important that the uncertainties because of these ambiguities are being addressed as soon as possible.

In this context, the Port of Antwerp, endorse the pledge of the Federation of European Tank Storage Associations (FETSA), the EU Refining Industry (Fuels Europe), the European Skippers Organization (ESO), the European Barge Union (EBU) and the European Bulk Oil Traders Association" (EBOTA) to explicitly include and allow "loading on top" under strict conditions in the ADN.

This way, we are convinced that authorities and stakeholders will be given handles to be able to safely and compliantly continue the current practice, which will have a positive effect on trade and environment. This fully aligns with the purposes of the ADN.

Yours sincerely,



Paul Wauters
Harbour Master
Maritime Safety