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INLAND TRANSPORT COMMITTEE

**Working Party on the Transport
of Dangerous Goods**

**(Sixty-eighth session,
agenda item 4 (b),
Geneva, 5-19 May 2000)**

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Fire-fighting appliances (ADR marginal 10 240 / para. 8.1.3)

Transmitted by the Government of Germany

Executive summary: Marginal 10 240 (Fire-fighting appliances) is not compatible with marginal 10 385(8) (Instructions in writing) of ADR; it is complex and should be harmonized with Standard EN 3.

Action to be taken: Simplification of ADR marginal 10 240 / new para. 8.1.3

- requiring always two fire extinguishers of the same capacity,
- stipulating one uniform inspection period;
- not requiring any specific extinguishants for fires involving the load, but introducing instead a uniform fire classification with categories A, B and C.

Related documents: TRANS/WP.15/1999/30, TRANS/WP.15/1999/42
TRANS/WP.15/157/Add.1

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Introduction

At the last session of the Working Party, the German proposal TRANS/WP.15/ 1999/42 was discussed and the French proposal TRANS/WP.15/1999/30 was adopted.

Germany was asked to submit a revised proposal taking into consideration the results of the discussions and the INF papers which had been submitted (INF 18 – IRU and INF 23 – Belgium).

The representative of Germany announced that it would submit a proposal for amendment which would be intended to simplify marginal 10 240 of ADR as a whole, and in particular to adjust it to EN standards which had in the meantime been set up. Note: The French proposal (TRANS/WP.15/1999/30) has been included in the following new proposal.

Proposal:

Amendment to paragraph 8.1.3 (marginal 10 240)

8.1.3.1 Every transport unit carrying dangerous goods shall be equipped with at least two portable fire extinguishers of fire classification categories A, B and C of a minimum capacity of 6kg dry powder (or equivalent rating for other suitable extinguishing agents).

Motor vehicles with a permissible laden weight of less than 3.5 tons may be equipped with two portable fire extinguishers each having a minimum capacity of 2 kg dry powder (or equivalent rating for other suitable extinguishing agents).

8.1.3.2 The fire extinguishers shall undergo periodic inspections by persons authorized by the competent authority at intervals of not more than 12 months to check that they are in working order.

8.1.3.3 The portable fire extinguishers conforming to the provisions of paragraph 8.1.3.1 above shall be fitted with a seal verifying that they have not been used. In addition, they shall bear a mark of compliance with standard EN 3 and inscription indicating the date of the last inspection and the date when they should next be inspected.

8.1.3.4 Fire extinguishers which do not conform to the EN standard may be used until 1 January 2007, provided that they are in compliance with the provisions of marginal 10 240, as amended on, and a national standard and are marked accordingly.

The first periodic inspection shall be performed not later than [not more than 1 year after the entry into force (2001)].

Justification

Marginal 10 240 of ADR is extremely complex and is in addition incompatible with marginal 10 385 (8). Marginal 10 385 (8), for example, requires the driver of the vehicle not to extinguish any fire involving the load; marginal 10 240 (2), on the other hand, requires the fire extinguisher also to be suitable for fighting a fire involving the load.

Because the fire extinguishers need from now on be suitable only for fighting a fire in the engine or cab or one involving the vehicle (e.g. tyres), it would be possible to carry two fire extinguishers of the same type on the vehicle (simplification as regards the equipment required on the vehicle). In addition, there is no longer the problem that the extinguishing agent must also be suitable for the load. It has always been very difficult to have a suitable extinguishing agent on the vehicle. It is necessary for safety reasons to carry two fire extinguishers on the vehicle.

At the last session of the Working Party, it was therefore suggested using fire classification categories A, B and C; they were included in the new draft.

It is not very useful to have a fire extinguisher with a capacity of 2 kg on a large lorry because this capacity is far from being sufficient for fighting a fire (in practice, the fire extinguishers carried on a vehicle always have a capacity of 6 kg).

The inspection period for fire extinguishers should be in compliance with the standard recognized by the "competent authority". In Germany, it is the task of the Federal States to set up the relevant provisions: theoretically there could be as much as 16 different inspection periods. It is assumed that there are different inspection periods in the 34 Contracting States of ADR.

For reasons of safety and harmonization, the inspection period should be uniformly fixed at one year. A more extended period does not come into consideration because the constant vibration of the vehicle and other effects could be detrimental to the fire extinguishers and the extinguishing agent contained in them.

Expert knowledge is required for the inspection of fire extinguishers. Persons carrying out these inspections therefore have to be authorized by the competent authority (the wording was taken from the draft text of ADN (TRANS/WP.15/AC.2/5, marginal 10 280).)

Incidentally, the inspection period has already been fixed at 12 months in a number of European countries.

As a European standard has in the meantime been set up for fitting and marking fire extinguishers, reference to it should be made: e.g. EN 3

On the whole, a higher level of safety will be achieved as a result of the simplification and harmonization.

The change-over to the new uniform inspection period should be made within 12 months. Old fire extinguishers conforming to a national standard may continue to be used for not more than five years

especially since EN 3 has already entered into force in 1993.

Remarks concerning the INF papers which were dealt with at the most recent meeting.

INF 23 – Belgium

As regards the Belgian paper/APRAGZ, it is emphasized that a failure in 4 or 5 cases out of 50 (8 % or 10 %) is by no means acceptable. In addition, at least another five fire extinguishers must be judged negatively because of too high residual quantities of > 10 % to 30 % in the receptacle and because of delays when put into operation. Moreover, it is not clear from the paper whether the fire extinguishers were actually fitted to a vehicle.

INF – IRU

We still consider portable fire extinguishers with a capacity of 2 kg dry powder as inadequate. For portable fire extinguishers with a capacity of 6 kg dry powder, the time needed for extinguishing a fire will be eight seconds. It will hardly be possible with fire extinguishers having a smaller capacity to extinguish a fire in or at a vehicle even in the very early phase after it has started. As far as the costs are concerned which were put up for discussion, we consider it more appropriate to make higher investments in a portable fire extinguisher which is a suitable means for successfully fighting fires than to make investments in a portable fire extinguisher which, owing to its small capacity, will very probably not be suitable for this purpose.
