Large fire extinguishers – consequential amendment to special provision 594

Transmitted by the Government of Germany

Introduction

1. Special provision 225 concerning fire extinguishers of UN number 1044, which will be broadened in the context of harmonising RID/ADR/ADN with the 18th revised version of the UN Recommendations (see ECE/TRANS/WP.15/AC.1/2013/31 paragraph 18 and ECE/TRANS/ WP.15/AC.1/2013/31/Add.1) sets out which types of fire extinguishers are covered by UN number 1044. The amendment clarifies that UN 1044 also comprises large fire extinguisher and requires fire extinguishers to be manufactured, tested and approved and labelled according to the provisions of the country of manufacture.

2. Germany proposed in document ECE/TRANS/WP.15/AC.1/2013/40 a note for inclusion in SP 225 in order to clarify how to classify pressure receptacles intended to be used in fire extinguishers or in stationary fire extinguishing systems. The same proposal was also submitted to the 44th Session of the UN Sub-Committee TDG (see ST/SG/AC.10/C.3/2013/39). The proposal for the UN Sub-Committee TDG was slightly modified due to received comments and the words “under pressure” have been included. The Joint Meeting should adopt the same wording as UNSCTDG, therefore the proposal in document ECE/TRANS/WP.15/AC.1/2013/40 is modified accordingly.

3. Furthermore, the broadening of special provision 225 requires consequential amendments to special provision 594.

4. In addition, the Ad Hoc Working Group on the Harmonization of RID/ADR/ADN with the United Nations Recommendations on the Transport of Dangerous Goods decided to amend special provision 594 in the same way as special provision 225 and to refer to the provisions applied in the country of manufacture rather than the provisions of the country of manufacture (see document ECE/TRANS/WP.15/AC.1/2013/31, paragraph 18).

Proposals

5. Revised proposal for document ECE/TRANS/WP.15/AC.1/2013/40:

Add the following Note at the end of special provision 225:
"Note. Pressure receptacles intended for later use in the above-mentioned fire extinguishers or in stationary fire extinguishing systems and which are carried separately under pressure shall meet the requirements of Chapter 6.2 and all the requirements applicable to the particular dangerous goods."

6. Amend SP 594 to read as follows:

“594 The following articles, manufactured and filled according to the provisions applied in the country of manufacture, are not subject to the requirements of RID/ADR:

- UN No. 1044 fire extinguishers provided with protection against inadvertent discharge when
  - packaged in strong outer packagings or
  - large fire extinguishers carried unpackaged in accordance with special packing provision PP 91 of packing instruction P 003 of 4.1.4.1;

- UN No. 3164 articles, pressurized pneumatic or hydraulic, designed to withstand stresses greater than the internal gas pressure by virtue of transmission of force intrinsic strength of construction when packed in strong outer packagings.”