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Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Bern, 17-21 March 2014

Item 5(a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending issues**

Widening special provision 594

Transmitted by the Government of Germany¹,²

Summary

Executive summary:	The aim of this proposal is to clarify the exemption of large fire extinguishers, provided the new special packing provision PP91 of packing instruction P003 in 4.1.4.1 is complied with.
Action to be taken:	Amend special provision 594 in order to exempt large fire extinguishers, including when they do not have a strong outer packaging.
Related documents:	Informal document INF.25 and ECE/TRANS/WP.15/AC.1/132, paragraph 47 from the last Joint Meeting.

Introduction

1. Special provision 225 concerning fire extinguishers of UN number 1044, which has been broadened and harmonised between the UN Model regulations (amendments to the

¹ In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94, ECE/TRANS/2012/12, programme activity 02.7 (A1c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2014/14.

eighteenth revised edition) and RID/ADR/ADN (amendments to RID/ADR/ADN 2013), specifies which types of fire extinguishers are covered by UN 1044 in future. This extension makes clear that UN 1044 also includes large fire extinguishers, and requires that all fire extinguishers must be "manufactured, tested, approved and labelled according to the provisions applied in the country of manufacture".

2. The new special packing provision PP91 of packing instruction P003 in 4.1.4.1, which has also been harmonised between the UN Model regulations (amendments to the eighteenth revised edition) and RID/ADR/ADN (amendments to RID/ADR/ADN 2013), exempts large fire extinguishers from having a packaging, provided the conditions laid down in the special provision are met.

3. The above-mentioned extension of special provision 225 to cover large fire extinguishers and the new special packing provision PP91 of packing instruction P003 for large fire extinguishers consequently require an extension of special provision 594 for large fire extinguishers, which currently, like all other fire extinguishers, would only be exempt provided they had strong outer packagings.

Proposal

4. Special provision 594 should therefore be amended as follows:

"594 The following articles, manufactured and filled according to the provisions applied in the country of manufacture and packaged in strong outer packagings, are not subject to the requirements of RID/ADR/ADN:

(a) UN No. 1044 fire extinguishers provided with protection against inadvertent discharge, when:

- they are packed in a strong outer packaging or
- they are large fire extinguishers which meet the requirements of special packing provision PP91 of packing instruction P003 in 4.1.4.1;

(b) 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 or construction, when they are packed in a strong outer packaging.

NOTE: "*Provisions applied in the country of manufacture*" means the provisions applicable in the country of manufacture or those applicable in the country of use.".

Justification

5. The proposed amendment to special provision 594 would clarify that in future, large fire extinguishers are to be dealt with uniformly provided they meet the requirements of special packing provision PP91 of packing instruction P003 in 4.1.4.1 created for this purpose.

Safety: This proposal contributes to ensuring the safety of large fire extinguishers.

Feasibility: The application of RID/ADR/ADN in terms of the requirements for large fire extinguishers would be made easier.

Actual application: This proposal creates legal certainty.