Fire-fighting systems using a dry aerosol-forming extinguishing agent

Preliminary conclusions of the Working Group CESNI/PT

Transmitted by the Central Commission for the Navigation of the Rhine (CCNR)

1. In June 2017, Belgium, the Netherlands and Switzerland submitted a draft amendment concerning fire-fighting systems using a dry aerosol-forming extinguishing agent (see ECE/TRANS/WP.15/AC.2/2017/45).

2. One of the aims is to propose simultaneous amendments to ES-TRIN and ADN concerning fire-fighting systems using a dry aerosol-forming extinguishing agent. Therefore, on 28 and 29 June 2017, the Working Group CESNI/PT has undertaken a first examination of the draft amendment.

3. As Secretariat of the Working Group CESNI/PT, the CCNR provides this informal document in preparation of the next meeting of ADN Safety Committee.

4. The preliminary conclusions of the Working Group CESNI/PT are the following:

   (a) The draft amendment is in principle welcomed because it will reduce the administrative workload concerning individual derogations (CCNR recommendations);

   (b) The nature of the extinguishing agent (K$_2$CO$_3$ and other by-products) requires clarifications on the basis of type approval certificates and other documentations;

   (c) The provisions must be neutral regarding the commercial solutions available on the market. However, the work must start with the experience collected with derogations allowed by CCNR. The provisions will most likely be updated if new safe solutions are introduced on the market;

   (d) The need of specific provisions for the protection of the engine room against overpressure must be examined;
(e) A detailed comparison between the draft amendment and the MSC/Circ. 1270 is highly recommended, especially to ensure that provisions not covered by the type-approval certificates (such as provisions for the installation of the system on board) are included in the draft amendment;

(f) Numbering might be improved according to recent works.

5. In August 2017, the German delegation has provided some written comments, especially regarding the comparison with MSC/Circ. 1270 (see CESNI/PT (17) 62).

6. The CCNR assumes that after examination by the CESNI/PT Working Group in June 2017 and by the ADN safety Committee in August 2017, Belgium, the Netherlands and Switzerland will prepare a revised draft amendment.