

**ECONOMIC COMMISSION FOR EUROPE  
INLAND TRANSPORT COMMITTEE**

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

(Sixty-ninth session,  
Geneva, 13-17 November 2000)

**Agenda Item 4a**

**Transmitted by the Government of the United Kingdom**

**Fire-fighting Appliances  
Doc. TRANS/WP.15/2000/5**

TRANS/WP.15/2000/5 from the German government puts forward a number of proposals changing the requirements for fire extinguishers as set out in paragraph 8.1.3 (marginal 10 240). The UK government is concerned that an attempt to simplify requirements will hamper the driver's ability to tackle a fire quickly and possibly result in minor fires getting out of control.

**Type of fire extinguisher**

ADR currently allows flexibility in the type of extinguishant. Specifying categories A (for solid materials), B (for liquids) and C (for gases) as defined in EN2, effectively limits the choice to Dry Powder (DP) because any equivalent extinguisher would need to have a rating of at least 21A and 113B (the minimum performance requirement for a DP extinguisher specified under EN 3-4) and also needs to be suitable for a fire involving gas.

We do not believe it necessary to limit the choice in this way.

**Capacity/number of fire extinguishers**

ADR currently requires a 2 Kg extinguisher, suitable for fighting a fire in the engine or cab, and a 6 Kg extinguisher for fighting a tyre or brake fire. Germany is proposing to always have two 6 Kg extinguishers.

A 6 Kg extinguisher (600mm x 160mm) is considerably larger than a 2 Kg extinguisher (380mm x 110mm) and would, in most cases, be too big to fit into the cab or be easily used in the confined cab space. Fixing it outside the cab will delay the driver in tackling

an engine or cab fire and could result in the fire taking hold to such an extent that even a 6 Kg extinguisher would not be sufficient.

In an emergency the driver has a number of actions to perform. If a fire cannot be immediately brought under control, he should concentrate on calling the emergency services and ensuring people move to a safe distance away from the vehicle. Having two 6 Kg extinguishers could lead the driver to be diverted into fire fighting rather than carrying out his other duties and ensuring his own safety.

We believe that requiring two 6 Kg extinguishers will limit the ability of the driver to fight fires effectively. It is essential to allow for one extinguisher to be of a size suitable for fixing and use in the cab, so would favour the retention of the requirement for one 2 Kg and one 6 Kg extinguisher as the safest, most flexible option for fighting a fire.

### **Exemptions for fire extinguishers**

TRANS/WP.15/2000/5 proposes retaining the current lesser requirement that allows vehicles with a permissible maximum laden weight of less than 3.5 tons to have two 2 Kg extinguishers. We agree with this part of the proposal.

Additionally we believe that ADR should retain the lesser requirement in Paragraph 1.1.3.6.2 for only one 2 Kg extinguisher for vehicles carrying loads below the thresholds set out in Paragraph 1.1.3.6.3 (Marginal 10 011)

### **Periodic inspections by persons authorised by the competent authority**

ADR currently requires extinguishers to be fitted with a seal verifying they have not been used and to also bear a mark of compliance with a standard recognised by the competent authority and an inscription of the date when they should next be inspected.

TRANS/WP.15/2000/5 proposes a mandatory periodic inspection period of not more than twelve months; the person carrying out the inspection has to be authorised by the competent authority; and the extinguisher should be fitted with a seal verifying it has not been used, bear a mark of compliance with standard EN3, and inscriptions of the dates of both the last inspection and the due date of the next inspection.

We believe such prescriptive requirements are excessive. It should be left, as at present, to the national authorities to determine an appropriate quality assurance regime for all fire extinguishers, not just those used on vehicles carrying dangerous goods.