

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Interpretation of ADR

24 April 2012

Sub-section 8.1.4.4

Transmitted by the Government of Sweden

The second and third paragraphs in sub-section 8.1.4.4 mentions inspection of fire extinguishers. Sweden would like to hear the WP.15 meeting's view on which type of inspection that is intended.

The second paragraph states that the extinguisher shall bear a mark of compliance with a standard recognized by a competent authority and an inscription at least indicating the date of the next recurrent inspection, or of the maximum permissible period of use, as applicable. Even though the second paragraph does not actually state that the extinguishers must undergo an inspection, this seems to be one of the purposes with the paragraph and it would also be necessary in order to fulfill the marking requirement.

However, the third paragraph clearly states that fire extinguishers shall be subjected to inspections and that this should be in accordance with authorized national standards in order to guarantee their functional safety. This inspection is referred to as a *periodic inspection*.

The text in sub-section 8.1.4.4, second and third paragraphs, could be interpreted in two ways:

1. In addition to the provisions on marking and inscription, **the second paragraph** covers that the extinguishers undergo recurrent inspections, which in our view should cover the function of the extinguisher (that the extinguishing agent operates properly, that the pressure gauge works, that the extinguisher is provided with a safety device (wire/seal) etc.).

The third paragraph requires that the extinguishers shall be subjected to *periodic inspections* in order to guarantee their functional safety. The expression *periodic inspection* is the same inspection as already required in 6.2.3.5, meaning a test period of 5 or 10 years (according to P200).

Or

2. **The second and third paragraphs** refer to the same inspection, which objective is to guarantee the function of the extinguishers, e.g. that the extinguishing agent operates properly, that the pressure gauge works and that the extinguisher is provided with a safety device (wire/seal) etc. The only difference between the two paragraphs is that the second paragraph only deals with the marking and inscription on the extinguishers while the third holds the requirement that extinguishers shall be subject to this inspection.

Sweden would like to hear WP.15 view on this matter.