

Amendments to the requirements for fire-fighting equipment

Comments on document TRANS/WP.15/2002/9

Transmitted by the Government of Denmark

Denmark endorses some of the ideas presented in TRANS/WP.15/2002/9 concerning the requirements for fire-fighting equipment. However, it is considered that some amendments are needed.

1. Periodic inspections.

Denmark does not think it is wise to harmonize the requirements for periodic inspections. It has not been possible to come to an agreement in the framework of European Standard EN 3 and Denmark does not think it is very helpful to try to establish uniform provisions in the framework of ADR. The various national systems are very different and the fact that two alternative systems are proposed in TRANS/WP.15/2002/9 only underlines the problems of finding an acceptable compromise. In the opinion of Denmark, the two proposed systems are not comparable at all.

Denmark, therefore, proposes to introduce the reference to national standards.

Amend the proposed text in 8.1.4.2.1 as follows (new text is underlined):

”8.1.4.2.1 The portable fire extinguishers conforming to the provisions of 8.1.4.1 shall be fitted with a seal verifying that they have not been used. In addition, they shall bear a mark of compliance with a standard recognized by a competent authority and an inscription at least indicating the date (month, year) of the next recurrent inspection or of the maximum permissible period of use, as applicable.

The fire extinguishers shall ~~at least every two years,~~ be subjected to an periodic inspections in accordance with authorized national standards ~~recognized by the competent authority~~ in order to guarantee their functional safety.

~~If a system with a permissible period of use is applied the following conditions appear:~~

- ~~- The period of use is maximum five years.~~
- ~~- A periodic visual inspection recognized by the competent authority has to be carried out.”~~

2. Transitional measures

In Denmark the interval between periodic pressure tests of extinguishers is 5 years. This is believed to be the most common practice in Europe. It would be natural to establish a transitional period reflecting this fact and therefore Denmark proposes the following amendment to the proposed text for 1.6.5.5.1:

” Fire extinguishers complying with the provisions of 8.1.4 applicable until 31 December 2002 may be used until 31 December 2007 ~~2005~~.”.

If the entry into force of any new provisions is foreseen to be 1 January 2005 the corresponding transitional period should end on 31 December 2009 instead.