

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

15 November 2013

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Item 4 (c) of the provisional agenda

Transport of gases: miscellaneous

Transport of pressure receptacles for fire extinguishers

Transmitted by the expert from Germany

Introduction

1. Special provision 225 concerning fire extinguishers of UN number 1044 was broadened with the 18th revised version of the UN Recommendations to clarify that UN 1044 also comprises large fire extinguishers. The amendment requires fire extinguishers to be manufactured, tested and approved and labelled according to the provisions of the country of manufacture

2. The Joint Meeting incorporated the new text of SP 225 in the draft amendments to RID, ADR and ADN for entry into force on 1 January 2015. However, it was decided that it would be more appropriate to refer to the provisions applied in the country of manufacture rather than the provisions of the country of manufacture since fire extinguishers may be manufactured in one country in accordance with the provisions applicable in the country in which they are to be exported. It was also decided to include a note to explain that the term “provisions applied in the country of manufacture” means provisions applicable in the country of manufacture itself or provisions applicable in the countries of export where the extinguishers are to be used. (See para. 28 of ECE/TRANS/WP.15/AC.1/132).

3. The Joint Meeting also considered document ECE/TRANS/WP.15/AC.1/2013/40 proposing to incorporate a note in SP 225 in order to clarify how to classify pressure receptacles intended to be used in fire extinguishers or in stationary fire extinguishing systems. The same proposal was submitted to the Sub-Committee in document ST/SG/AC.10/C.3/2013/39. The Joint Meeting agreed to incorporate the proposed note with some modifications. The expert from Germany is of the view that the modifications of the Joint Meeting are appropriate, and, therefore, modifies the proposal in document ST/SG/AC.10/C.3/2013/39 accordingly.

4. The text added to SP 225 in ADR/RID/ADN 2015 will read as follows (see ECE/TRANS/WP.15/AC.1/132/Add.2)

“Fire extinguishers shall be manufactured, tested, approved and labelled according to the provisions applied in the country of manufacture.

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.

Fire extinguishers under this entry include:

- (a) Portable fire extinguishers for manual handling and operation;
- (b) Fire extinguishers for installation in aircraft;

- (c) Fire extinguishers mounted on wheels for manual handling;
- (d) Fire extinguishing equipment or machinery mounted on wheels or wheeled platforms or units carried similar to (small) trailers, and
- (e) Fire extinguishers composed of a non-rollable pressure drum and equipment, and handled e.g. by fork lift or crane when loaded or unloaded.

***NOTE:** Pressure receptacles which contain gases for use in the above-mentioned fire extinguishers or for use in stationary fire-fighting installations shall meet the requirements of Chapter 6.2 and all requirements applicable to the relevant gas when these pressure receptacles are carried separately.*

Proposals

5. The reference to the provisions of the country of manufacture should be reviewed with regard to the decision of the Joint Meeting.
6. Revised proposal for document ST/SG/AC.10/C.3/2013/39: Insert the following note at the end of special provision 225:

***“NOTE:** Pressure receptacles which ~~are intended for later use in the above fire~~ contain gases for use in the above-mentioned extinguishers or for use in stationary fire-fighting installations and are transported separately under pressure shall meet the requirements in Chapter 6.2 and all requirements applicable to the relevant dangerous good when these pressure receptacles are transported separately.”*
