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INLAND TRANSPORT COMMITTEE

Working Party on the Transport
of Dangerous Goods
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PART 8 OF ADR

CHAPTER 8.5 ADDITIONAL REQUIREMENT S3

Transmitted by the Government of Norway

SUMMARY

Executive Summary:	The proposal is made to ascertain that all fire extinguishers on vehicles carrying dangerous goods are in working order.
Action to be taken:	Change the text in S3 of Chapter 8.5.
Related documents:	None

Introduction

The additional requirement S3 in Ch. 8.5 is put against all Class 6.2 entries in Table A of Chapter 3.2. The present text of S3 of Ch. 8.5 exempts transport units carrying only these substances from the requirements of 8.1.4.1(b) and 8.1.4.3 regarding fire extinguishers.

While fully supporting the reasoning behind the exemption from 8.1.4.1(b), Norway does not agree with not having any requirements for the fire extinguishers required under 8.1.4.1(a).

Proposal

In additional requirement S3 of Ch. 8.5, delete "8.1.4.3".

Justification

As long as the provisions of ADR require that transport units carrying substances of Class 6.2 should carry fire extinguishers, the same regulations must apply to such extinguishers as for all other classes. The expert from Norway sees no reason that extinguishers in vehicles carrying Class 6.2 substances should not be of the same technical standard as for other classes.

Safety implications

With this change, all fire extinguishers required to be carried on transport units carrying dangerous goods under the requirements of ADR will be of the same technical standard. Furthermore, it will ensure that all fire extinguishers on such transport units will be in working order.

Feasibility

This change will entail some added costs for industry, but very few vehicles will be dedicated to transport of Class 6.2 substances only.

Enforceability

This change will make roadside controls easier, eliminating one special consideration to be made, and will thus be quicker.
