
Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Ninety-sixth session****2 May 2014**

Geneva, 6–9 May 2014

Item 6 (b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:
miscellaneous proposals****Comments on ECE/TRANS/WP.15/2014/6 - Marking of tank-
vehicles transporting fuels****Transmitted by the Government of Finland**

1. We agree with the proposal presented in ECE/TRANS/WP.15/2014/6 by France.

We support the inclusion of UN 3475 in 5.3.2.1.3 in order to simplify the modalities for affixing the orange-coloured plates. UN 3475 is carried in the same transport units with UN 1202 and 1203.

2. Regarding extinguishing agents and fire fighting techniques we believe that fire services need to be prepared for different kinds of fires in any case.

(a) At the moment three different orange-coloured plates with three different UN numbers need to be displayed in a transport unit when UN 1202, 1203 and 3475 are carried.

Even if a tank-vehicle or transport unit has all these required markings it is not always obvious in an emergency situation which tank or tank compartment is leaking / in fire.

This means that fire services need to be prepared to extinguish fire in any case, hence they need to have and use appropriate extinguishing agents or firefighting techniques anyway.

(b) Additionally, fire services need to be prepared to extinguish fire in a possible emergency situation where all tanks of a vehicle or transport units are filled with UN 3475.

(c) Nowadays fire fighters need to be prepared to extinguish bio fuel fires also in common emergency situations. As the bio fuels are more increasingly used in all vehicles.
