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INLAND TRANSPORT COMMITTEE

Working Party on the Transport
of Dangerous Goods

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IRU Reaction to TRANS/WP.15/1999/42 submitted by Germany

"Fire-fighting appliances (ADR Marginal 10 240)"

Marginal 10 260 has suffered over the years from many changes, corrections to changes, etc. Due to the many changes, the marginal was high on the "hit list" of policemen and inspectors during roadside checks. The marginal was often misunderstood by operators and inspectors. Precise national regulations are often confused with the ADR which, for instance, leaves the inspection periods to the national authorities.

Germany proposes in its document TRANS/WP.15/1999/42 to adopt even more impractical rules concerning:

1. periodic inspections at intervals of not more than 12 months,
2. increase in the capacity of one of the extinguishers from 2 to 6 kg,
3. no description of the contents of the extinguishers.

ad.1 These proposed changes are unnecessary, unrealistic and impractical. A harmonized periodic inspection interval is, in principle, a sensible idea, but a reasonable period has to be set. The IRU proposes to take the period that has been the result of research by the Belgian Control Organization, APRAGAZ.

In the annexed report (only in French) on 50 types of extinguishers, one can see how well fire extinguishers perform after being "in service" more than five years in road transport. APRAGAZ concludes that a five-year period has proven to be correct. IRU proposes to add to :

"Marginal 10 240

(3) The portable fire extinguishers conforming to the provisions of paragraph (1) above 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.

The fire extinguisher shall undergo periodic inspections at intervals of not more than five years to check whether they are in working order."

- ad. 2 The capacity of the extinguisher has always been questioned and many opinions exist among experts as to what a driver can or should do with the appliances that are at his/her disposal.

Often it is advised that a driver should not act in respect of fires in the load. A discussion on this practice could have various outcomes for the weights and the amount of fire extinguishers. IRU thinks it wise to stick, for the time being, to the present situation in which one extinguisher of 2 kg and one of 6 kg are prescribed.

IRU proposes to keep the existing text of 10 240(1).

- ad.3 As was stated above, fire extinguisher infringements are high on the "hit list" of policemen and inspectors. More than once, fines are issued because of the "wrong" contents of the extinguisher.

For reason of user friendliness, the type of contents it needs to have, must be indicated clearly.

IRU proposes:

"Marginal 10 140(2)

Fire extinguishers with which a transport unit is equipped shall contain ABC powder".
