



**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****Fifty-seventh session**

Geneva, 29 June-8 July 2020

Item 3 of the provisional agenda

Listing, classification and packing**Transport of portable fire extinguishers in accordance with
special provision 225****Transmitted by the expert from Germany*****Introduction**

1. In accordance with special provision 225 (a), the entry for fire extinguishers (UN 1044) also comprises portable fire extinguishers. While there is no definition of portable fire extinguishers, it is assumed that completed properly functioning portable fire extinguishers are meant.
2. In practice, it is not necessary to transport completed properly functioning portable fire extinguishers, in particular for service companies which regularly carry out maintenance and inspections of the fire extinguishers and transport them to workshops and/or filling facilities. Equipment components that are required for the proper functioning such as hoses and nozzles are for the most part examined on premise, left there and reattached after returning the extinguishing agent container. For the transport of new portable fire extinguishers, manufacturers mostly do not attach such components, which are enclosed, to minimize packaging.
3. The transport of portable fire extinguishers without the components necessary for the proper functioning is comparable, in terms of safety, to the transport of completed properly functioning portable fire extinguishers, as these components mounted behind the stop valve are unpressurised. It is assumed that the transport of such individual pressurized extinguishing agent containers in accordance with the current special provision 225 as a portable fire extinguisher of UN 1044 is not possible. This is true, in particular in the case of the application of the second note in special provision 225, also for the extinguishing agent container of a portable fire extinguisher, even though this note should only apply to propellant gas cylinders for fire extinguishers and cylinders for stationary fire-fighting installations.
4. If pressurised extinguishing agent containers of portable fire extinguishers are not classified as UN 1044 like completed properly functioning portable fire extinguishers, they would have to be classified either as a gas cylinder with a UN number based on the gas

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2

contained (e.g. UN 1013 for carbon dioxide) or as UN 3500 chemical under pressure, n.o.s. and would thus have to fully comply with the provisions of Chapter 6.2. However, based on special provision 225, they are manufactured, examined, approved and labelled as a component of a portable fire extinguisher in accordance with the provisions applied in the country of manufacture.

Proposal (option 1)

5. Insert an additional note between (a) and (b) of special provisions 225 as follows (new text is underlined):

“NOTE: Portable fire extinguishers shall be subject to this entry even if the components necessary for their proper functioning (e.g. hoses and nozzles) are temporarily not attached, as long as the fire extinguishers continue to be marked (labelled) as a portable fire extinguisher.”

Proposal (option 2)

6. Extend the existing second note of special provision 225 as follows (new text is underlined):

“NOTE: The entry under (a) also comprises portable fire extinguishers to which the components necessary for their proper functioning (e.g. hoses and nozzles) are temporarily not attached, as long as the fire extinguishers continue to be marked (labelled) as a portable fire extinguisher. Pressure receptacles which contain gases for use in the above-mentioned fire extinguishers (e.g. propellant gas cylinders of a portable fire extinguisher) or for use in stationary fire-fighting installations shall meet the requirements of Chapter 6.2 and all requirements applicable to the relevant dangerous goods when these pressure receptacles are transported separately.”
