
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

115th session

12 February 2024

Geneva, 2-5 April 2024

Item 5 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR:

Miscellaneous proposals

Marking of a tank-vehicle carrying UN numbers 1202, 1203 and 3475 – comments on ECE/TRANS/WP.15/2024/2

Transmitted by the International Association of Fire and Rescue Services (CTIF)

I. Introduction

1. Recently we were approached by Fuels Europe about their proposal to modify the markings of tank vehicles when they carry UN 1202, UN 1203 and UN 3475 and requested input from the CTIF Hazardous Materials Commission in regards availability of alcohol resistant firefighting foams (AR) and the difference for firefighters in dealing with the changes in formulation of next generation fuels.
2. In our expert opinion the response from emergency services will be similar and simplifying the number of placards to worst case scenario will help to streamline the response phase of the incident. If there are over 20 placards this takes time to evaluate and especially where crews have limited hazardous materials experience or are voluntary firefighters, this can cause complications.
3. The availability of AR foams depends on location although foam manufacturing suppliers do have memorandums of understanding in place to supply AR foams when required where the risk has been identified by the Fire and Rescue Service. This means that many Fire and Rescue Services where there are large oil terminals or motorway networks have stocks or can access stocks when needed from their foam manufacturer.
4. If there is a move towards more ethanol-based fuels as well as other e-fuels then the number of placards could drastically increase making the emergency response phase more prolonged in order to build the correct plan of action. Whilst we are in this transition phase of Net Zero we will see more fuels offered and within the first 30 minutes globally most fire crews will utilise the Emergency Response Guidebook to assist their response. This provides generic response guidelines for various Classes and the two guides for these UN numbers are Guide 127 flammable liquids – water miscible and Guide 128 flammable liquids – water immiscible. The major difference is the foam suggested for immiscible as AR foam and that water spray maybe ineffective. The spill procedures are identical for both guides. After 30 minutes other resources such as hazardous materials advisor will be available to support further intervention with their specialist knowledge.
5. Training would be required by Fire and Rescue Services to understand the modification, but this can be provided as part of continued professional development which all services conducted as standard to avoid skill fade.
6. In our opinion we support document ECE/TRANS/WP.15/2024/2 from Fuels Europe.