

**The UK Major Oil Companies
Safe Loading Pass Scheme**

Access to fire extinguishers – in-cab and external.

Background

The minimum requirements for fire extinguishers are given in ADR 8.1.4.1, effectively requiring

- an extinguisher of minimum capacity of 2 kg ‘suitable for fighting a fire in the engine or cab of the transport unit’;
- an extinguisher of minimum capacity of 6 kg carried on the transport unit; and
- a total (including the above) of 12 kg.

In addition ADR 8.1.4.5 gives a requirement for the extinguishers to be ‘easily accessible’ to the vehicle crew.

The Safe loading pass scheme requirements are given in the Guidance notes sections A.7.6 and B.5. Differences in interpretation of the accessibility requirements during vehicle inspections have become apparent, and the following provides additional guidance.

Confirmation of SLP inspection requirements.

1. In the case of the in-cab fire extinguisher, the existing SLPS text states that it should be ‘accessible and readily removable from its stowage position (eg its clips are free to release)’.

The practical interpretation of ‘accessible and readily removable’ is that this should be achievable from the driver’s seat. *In particular, mounting the extinguisher in the passenger footwell and behind the passenger seat are not considered to comply with this requirement.*

2. For the extinguisher carried with the tank, there have been reports of these being carried in storage boxes which are of inadequate size, resulting in difficulty in the removal and/or replacement of the extinguisher.

The practical test for being ‘accessible and readily removable from its stowage position (eg its clips are free to release)’ is that the extinguisher(s) *must be removable from its container with one hand only, and that it may be replaced in its holder with the minimum of effort.*