

## Appendix 1

### E-mail response from VOSA in respect of dry powder based fire extinguishers in taxis

**From:** Hirons, Mark [<mailto:Mark.Hirons@DVSA.GOV.UK>]  
**Sent:** 04 July 2017 11:56  
**To:** Sharkey, Marie <[MSharkey@lancaster.gov.uk](mailto:MSharkey@lancaster.gov.uk)>  
**Subject:** RE: Fire Extinguishers

Hello Marie.

Please find attached Cat of defects used at roadside and PSV testers manual used at annual test.

The sections you need to look at are

- Cat of Defects: IM21 Part 1 (page 52 action).
- PSV inspection Manual IM21 (page 2 applications) (page 6-7 action)

You will notice this refers to fire extinguishers as a correct type, i.e. **not powder**. Although I can't find a reference to why powder is not accepted as a correct type. The reason given when I did my collision investigation training was that whilst powder is a good fire extinguisher, when passengers are involved or trapped in a vehicle. Powder can restrict and even block a patients airways. That is why any other alternatives are acceptable in passenger carrying vehicles (PSV). I would urge you to consider using a similar approach in your taxi legislation, as the only difference if can see is the number of passengers carried. Be it a Taxi, Small PSV or Large PSV, they all carry passengers. Hope this helps.

Kind Regards

**Mark Hirons** | Vehicle Examiner  
Driver and Vehicle Standards Agency | Milnthorpe Railway Station, Milnthorpe, Cumbria.  
LA77LR  
Phone: Mobile: 07971 274752

Email: [Mark.Hirons@DVSA.GOV.UK](mailto:Mark.Hirons@DVSA.GOV.UK)

 Driver & Vehicle Standards Agency

Incorporating the Driving Standards Agency and Vehicle and Operator Services Agency.

Find out more about government services at [www.gov.uk/vosa](http://www.gov.uk/vosa)

## IM 21 Interior of Body

### Part 1: Public Service, Heavy Goods and Agricultural Vehicles

Description of Defect	Severity of Defect	Action	Notes
Fire extinguisher missing/empty/defective/wrong type eg. Powder	(See Note 7)	IN	
First aid equipment missing/incomplete	(See Notes 6 and 7)	IN	
Interior body panel damaged/holed/missing/protruding/insecure (See Note 8)	Likely to cause injury to any person	I	
Legal writing/warning notices missing/Illegible	-	IN	
<b>PSV Interior Fittings</b>			
Passenger communication device missing/inoperative	Where the driver is in a separate compartment (See Notes 9 and 10)	I	
	Otherwise than above	IN	
Engine cover missing/insecure	Missing from saloon or driver's compartment	I	
Engine compartment sound deadening material insecure/oil soaked	Likely to become displaced or cause a fire hazard	I	
	Otherwise than above	IN	
Graffiti/contamination on an internal surface (State location)	Likely to soil clothing	D	
	Other unauthorised writing or drawing	IN	
	Otherwise than above	IN	

**21 Interior of Body, Passenger Entrances, Exit Steps and Platforms**

**Application**

An empty first aid box will be considered as missing.

First aid kits are required for all large buses (apart from those used on local services) and on Schedule 6 Minibuses. There is no requirement to inspect the contents of a first aid kit.

If a large bus used on local services is presented for test with markings showing the presence of a first aid kit but no kit is carried this is a reason for failure unless the sign is removed or covered.

Fire extinguishers must contain water or foam and be marked BS 5423 or EN3 and have a minimum fire rating of at least 8A or 21B.

If the extinguisher is behind a glass panel the panel should not be removed for this inspection. A glass panel with a shot blasted area is only readily breakable if the shot blasted surface faces inwards (i.e. towards the fire extinguisher). If a shot blasted area faces outwards this is a reason for failure. If the glass has been shot blasted in accordance with the above paragraph, then no other device for breaking the glass is required.

Other acceptable means of gaining access to fire extinguishers or first aid kits covered by a glass panel, that we are currently aware of, are:

- A ring pull which allows the easy removal of the glazing panel, or
- Toughened glass with a break glass hammer provided.

There may be other acceptable methods which have been approved by certifying officers.

There is no requirement to check for safety markings on the glass covers of a first aid and fire extinguisher.

There are no requirements with regards to the height at which the fire extinguisher is placed.

Where a gauge is fitted to a fire extinguisher the reading shown should not be used to determine the condition of the extinguisher.

Public Service Vehicle Inspection Manual

**21 Interior of Body, Passenger Entrances, Exit Steps and Platforms**

Method of Inspection	Reason for Failure
<p>8. Check engine interior covers for presence and condition.</p> <p>9. Check interior lights for illumination of saloon interior, steps, platform, staircase and other facilities (interior lights only apply to steps for Schedule 6 minibuses).</p> <p>10. Check passenger communication with driver:</p> <ul style="list-style-type: none"> <li>a. present and operates.</li> <li>b. gives a visual indication to passengers that the bus is stopping on Bus Directive and ECE regulation vehicles which carry standing passengers.</li> </ul> <p>11. Check interior surfaces for:</p> <ul style="list-style-type: none"> <li>a. security and condition.</li> <li>b. cleanliness.</li> </ul> <p>12. Check first aid kit for:</p> <ul style="list-style-type: none"> <li>a. presence, accessibility and condition.</li> <li>b. receptacle marked.</li> </ul> <p>13. Check fire extinguisher for; presence, accessibility, suitably charged, of the correct type and its condition.</p> <p>14. Check any "other facility" (including those listed in 15-19 below) which is complete, secure and functions correctly.</p>	<p>8. Engine interior covers; missing, contaminated to a degree which constitutes a fire risk, or which allow fumes to penetrate passenger saloon.</p> <p>9. Interior lights; inadequate illumination of saloon interior, steps, platform, staircase and other facilities (interior lights only apply to steps for Schedule 6 minibuses).</p> <p>10. Passenger Communication with driver:</p> <ul style="list-style-type: none"> <li>a. missing or inoperative.</li> <li>b. does not give a visual indication to passengers that the bus is stopping on Bus Directive and ECE regulation vehicles which carry standing passengers.</li> </ul> <p>11. Interior surfaces:</p> <ul style="list-style-type: none"> <li>a. insecure or damaged so that it is likely to cause injury to passengers.</li> <li>b. contaminated so that they are likely to soil passengers clothing.</li> </ul> <p>12. First aid kit:</p> <ul style="list-style-type: none"> <li>a. missing, inaccessible or in poor or contaminated condition.</li> <li>b. receptacle not marked.</li> </ul> <p>13. Fire extinguisher; missing, inaccessible, discharged, incorrect type or in an obviously poor condition.</p> <p>14. Any "other facility" (including those listed in 15-19 below) which is; incomplete, insecure and/or incorrect function and is likely to endanger passengers.</p>