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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Perishable Foodstuffs

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PROPOSED AMENDMENTS TO THE AGREEMENT ON THE INTERNATIONAL CARRIAGE OF PERISHABLE FOODSTUFFS AND ON THE SPECIAL EQUIPMENT TO BE USED FOR SUCH CARRIAGE

Annex 1, appendix 1, paragraph 2 (c) of ATP

Submitted by the expert from Finland

Acceptable changes to insulated bodies

Background

Remarkable amount of transport equipments are exported from a country to another. According to the annex 1 appendix 1 paragraph 4 of ATP, the new country of registration shall issue a new ATP certificate. The new certificates are in most cases issued without inspection of the equipment itself but on a basis of documents mentioned in annex 1 appendix 1 paragraph 4 of ATP. Re-approval after six years in service is in many countries the first time when the equipment is inspected. During this inspection the identification, condition, construction, accessories and documents of the equipment are checked and cool-down test is carried out. If results are favourable, ATP classification of the equipment will be prolonged.

Finnish experiences show that there are remarkable deviations in the construction of the insulated bodies compared to the type tested reference bodies. Meaning that conditions in annex 1 appendix 1 paragraph 2 (c) (i) of ATP are not always satisfied. The origin of the deviations is in most cases the manufacturer of the body. Experiences also show that there are differences between countries and authorities how to interpret the conditions in annex 1 appendix 1 paragraph 2 (c) (i). It seems that need to clarify those rules and maybe making them more flexible, without losing the insulating capacity, is very obvious.

In the meeting of the International Institute of Refrigeration (IIR) sub-commission D2 in May 2004, this item was widely discussed. It was also suggested that Finland should forward an informal document to next session of WP.11.

Proposed clarifications

The notes and comments below on annex 1 appendix 1 paragraph 2 (c) (i) of ATP are based on Finnish experiences and discussions in sub-commission D2 meeting. Hopefully they are useful for improving the text of the agreement and they also point out items which shall be dealt with in ATP Handbook.

1. "The construction shall be comparable and, in particular, the insulating material and the method of insulation shall be identical"

Notes:

Different types of the equipment, e.g. trailers, semi-trailers, could be considered as comparable construction, if other conditions hereby are satisfied.

Using different surface materials compared to the reference equipment is allowed, if thickness of the insulation is not reduced and if changing the surface material does not reduce the insulating capacity of the body.

Shelf or inlay for refrigeration unit may be added to the front part of the body, if compared to the reference equipment, the change does not reduce the insulating capacity.

Best available insulating materials, but different compared to the materials of the reference equipment, are allowed to use for repairing the damaged body, if using equal materials is for legislative reasons not possible.

2. "The thickness of the insulating material shall be not less than that of the reference equipment"

Note:

Reducing the thickness of the insulation, compared to the reference equipment, in some parts of the body and compensating the change by increasing the insulation in some other parts of the body, is now allowed.

3. "The interior fittings shall be identical or simplified"

Comments:

In Finland there is strong sympathy with proposals allowing some additional accessories compared to the reference equipment. French proposal to annex 1 appendix 1 paragraph 2 (c) in document TRANS/WP.11/2004/8 is quite acceptable.

Removing insulating material will cause some rise of the k-value. To ensure that k-value remains below limit, the French proposal could be modified, if it is not acceptable as it is now, by applying the procedure proposed only if initial k-value is lower than limit value. How much lower, is to be discussed.

4. "The number of doors and the number of hatches or other openings shall be the same or less"

Note: One door is allowed to be replaced by not more than four vents.

Comment: Instead of the number of doors, hatches and other openings, the perimeter of the doors etc. could be the determining factor.

5. "The inside surface area of the body shall not be as much as 20% greater or smaller"

Note: Limit is exactly 20 %. Inside surface area plus or minus 20,1% do not fulfil the requirement.