

**Economic Commission for Europe**

**Inland Transport Committee**

**1 October 2018**

**Working Party on the Transport of Perishable Foodstuffs**

**Seventy-fourth session**

Geneva, 8-12 October 2018

Item 6 (a) of the provisional agenda

**Proposals of amendments to ATP:**

**pending proposals**

---

**Statement of Trailers and Bodies branch group of  
Technology Industries of Finland regarding  
ECE/TRANS/WP.11/2018/5**

**Transmitted by the Government of Finland**



9/28/2018

Trailers and Bodies branch group

## **Luke – Natural Resources Institute Finland**

### **Proposals of amendments to ATP**

We, the Trailers and Bodies branch group of Technology Industries of Finland, thank for the possibility to provide a statement concerning the proposal of amendments ECE/TRANS/WP.11/2018/5 of ATP.

The Trailers and Bodies branch group of Technology Industries of Finland comprehensively represents the Finnish producers of trailers and bodies. There are nearly 30 member companies in our branch group.

The Trailers and Bodies branch group opposes the proposal of amendments to ATP, which takes a position on the airflow rate of a refrigerating appliance. In the proposal of amendments, air circulation is required to be 60 times the volume of the load compartment per hour. There are concerns about the even distribution of temperature in the load compartment. However, the proposed means alone does not guarantee the even distribution of temperature in the load compartment. Furthermore, the proposal of amendments prevents obtaining the ATP classification for larger load compartments.

Setting the airflow rate to the level as proposed will lead into a situation, in which the larger trailers produced in Finland under the current dimensions will be left without the ATP classification. Moreover, a functioning ATP system for the growing load compartments will be missing in the future.

In Finland, a significant part of the transportation of foodstuffs within the country is carried out by ATP classified vehicles. In case the amendment to ATP is approved, the quality of the transportation of foodstuffs in Finland may be lowered, as the trailers no longer would receive the ATP classification. In addition, the power restrictions for diesel engines as of the beginning of 2019, will restrict the installations of temperature adjustment systems.

An example of a load compartment requiring a ATP classification: a trailer with an external length of 13.5 meters has the following internal measures: length approx. 13.3. meters, height 3.15 meters, and width 2.5 meters. The inner volume of the load compartment is therefore 104 m<sup>3</sup>. The required airflow rate power is (x 60) 6284 m<sup>3</sup>/h. The members of the branch group are not aware of any refrigerating appliance, provided by the appliance suppliers, with sufficient airflow rate that suits the purpose. Such appliances have been enquired from several suppliers, such as Thermo King, Lumikko and Carrier.

Furthermore, we propose that in ATP, there will be no possibilities for exemptions from the requirements with specific agreements between individual countries, as specific agreements make the whole ATP redundant.

Trailers and bodies branch group  
Technology Industries of Finland