
Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Perishable Foodstuffs****5 November 2010****Sixty-sixth session**

Geneva, 9-12 November 2010

Item 5 (a) of the provisional agenda

Proposals for amendments to the ATP: Pending issues

**Position of Transfrigoroute International Working Group
2/ATP****Transmitted by Transfrigoroute International**1) 12 year repeat test

TI does not support the proposal to impose a K value test on vehicles over 12 years old. TI supports the use of a pull down test at 6, 9 and 12 years as being the most cost effective and practical methodology to determine the suitability of a vehicle to continue to be used in either class C or class A.

Furthermore TI supports and recommends continuous strict maintenance and repairs of both bodies and refrigeration equipment to ensure the optimum temperature management of the vehicle irrespective of age.

2) Non autonomous retests

TI supports the principle of these re-tests, however it would appear that the proposals were originally drafted with vehicle engine driven compressors (direct drive) in mind. TI recommends that WP.11 re-examine the proposal to ensure all other current technologies, other than autonomous drive systems, are adequately covered. The committee should also ensure that the re-test periods should be the same for all technologies and that no one technology should be treated less favourably to avoid distortion of competition.

TI does not agree with the proposal on removable power sources (diesel generator sets). TI also favours the alignment of any new proposals in this area with the work being done on drafting the new CEN based on DIN 8959.

TI views the lack of harmonization of the application of the ATP retest rules as a serious issue and urges the committee to put in place systems to ensure that all transporters in the signatory countries are treated equally so as to avoid any possible distortion of competition.

3) Type approval certificates

Having examined and debated the proposal for a new type approval certificate, TI has concluded that this proposal adds no value to the process and will most likely cause more unnecessary administrative work for transporters as well as additional costs. On this basis TI does not support this proposal.

4) Multi-temperature test methodology

TI is very anxious to conclude the discussions on this long running project and to present proposals for discussions to the 2011 WP.11 meeting.

Since the last meeting of WP.11, significant progress has been made by the active inclusion of the body building industry in the process.

Agreement has now been reached by the body building industry of the impact of the K values test of the intermediate bulkheads, both transverse and longitudinal on the cooling load required by each compartment. The refrigeration industry has arrived at an agreement.

The next steps are to combine the work of the body building and refrigeration industry sectors into a single document for discussion in 2011.

5) Multi-temperature multi lateral agreement between France, Italy, Spain and Portugal.

TI has discussed this multilateral agreement. While it is acknowledged that the ATP agreement allows for such agreements, TI recommends a more comprehensive / global approach by all signatory countries.

It is hoped that the conclusion of the preparation of the TI proposal on the suggested test methodology next year may facilitate a broader approach being taken.
