Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Perishable Foodstuffs **14 July2014**

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Geneva, 7-10 October 2014
Item 5 (b) of the provisional agenda
Proposals of amendments to the ATP: New proposals

Proposal regarding references to standards in Annexes to the ATP and the revision of references to certain standards in Annexes to the ATP

Submitted by the Russian Federation

SUMMARY	
Substance of the proposal:	Alongside international standards (ISO, AMCA), Annexes to the ATP contain references to regional (EN) and national (BS– Great Britain; DIN – Germany; NEN – Netherlands; NF – France) standards. Yet regional and national standards may only be applied in the relevant countries and are not valid with respect to all ATP signatories. Furthermore, many standards referenced in Annexes to the ATP are either obsolete or misnamed or unavailable in public information sources on standardization, specifically, in the Russian Federation. The approach to referencing standards should be revised, while ensuring compliance with the relevant ATP requirements.
Proposed solution:	It is the view of the Russian Federation that the ATP may only reference international ISO standards or explicitly specify, in place of the existing references, the implied requirements that should be mandatory for all ATP signatories.
Reference information:	N.A.

Introduction

1. At its 69th session, the Working Party on Transport of Perishable Foodstuffs broadly discussed references to standards in the ATP to the effect that:

standards change often and references to standards in the ATP consequently require updating;

a distinction should be drawn between standards that are mandatory and those that are not;

regional and national standards are not applicable in all countries contracting into the ATP;

WP.11 Rules of Procedure should be amended to include provisions on introduction of new standards into the ATP;

an informal working group should be set up to evaluate references to standards proposed for inclusion in the ATP and to check whether existing references are still valid.

The discussion revealed two positions:

The proposals set out in the document ECE/TRANS/WP.11/2013/16 (Netherlands), including, *inter alia*, proposed amendments to the WP.11 Rules of Procedure for including

provisions on adoption of new standards in the ATP and on establishment of an informal working group to evaluate references to standards proposed for adoption and to check whether references to standards existing in the ATP are still valid (the position was voted on);

that of the Russian Federation maintaining that, if retained, the existing references to standards in the ATP impose illegal obligations on, specifically, the Russian Federation to comply with regional (European) and national standards and that, if references to standards other than ISO are included in the ATP, a specific reservation should be made therein stating that regional and national standards are only applicable in certain countries.

The Working Party agreed, however, that the issue of references to standards in the ATP was important and should be kept on the agenda for the 70th WP.11 session.

It was proposed at the 69thWP.11 session that the Russian Federation prepare an informal document to clarify its position on the matter for the 70th WP.11 session.

2. Russian specialists have analyzed the references to standards in the ATP (See Table), which revealed the following:

2.1. The ATP contains references not only to **international** but also **regional** and **national** standards.

International standards in the ATP include **ISO** (International Organization for Standardization) and **AMCA** (Air Movement and Control Association International, Inc.) standards.

Among other things, 46 ATP contracting parties are ISO members (with the exception of Andorra and Monaco), including 39 full ISO members and 7 associated ISO members.

Furthermore, 10 of the ATP contracting parties (Denmark, France, Germany, Italy, the Netherlands, Spain, Sweden, Ukraine, the United Kingdom, and the USA) are AMCA members.

Regional standards in the ATP include European standards (**EN**) adopted by the European Committee for Standardization (**CEN**), with the right to be applied on a par with identical national standards and supersede inconsistent national standards.

According to directive 98/34/EC, **CEN** is the only recognized European body responsible for planning, developing and adopting European standards in all spheres of economic activity, except for CENELEC (European Committee for Electrotechnical Standardization) and ETSI (European Telecommunications Standards Institute).

CEN members include national standardization authorities from 28 European Union (EU) member States, the former Yugoslav Republic of Macedonia, Turkey and three members of the European Free Trade Association (EFTA): Iceland, Norway and Switzerland, including 29 of the 33 CEN members involved in the ATP as contracting parties (Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, former Yugoslav Republic of Macedonia, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Turkey, and United Kingdom).

National standards referenced in the ATP include British standards (BS), German standards (DIN), Dutch standards (NEN) and French standards (NF).

Considering the likelihood of the AMCA 210-07 standard being redesignated as ANSI/AMCA Standard 210-07, ANSI/ASHRAE 51-07, the ATP might end up referencing US standards: the national ANSI (American National Standards Institute) and ASHRAE (American Society of Heating, Refrigerating, and Air-Conditioning Engineers) standards.

2.2. The status of certain standards referenced in the current version of the ATP has changed, so they have been replaced with other standards:

BS 3122 has been replaced with BS EN 13771-1:2003, BS 3122-2:1990 and BS EN 12900:2013;

BS 848 has been replaced with BS 848-1:2007, BS EN ISO 5801:2008;

AMCA 210-07 has most likely been replaced with, *inter alia*, ANSI/AMCA Standard 210-07, ANSI/ASHRAE 51-07;

DIN 24163 (DIN 24163-1:1985, DIN 24163-2:1985 and DIN 24163-3:1985) has been replaced with DIN EN ISO 5801:2011;

NF E36-101-1981 (ATP contains a reference to an incorrectly designated NF standard, NFE 36101) has been replaced with NF EN 14511-2 – 2013 and NF EN 14511-3 – 2013;

NF X10.102 (NF X10-102-1992) has been replaced with NF EN ISO 5167-1 – 2003.

In public information sources on standardization in the Russian Federation, the EN 13486 and EN 12830 standards are designated as BS EN 13486:2002, DIN EN 13486-2000, and BS EN 12830:1999, DIN EN 12830-1999, respectively, since European EN standards are commonly designated in the Russian Federation as BS EN (if in English) or DIN EN (if in German).

2.3. Some standards referenced in the ATP:

are unavailable in public information sources on standardization, at least in the Russian Federation: ISO 971, AMCA 210-85 (possibly, as a result of a change in status), DIN 4796;

are incorrectly designated: ISO 971 (correct designation - ISO 917:1989), NFE 36101 (correct designation - NF E36-101), NF X10.102 (correct designation - NF X10-102).

2.4. The last passage of Annex 1, Appendix 2, paragraph 4.3.2 to the ATP stipulates use of only German (DIN) and Dutch (NEN) national standards; yet it ends in "etc.", most likely suggesting that any other, including national, standards setting forth requirements on the testing procedure may be used.

3. The analysis of the entire range of standards referenced in the current version of the ATP has revealed that standards are obviously being constantly updated and their designations and status change as a consequence.

To update continuously references to standards in the ATP by designating informal working groups to assess the references, as well as to ascertain continuously whether the existing references are still valid, would be a non-constructive and costly solution.

Furthermore, references to regional and national standards of a number of countries included in the ATP are unacceptable to other countries.

Consequently, the Russian Federation suggests adopting a different approach to references to standards in the ATP.

Proposed Approach

4. The ATP should contain references to standards recognized by all contracting parties to the ATP, i.e., the international ISO standards.

Where the ISO system lacks a standard required for the purposes of the ATP, a reference to the corresponding regional or national standard could be made, with the general reservation to be included in the ATP that such standards may only be applied in countries where they

are applicable, whereas other countries in which such standards are not applicable may be guided by relevant requirements of the regional and national standards specified in the ATP, while relying on their national standards.

The Russian Federation considers it necessary to discuss these approaches to including references to standards in the ATP and Annexes thereto at the 70th session of the Working Party.

Rationale

5. The Russian Federation agrees with the argumentation provided by the Netherlands in the ECE/TRANS/WP.11/2013/16 (Netherlands) document to the effect that references included in the ATP or Annexes thereto should be binding on all contracting parties and be approved by the contracting parties; the document (standard) to which a reference is included in the ATP should be available to all contracting parties to the ATP for assessment of its contents.

6. Yet the Russian Federation also believes that standards referenced in the ATP or Annexes thereto must be applicable in all ATP contracting countries. This could be achieved by using ISO standards or by including specifications of the requirements to be met during relevant testing and measurement procedures in the ATP or Annexes thereto.

Costs

7. No extra costs are anticipated, since all the contracting parties to the ATP and the WP.11 Secretariat exchange documents in electronic format.

Practicability

8. A transition period might be required for implementing the solutions proposed by the Russian Federation.

9. The proposed changes would create a better environment for compliance with the ATP requirements.

Challenges of ensuring compliance

10. No problems are anticipated.

Table

Information on standards referenced in the ATP obtained from standardization information sources in the Russian Federation

ATP passage containing references to standards[1]	Standard referenced in the ATP	Standard Details		
		Designation	**Name**	**Status (current, withdrawn, superseded)**
Annex 1, Appendix 2, Paragraph 4.3.2, last passage	ISO 971	Wrong designation of the standard in the ATP. ISO 971 cannot be found in any information sources on standardization in the Russian Federation. Reference to ISO 971 must be replaced with a reference to ISO 917:1989 “Testing of refrigerant compressors” in the ATP.		
		ISO 917:1989	Testing of refrigerant compressors	Current
	BS 3122	BS 3122-1:1977	Refrigerant compressors. Methods of test for performance	Superseded by BS 3122-1:1990
		BS 3122-1:1990	Refrigerant compressors. Methods of test for performance	Superseded by BS EN 13771-1:2003
		BS EN 13771-1:2003	Compressor and condensing units for refrigeration. Performance testing and test methods. Refrigerant compressors	Current
		BS 3122-2:1979	Refrigerant compressors. Method for presentation of performance data	Superseded by BS 3122-2:1990
		BS 3122-2:1990	Refrigerant compressors. Method for presentation of performance data	Current
		BS EN 12900:2013	Refrigerant compressors. Rating conditions, tolerances and presentation of manufacturer's performance data	Current
	DIN	Deutsches Institut fuer Normung e.V.(DIN) is the entity responsible for DIN standards.		
	NEN	The Netherlands Standardization Institute (NEN) is the entity responsible for NEN standards.		

ATP passage containing references to standards[1]	Standard referenced in the ATP	Standard Details		
		Designation	**Name**	**Status (current, withdrawn, superseded)**
Annex 1, Appendix 2, Paragraph 4.3.4 ii)	BS 848	BS 848-1:1980	Fans for general purposes. Methods of testing performance	Superseded by BS 848-1:2007, BS EN ISO 5801:2008
		BS 848-1:2007, BS EN ISO 5801:2008	Industrial fans. Performance testing using standardized airways	Current
	ISO 5801	ISO 5801:2007, ISO 5801:2007/Cor.1:2008	Industrial fans - Performance testing using standardized airways	Current
	AMCA 210-85	**AMCA 210-85 cannot be found in any information sources on standardization in the Russian Federation, possibly, due to a change of status.**		
	AMCA 210-07	AMCA 210-07	Laboratory Methods of Testing Fans for Aerodynamic Performance Rating	Not specified but the designation AMCA 210-07 has obviously been changed to ANSI/AMCA Standard 210-07, ANSI/ASHRAE 51-07
		ANSI/AMCA Standard 210-07, ANSI/ASHRAE 51-07 ▪ANSI means standards developed by the American National Standards Institute ▪ASHRAE means standards developed by the American Society of Heating, Refrigerating, and Air-Conditioning Engineers	Laboratory Methods of Testing Fans for Aerodynamic Performance Rating	Current
	DIN 24163	DIN 24163-1:1985	Fans; performance testing, standard characteristics	Superseded by DIN EN ISO 5801:201
		DIN 24163-2:1985	Fans; performance testing, standardized test airways	Superseded by DIN EN ISO 5801:2011

ATP passage containing references to standards[1]	Standard referenced in the ATP	Standard Details		
		Designation	**Name**	**Status (current, withdrawn, superseded)**
		DIN 24163-3:1985	Fans; performance testing of small fans using standardized test airways	Superseded by DIN EN ISO 5801:2011
		DIN EN ISO 5801:2011	Industrial fans - Performance testing using standardized airways (ISO 5801:2007, including Corr 1:2008); German version EN ISO 5801:2008	Current
	DIN 4796	**DIN 4796 cannot be found in any information sources on standardization in the Russian Federation.**		
	NFE 36101	**Wrong designation of the standard in the ATP.**		
		NF E36-101-1981	AIR CONDITIONING. ROOM AIR CONDITIONERS WITH AIR-COOLED CONDENSERS. GENERAL. CONSTRUCTIONAL CHARACTERISTICS. METHODS OF TEST MARKING.	Superseded, replaced by NF EN 814-2-1997
		NF EN 814-2-1997	Air conditioners and heat pumps with electrically driven compressors. Cooling mode. Part 2: testing and requirements for marking.	Superseded by NF EN 14511-2 – 2013 and NF EN 14511-3 - 2013
		NF EN 14511-2 - 2013	Air conditioners, liquid chilling packages and heat pumps with electrically driven compressors for space heating and cooling - Part 2: Test conditions	Current
		NF EN 14511-3 - 2013	Air conditioners, liquid chilling packages and heat pumps with electrically driven compressors for space heating and cooling - Part 3: Test methods	Current
	NF X10.102	NF X10-102-1992	MEASUREMENT OF FLUID FLOW BY MEANS OF PRESSURE DIFFERENTIAL DEVICES. PART 1: ORIFICE PLATES, NOZZLES AND VENTURI TUBES INSERTED IN CIRCULAR CROSS-SECTION CONDUITS RUNNING FULL.	Superseded by NF EN ISO 5167-1

ATP passage containing references to standards[1]	Standard referenced in the ATP	Standard Details		
		Designation	**Name**	**Status (current, withdrawn, superseded)**
		NF EN ISO 5167-1 - 2003	Measurement of fluid flow by means of pressure differential devices inserted in circular cross-section conduits running full - Part 1: General principles and requirements	Current
Annex 2, Appendix 1, Paragraph 2	EN 13486	BS EN 13486:2002[2] DIN EN 13486-2000[2]	Temperature recorders and thermometers for the transport, storage and distribution of chilled, frozen, deep-frozen/quick-frozen food and ice cream – Periodic verification	Current
Annex 2, Appendix 1, Paragraph 3	EN 12830	BS EN 12830:1999[2] DIN EN 12830-1999[2]	Temperature recorders for the transport, storage and distribution of chilled, frozen, deep-frozen/quick-frozen food and ice cream – Tests, performance, suitability	Current

[1] As amended as of 23 September 2013;

[2] In the Russian Federation, **European standards EN** are most commonly designated as **BS EN** (if in English) or **DIN EN** (if in German).