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Item 5 (a) of the provisional agenda

Proposals for amendments to ATP: Pending proposals

Renewal of ATP certificates beyond 12 years*

Transmitted by the Government of France

Note by the secretariat

France has transmitted a revised version of ECE/TRANS/WP.11/2009/12, considered at the sixty-fifth session. Changes are underlined.

* Submitted in accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106; ECE/TRANS/2010/8, programme activity 02.11).

Introduction

1. For many years, France has issued certificates under ATP for equipment over 12 years old only after testing the insulating capacity and efficiency of individual items of equipment at an official ATP testing station or, for uniform batches of equipment manufactured to the same specifications over a period not exceeding 12 months, of a representative sample selected at random from the batch.
2. On the basis of these tests (350 per year), this equipment can be estimated to age at a rate of 5% per year, although that rate varies significantly (between 2% and 10% per year). Therefore, it cannot be assumed that this equipment should be downgraded. Some remains in its original category, while other equipment may be downgraded, and some is no longer classifiable under ATP.
3. Taking into account the rise in average and maximum temperatures worldwide, the value of the K coefficient is increasingly important. Consequently, there is a need to maintain a good K coefficient value over the years.

Proposal

4. One solution to the problem of the ageing of bodies would be to install refrigeration units with a high safety coefficient. Given that the average K coefficient value is close to $0.40 \text{ W.m}^{-2}.\text{K}^{-1}$, the capacity of the units installed on such bodies is very high. Most manufacturers seek to achieve the optimum K coefficient value for as much equipment as possible. That is why commonly manufactured bodies have a lower K coefficient value than the theoretical value.
5. In most European countries, summer temperatures are higher than they were a few years ago and, in most countries, peak temperatures are significantly higher than the reference point used in ATP (+30° C). Consequently, the risk of poor product temperatures is very high.
6. It is important to take actual measurements during the lifespan of equipment, rather than simply running performance tests similar to those conducted for renewal at six and nine years. Accordingly, France proposes that an insulation capacity and efficiency test, as specified in annex 1, appendix 2, should be a condition for the renewal of ATP certificates at 12 years and beyond.

Economic and environmental impact of the proposal

7. As such testing has a significant economic impact, due to the cost and duration of the test, it is reasonable to require testing at 12 years. The economic impact relates to the following:
 - Cost of the test (several hundred euros)
 - Immobilization of the equipment during testing (several hundred euros)
 - Maintenance (no additional cost, since necessary)
 - Impact of maintenance (lower fuel consumption)
 - Impact of production quality (difficult to determine)

8. High-consumption equipment should be avoided, in view of the price of fuel and the environmental impact of such equipment. For a vehicle with an initial K coefficient of 0.35, ageing at a rate of 5% per year (namely, $K = 0.63$ after 12 years), the increase in fuel consumption for long-distance transport (according to the Transfrigoroute consumption simulator) would be several thousand litres per year.

Conclusion

9. On the basis of the above, the objective of the proposed protocol is to harmonize renewal testing in ATP Contracting Parties and to establish a more equitable procedure for equipment and owners.

Proposed amendments

Proposal No. 1: Insulation check

Annex 1, Appendix 2

[...]

5. For the purpose of checking the insulating capacity of each piece of equipment in service as prescribed in appendix 1, paragraphs 1 (b) and 1 (c), to this annex, the competent authorities may:

- Apply the methods described in paragraphs 2.1.1 to 2.3.2 of this appendix; or
- **For equipment less than 12 years old** appoint experts to assess the fitness of the equipment for retention in one or other of the categories of insulated equipment. These experts shall take the following particulars into account and shall base their conclusions on the criteria set forth below:

[...]

Model No. 3

[...]

According to the above test results the equipment may be recognized by means of a certificate in accordance with ATP annex 1, appendix 3, valid for not more than three years **and within the 12-year equipment limit**, with the distinguishing mark IN/IR 1.

[...]

Proposal No. 2: Efficiency check

Annex 1, Appendix 2

[...]

6. **VERIFYING THE EFFECTIVENESS OF THERMAL APPLIANCES OF EQUIPMENT IN SERVICE**

To verify as prescribed in appendix 1, paragraphs 1 (b) and 1 (c), to this annex the efficiency of the thermal appliance of each item of refrigerated, mechanically refrigerated or heated equipment in service **less than 12 years**, the competent authorities may:

[...]

And models Nos. 7, 8 and 9

[...]

According to the above test results the equipment may be recognized by means of a certificate in accordance with ATP annex 1, appendix 3, valid for not more than three years, **within the 12-year equipment limit**, with the distinguishing mark

[...]
