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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Perishable foodstuffs
(Sixty-second session,
Geneva, 6-9 November 2006)

ANNEX 1, APPENDIX 2, PARAGRAPH 49(b)

Comments on document ECE/TRANS/WP.11/2006/5
transmitted by the Government of Sweden

Introduction

During the 59th session of the Working Party the representative of Germany proposed for the first time to add to the ATP Agreement a detailed table of average outside temperatures for Classes A, B and C to ensure that different test results, and therefore a different classification at various ambient temperatures, could not be obtained for the same equipment. The proposal has been discussed also at the 60th and 61st meetings.

The representatives of Finland and Sweden have said that, after checking their databases, although their respective countries had carried out tests in accordance with the data in the proposed table, they had arrived at rejection rates of 27% and 26% respectively for FRC vehicles.

The Working Party requested the representatives of Finland, France, Germany, the Netherlands and Sweden to set up a small group to prepare a proposal for the next session. The results of the work of the informal group is shown in document ECE/TRANS/WP.11/2006/5

However, the representative of Sweden was, unfortunately, not in the position to participate in the work of the informal working group. Therefore, Sweden would like to take this opportunity to comment the outcome of the work of the informal working group and to explain the Swedish position regarding this proposal in this document.

Comments

Sweden supports the principle of this proposal, but would like to have answers on the queries indicated below with regard to the fleet of equipment in service before it can support the proposal in full.

During the different discussions concerning the introduction of a detailed table of average outside temperatures for Classes A, B and C e.g. the representative of Sweden has said that he would like to see:

- a cost/benefit analysis,
- details should be supplied of the procedures on which the figures in the table were based,

In addition, according to his view, it would be necessary to specify the date of application of the new provisions and their applicability to equipment already in service.

Justification

In document ECE/TRANS/WP.11/2006/5 there is still no answers to the above-mentioned queries. Due to the lack of answers, the Swedish delegation is still not in a position to support the proposal submitted by Germany.

Additional

Sweden would like to draw the Working Party's attention to document ECE/TRANS/WP.11/2005/9 in which a proposal for an amended text preceding the table is made. The document has so far not been discussed properly.
