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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Perishable Foodstuffs****3 October 2013****Sixty-ninth session**

Geneva, 8-11 October 2013

**Item 5 (a) of the provisional agenda****Proposals of amendments to the ATP: Pending proposals**

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## **Replies to the questionnaire**

### **Transmitted by the Netherlands**

Document ECE/TRANS/WP.11/2012/10 raised a number of topics coming from ambiguous wording in the regulations. The topic of the ATP plate was discussed at length but due to time restraints could not be finished. On the suggestion of the chairman, WP.11 agreed that the Netherlands would prepare a questionnaire for the next meeting (see paragraph 33 in the report ECE/TRANS/WP.11/226).

The questionnaire became available later than anticipated and was forwarded by the secretariat on 12 July 2013, close to the holiday season. As a result filled in questionnaires came in late as well.

Up till 26 September a total of 12 reactions were received. The reactions came from; USA, Bosnia and Herzegovina, Spain, Greece, Germany(manufacturers), Germany(Government and testing stations), UK, Denmark, Portugal, Finland, Serbia, and CLCCR.

Due to the late answers there was insufficient time to evaluate the answers in depth. In some cases additional information was given in a number of filled in questionnaires. The results on the main questions are given in a table on the following pages.

For a number of topics there is a clear indication about the position of the group, on others like the use of Thermal maritime containers the position of the group is divided.

It is proposed to mandate an informal working group to study the results and come with answers on a number of fundamental topics such as the origin of the K coefficient limits, the purpose of markings, minimum functioning time of thermal appliances, use of maritime thermal containers etc.

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1	Placement of requirements on use of special transport equipment	Yes	No	No opinion
1a	Would you support the simplification of the treaty itself and to transpose the detailed “use” requirements to a new annex 1?	6	4	2
2	Sea transport of Perishable Foodstuffs in ATP special equipment:	Yes	No	No opinion
2a	Would you support a proposal to delete the 150 km rule by stating that if the ATP special equipment is conveyed by other modes than rail or road, temperature conditions shall be maintained?	6	4	2
2b	Would you support a proposal to increase the distance of 150 kilometers to take into account popular shipping routes in the Baltic sea and between Portugal and UK?	2	4	6
3	Inland transport of Perishable foodstuffs in containers classified as maritime thermal in combination with a sea voyage:	Yes	No	No opinion
3a	Do you agree with the principle of “inland” use of Maritime thermal containers in a combination of sea voyage?	5	2	5
3b	Would you support a proposal to delete the 150 km rule for containers in combination with a sea voyage?	3	5	4
3c	Would you be in favor to include additional requirements for this use, such as an electrical power supply above a certain transport distance/duration inland?	4	4	4
4	Use of non ATP approved containers classified as maritime thermal for “Inland” transport by road and rail.	Yes	No	No opinion
4a	Do you support the principle of using non ATP approved ISO 1496-2 containers (load worthy/CSC) for multi-modal inland transport operations?	5	3	4
5	Scope of ATP-Facilitating transport/free placing on the market of special transport equipment	Yes	No	No opinion
5a	Are you of the opinion that free placing on the market should be in the scope of the agreement?	7	3	2
5b	Do you agree that the manufacturer of equipment shall only have tests/type approvals in testing station approved or designated by the competent authority in the country in which the manufacturer is established?	4	7	1
6	Ability to maintain temperature for a determined period of time by the insulation (K-values)	Yes	No	No opinion
6a	Do you agree that it would be appropriate to include basic requirements on which performance of the insulation is based?	4	3	5
7	Autonomy of ATP special transport equipment and minimum period of functioning.	Yes	No	No opinion
7a	Do you agree that a thermal appliance shall be able to function for 12 hour at least without refilling/refreezing/recharging?	9	2	1
7b	Do you agree that autonomous equipment should be self supporting, not dependent of vehicle movement or functioning of the vehicle engine?	9	2	1
7c	Do you agree that equipment classified as IR or IN are non autonomous?	5	3	4
8	Ageing and safety factor	Yes	No	No opinion
8a	Are you of the opinion that the additional capacity due to the safety factor was introduced to counter the effects of ageing of the insulation of the body?	8	2	2
8b	Are you of the opinion that the additional capacity due to the safety factor was introduced to counter the effects of the variations allowed in the type of body?	5	4	3

9	Transport documentation	Yes	No	No opinion
9a	Do you support an amendment to include new requirements to make specific information on the transport document obligatory	4	5	3
10	ATP plate	Yes	No	No opinion
10a	Are you of the opinion that the ATP plate shall be marked for compliance?	8	2	2
10b	Are you of the opinion that the information on the ATP plate is sufficient?	9	1	2
10c	Do you agree that the ATP plate need only be removed when the equipment is finally taken out of ATP service and/or no longer complies with the standards of Annex 1? If the validity of the approved period ends but the equipment can be re-checked for compliance I may remain in position.	10	1	1
11	ATP certificate	Yes	No	No opinion
11a	Would you support a proposal to simplify the certificate by limiting the number of technical items if these items would appear on a conformity of production document of the manufacturer?	2	7	3
12	Distinguishing marks	Yes	No	No opinion
12a	Do you agree that the purpose of markings should be clarified	4	5	3
12b	Are you of the opinion that ATP markings should be covered when the particular carriage is not under the scope of ATP?	1	7	4
12c	Do you agree that the Distinguishing marks may remain on the equipment after the validity of the certification has expired but the equipment is not definitely out of ATP service?	5	6	1
12d	Do you agree that the special marking "X" means that extra care of priority is required at stops?	9	1	2
12e	Do you agree that placing the markings "near the front" is usable for road vehicles to determination the position of the markings but not for rail-way wagons or containers/swap bodies.	2	5	5
13	Separate approval insulating body and thermal appliance of ATP equipment.	Yes	No	No opinion
13a	Would you agree to amend this rule and have a separate test and approval for the thermal appliance and the insulate body?	3	5	4
13b	Do you agree that the safety factor of 1.75 should apply to all equipment (except IN and IR) when the thermal appliance is tested separately?	6	3	3
14	Type approval	Yes	No	No opinion
14a	Do you agree that the issue of a type approval certificate is a separate act by a competent authority?	7	3	2
14b	Do you agree that the issue of a type approval certificate shall be linked with a check that the manufacturer is able to produce within the type?	7	2	3
15	Periodic checks of the insulated body	Yes	No	No opinion
15a	Do you agree that the examination by the appointed expert is no verification of insulating capacity but a examination of the condition of the body?	8	2	2
15b	Do you agree that testing 1% of insulated bodies of a type in use with one owner is no guarantee that the condition of other units are in the same favorable state to allow for an extended period of 6 years to the next periodic check? Owner can be a rental, leasing company even an investment company with totally different use and degradation.	7	2	3
15c	Would you support an amendment to simplify the provisions to allow only for "expert" verification with a next periodic check after 3 years and a limitation to 12 years of use?	4	7	1

16	Periodic checks of the thermal appliance	Yes	No	No opinion
16a	Do you agree, to save unnecessary cost and prevent pollution, that this test should only be prescribed if the effectiveness of the thermal appliance can degrade from the initial or limit its functioning?	3	5	4
16b	Do you agree that thermal appliances which contain regulation devices that can degrade or fail after time due to ageing should not be approved for a longer period than 3 years, even if the effectiveness is confirmed in a testing station?	1	8	3
16c	Do you agree that testing 1% of thermal appliances of the same time of 1 owner or user is no guarantee that the condition of other units is in the same favorable state? Owner can be a rental, leasing company even an investment company with totally different use.	7	3	2
16d	Would you support an amendment to simplify provisions to allow only for "expert" verification with a next periodic check after 3 years?	3	6	3

17	Requirements for manufacturers	Yes	No	No opinion
17a	Do you agree that additional provisions for manufacturers obligations should be introduced?	3	6	3
17b	Do you agree that additional production facilities (of the manufacturers) in other countries are acceptable for to production according to the type approval? (see also question 5c1)	4	3	5
17c	Are you of the opinion that final assembly of insulated <u>bodies</u> by other parties than the manufacturer can be allowed under predetermined conditions?	4	4	4

18	Requirements for testing stations	Yes	No	No opinion
18a	Do you agree that additional requirements are needed to regulate the functioning and designation or approval of testing stations?	5	5	2

19	Requirements for experts	Yes	No	No opinion
19a	Do you agree that additional requirements are needed to regulate the functioning of appointed experts?	6	4	2