
Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Perishable Foodstuffs****23 September 2013****Sixty-ninth session**

Geneva, 8-11 October 2013

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

**Comments on document ECE/TRANS/WP.11/2013/10, part 1
Acceptable changes to insulated equipment****Transmitted by Finland**

It should be clearly stated that the modifications shall be done by or they shall be approved by the manufacturer of the equipment (body).

The amendments shall apply to equipment which is manufactured after the amendment has entered into force.

It should be clearly defined how the volume of the insulating material, V_{im} , of the body is determined. For example outside volume, V_o , of the body minus inside volume, V_i , of the body, $V_{im}=V_o-V_i$. As the inside surface area of serially produced bodies may differ by up to 20% from the type tested body, it should also be defined what is the reference V_{im} used for calculating $1/100^{th}$ of the total volume of the insulating material. Is it V_{im} of the type tested body or V_{im} of the serially produced body in question? For reasons of simplicity it might be recommended to use as reference V_{im} the value of type tested body. This reference V_{im} could then be printed on the type test report.

The proposed text for the ATP Handbook dealing with openings and perimeter of seals needs some clarification.

“- the number of openings, such as doors, hatches or air flaps shall be the same or less or may be increased by more openings of smaller sizes provided that the total perimeter of the seals is equal or less.”

Does it mean that if a serially produced body is 20% bigger (inside surface area) than the type tested body it still may have as many doors and opening as the type tested body, in spite of the fact that the perimeter of the seals in this case is obviously longer than the perimeter in the type tested body?

Presumably this is the practice in most ATP countries at the moment.

Does it also mean that if the body is 20% smaller than the type tested body it then may have additional vent(s) or door(s) on the condition that the perimeter of the seals is not longer than the perimeter in the type tested body?

It should be considered that in such a situation the amount of seals per surface area is increased compared to the type tested body which obviously has a negative effect on the insulation capacity.