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| **INF.12** |
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Reaction on ECE/TRANS/WP.11/2020/1/Rev1,   
Independence of mechanically refrigerated equipment exclusively electrically driven

Transmitted by the Government of the Netherlands

Introduction

1 Due to the energy transition new options are going to be used. Traditionally Mechanical refrigerated units on road vehicles are driven by combustion engines and with an optional electric drive. It is a trend that the combustion engine is deleted and the drive is exclusively electric. This is not a novelty because maritime (Reefer) containers are mainly electrically driven only.

2 Test stations and competent authorities alike are confronted with the question when equipment on road vehicles may be seen as independent in regard to the possible (nominal) capacity of electricity on board of the equipment/vehicle itself.

3 As alternative to the proposal in document ECE/TRANS/WP.11/2020/1 the following text could be considered:

Proposal 1: Introduce a new 4.5.4 and renumber the current 4.5.4 as 4.5.5.

*“4.5.4 Capacity of electrical energy*

*To be regarded as independent, mechanically refrigerated equipment with electric drive only shall have an electrical energy supply to allow 4 hours of functioning. The power may be supplied by a battery set, battery set with fuel cell, or a generator set permanently fixed to the equipment itself.*

*In other cases equipment shall be regarded as Non-independent and marked with an X after the classification code on the equipment.*

*[In addition the maximum electrical energy requirement for the equipment shall be marked in Watts near the plug to power the equipment.]*

*Note:  
When an energy supply is used from another vehicle, such as the tractor for a semi-trailer or a “clip-on” generator set, the equipment shall be regarded as non-independent. A battery set in combination with solar panel only is not seen as a storage system because the capacity cannot be guaranteed due to fluctuations in solar radiation.*

*4.5.5* Test reports”

Rest unchanged…

Proposal 2: In Annex 1, Appendix 4 at the end for paragraph 2 add a new indent to read:

*“2.3 Where the equipment does not comply with the requirement of Annex 1, Appendix 2 paragraph 4.5.4. “*

Proposal 3: Introduce a new transitional measure in Annex 1 to read:

*“6.2 Mechanical refrigerated equipment with only an electric drive system that do not comply with the requirement for independent as given in Annex 1, Appendix 2 paragraph 4.5.4 and are not marked accordingly may continue to be used until the next periodic check for conformity after 1 October 2022. “*

Justification

4. Test stations and competent authorities alike are faced with the questions on this relative new situation for road going equipment. It is of great importance that a uniform procedure shall be applied by all contracting parties.

5. For test stations determining the maximum capacity of the mechanically refrigerated unit seems to be less of an issue. The issue is more for experts combining the individual insulated body with the unit where the question arises what about the guaranteed capacity of electrical energy that can be available.

6. For consigners, users and control authorities it is important to realize that something in addition may be required when using an equipment that is not fully independent. For example a driver pics up a semi-trailer with his tractor realizing that the equipment needs plugging in to connection from the generator set on the tractor or another energy source shall be taken along for a particular journey.