



Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Perishable Foodstuffs****Seventy-fourth session**

Geneva, 8-12 October 2018

Item 6 (b) of the provisional agenda

**Proposals of amendments to ATP:
new proposals****Proposal to amend Model No. 12, Annex 1, Appendix 2:
Validity of test reports for mechanical refrigeration units****Transmitted by the Government of Germany***Summary*

Executive summary: As long as no modifications relevant to ATP are carried out on a refrigeration unit, a re-test of a formerly approved type of refrigeration unit only repeats the results of the first test and does not lead to any new findings. Therefore, it should be possible to extend the validity of a Type Approval Certificate for an unmodified refrigeration unit based on the verification by the competent authority that the refrigeration unit is manufactured in conformity with the formerly approved type.

Action to be taken: Amend Model No. 12, Annex 1, Appendix 2

Related documents: ECE/TRANS/WP.11/2015/1

Introduction

1. At the seventy-first session in 2015, the United Kingdom transmitted proposal ECE/TRANS/WP.11/2015/1 which resulted in the following addendum to Model No. 12, Annex 1, Appendix 2:

“According to the above test results, this report shall be valid as a certificate of type approval within the meaning of ATP Annex 1, Appendix 1, paragraph 6 (a) only for a period of not more than six years, that is until”

2. Before this addendum came into effect, the validity of Type Approval Certificates for refrigeration units had not been subject to any time limitation as long as no modifications relevant to ATP had been carried out on the formerly approved type.
3. As long as no modifications relevant to ATP are carried out on a refrigeration unit, a re-test of a formerly approved type of a refrigeration unit only repeats the results of the first test and therefore does not lead to any new findings.
4. For small and medium-size manufacturers of refrigeration units, the limitation of the validity of test reports presents a serious economic burden, since these manufacturers often follow the specific needs of their customers. Consequently, they offer a wide range of specifically designed products which usually are manufactured in small numbers, very different to mass production.
5. Once the manufacturer holds a Type Approval Certificate, often no modifications relevant to ATP are carried out on the tested refrigeration unit for years. The costs for mandatory re-tests at 6-year intervals for unmodified refrigeration units are unreasonably high, especially for multi-temperature units.
6. Germany points out that a refrigeration unit as such does not fall under the definition of equipment. Therefore, the reference in Annex 1, Appendix 2, Model No. 12 to Annex 1, Appendix 1, paragraph 6 (a) is misleading. At present, the ATP text does not include any provision for appliances that is comparable to Annex 1, Appendix 1, paragraph 6 (a). The lack of a comparable provision for appliances is due to the fact that the components of a transport refrigeration unit – other than insulated equipment – can be easily accessed. This makes it possible to inspect with the naked eye whether the components of the transport refrigeration unit in question match the tested unit's components which are described in the type test report.

Proposed amendment

7. Insert the following text in Model No. 12, Annex 1, Appendix 2 in (d) Remarks:

“If no modifications relevant to ATP have been carried out on a formerly approved type of refrigeration unit, the validity of the test report for the respective refrigeration unit may be extended for a period of 3 years based on the verification by the competent authority that the refrigeration unit is manufactured in conformity with the formerly approved type.

The verification shall be submitted within a month after the Type Approval Certificate or the recent verification has expired. The verification by the competent authority may be reissued at intervals of 3 years.”

Impact

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| Cost: | The costs for re-tests of unmodified formerly approved types of refrigeration units will be significantly reduced. |
| Feasibility: | The proposed amendment can easily be implemented in ATP. A transitional period is not needed. |
| Enforceability: | No problems are expected. |