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## **Economic Commission for Europe**

### **Inland Transport Committee**

#### **Working Party on Customs Questions affecting Transport**

##### **134rd session**

Geneva, 11–14 June 2013

Item 8 (b) (ii) of the provisional agenda

##### **Customs Convention on the International Transport of Goods under Cover of TIR Carnets (TIR Convention, 1975):**

##### **Revision of the Convention - Amendment proposals for the Convention: vehicles with sliding sheets**

### **Vehicles and containers with sliding sheets**

#### **Comments on the revised amendment proposals as laid down in document ECE/TRANS/WP.30/2012/6/Rev.3**

**Transmitted by the International Association of the Body and Trailer Building  
Industry (CLCCR)**

## **I. Introduction**

1. At its 131st, 132nd and 133rd session, the Working Party (WP.30) considered document ECE/TRANS/WP.30/2012/6 and its revisions submitted by the International Association of the Body and Trailer Building Industry (CLCCR), containing amendment proposals in order to add to the TIR Convention a new design of a vehicle and container. The secretariat, CLCCR and other delegations concerned were requested to submit rectified amendment proposals to the present session (ECE/TRANS/WP.30/266, para. 35). Following this request, the secretariat has issued a revised document ECE/TRANS/WP.30/2012/6/Rev.3.

2. CLCCR proposed some modifications and observations to document ECE/TRANS/WP.30/2012/6/Rev.3 which are reproduced below for consideration of the Working Party. In view of the deadline for official submission, the secretariat was not in a position to include these comments into document ECE/TRANS/WP.30/2012/6/Rev.3.

## II. Comments by CLCCR

3. ECE/TRANS/WP.30/2012/6/Rev.3 proposes to add a new Article 5 to Annex 2 and a new Article 6 to Annex 7. In both Articles, in point 2, the following provisions are included:

(ii)....The horizontal opening between the sliding roof and the upper cantrail of the load compartment may not exceed 10 mm measured perpendicular to the longitudinal axis of the vehicle /container at any place when the load compartment is secured and sealed for Customs purposes.

(iii) The distance between the connecting discs shall not exceed 200 mm.

4. For the provision (ii) "... The horizontal opening between the sliding roof and the upper cantrail of the load compartment may not exceed 10 mm...", it is technical wise not possible to pre-stress the rope with this length in such a way that the measurement (10 mm) can be fulfilled. CLCCR asks that this provision should be deleted. The other provisions under point 2 (ii) in the new articles can be kept.

5. For the provision (iii) "The distance between the connecting discs shall not exceed 200 mm", CLCCR indicates that describing this distance is not necessary due to the fact that it is already described with (ii) that it should be not possible to pull the hemline with the pre-stressed steel rope over the upper cantrail. This 200 mm distance only make sense to secure sheeted vehicle like it is described in Annex 2, Article 3, point 8. CLCCR states that with this distance the roof is not movable anymore. CLCCR asks that provision 2 (iii) should be deleted.

6. CLCCR reminds that in TIRExB Informal document No.8 (2006), CLCCR proposed to include the following generic provision for Annex 2 and Annex 7: " No goods must be able to be removed from or introduced into the sealed part ...this means...it must not be possible to introduce a hand, a packet of cigarettes or another object in to the load compartment...". Such a generic provision should make other detailed provisions superfluous.

7. ECE/TRANS/WP.30/2012/6/Rev.3 proposes to add Sketch 9.4 b) "Gearbox" to Annex 2 and to Annex 7. In this sketch it is imposed that three disks (hand crank protection) are to be welded to the axle. CCLCR indicates that one hand crank protection plate is also secure, seen the plate is 4 mm thick and this plate is welded to the chassis. Due to the fact that the axis from the crank goes smooth through this plate it is not possible to force it away from the hand crank to get space between them.