SPECIFICATIONS OF AIR TEMPERATURE MEASUREMENT AND RECORDING DEVICES USED IN TRANSPORTATION OF FROZEN, QUICK (DEEP)-FROZEN FOODSTUFFS, PRECISION AND PERIODICITY OF TEMPERATURE MEASUREMENT, LOCATION OF TEMPERATURE DETECTORS AS WELL AS DATA STORAGE ENSURING ITS CREDIBILITY AND RELIABILITY

Annex 2, Appendix 1 of ATP
ATP Handbook

Transmitted by the Russian Federation

Background

1. The general specifications of air temperature measurement and recording devices used for the transportation of frozen, quick (deep)-frozen foodstuffs are stated in the annex 2 of ATP.

2. At the 63rd session of WP.11, the Netherlands suggested in ECE/TRANS/WP.11/2007/5 to bring the specifications of temperature recording devices into line with the EN 12830 and EN 13486 standards. The Netherlands’ proposal also implied the extension of the specifications of air temperature measurement and recording devices to railway transport. The Netherlands accordingly presented a version of annex 2 of ATP (excluding the list of goods and appendixes to annex 2).

3. The Russian Federation believes that along with the Netherlands’ proposal the new version of the document should contain the elaboration of the following items of annex 2, appendix 1 of ATP:

   a) The periodicity of temperature control of air in contact with quick-frozen foodstuffs intended for human consumption;

   b) The dependence of storage time of temperature control data on the type of foodstuffs.


Proposals

An examination of the comments to annex 2, appendix 1 of ATP in the ATP Handbook suggests that the main function of air temperature control used for the transportation of frozen, quick (deep)-frozen foodstuffs is to “facilitate inspection taking place at the end of, or even during a journey” as well for use as defence “during trade or legal disputes”.

Comment 2 to annex 2, appendix 1 of ATP stipulates that the maximum period of time between two temperature measurements depends on the length of the journey. At the same time there is no precise method of computation of the value of this interval depending on the length of the journey. Neither is the dependence specified.

Russian experts, taking into consideration the legal implications of the transport under discussion, EN 12830 specifications of temperature measurement devices as well as the most common capacities of memory units, believe that the value of the interval must not depend on the length of the journey and in all cases should not exceed 1 hour.

Hence the Russian Federation suggests the following modifications:

a) Paragraph 3 of annex 2, appendix 1 of ATP should state as follows:

_The equipment shall carry a suitable temperature measurement and recording device allowing regular, not less than once per hour, control of the temperature of air in contact with frozen, quick (deep)-frozen foodstuffs intended for human consumption._

b) **Withdraw comment 2 of annex 2, appendix 1 of ATP in the ATP Handbook.**

4. The provisions of paragraph 3 of annex 2, appendix 1 of ATP do not allow to establish the evident dependence of storage time of air temperature data collected during the journey on the type of transported foodstuffs. Neither does the ATP Handbook contain any comments about it.

Russian experts believe that on the basis of comment 1 of annex 2, appendix 1 of ATP in the ATP Handbook stipulating air temperature measurement and registration during the journey is inter alia a defence “during trade or legal disputes” it would be appropriate to link the storage time of temperature control data with the storage life of transported foodstuffs (assuming the time of transportation is included in the overall storage life).

Hence the Russian Federation forwards the following version of paragraph 3 of annex 2, appendix 1 of ATP:

_The collected temperature control data shall be dated; the operator shall keep the records for one year from the expiry of the storage time of the transported foodstuffs._