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| **INF.4** |
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Report of year 2021 from Transfrigoroute International

Transmitted by Transfrigoroute International

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| *Summary* |
| **Executive summary**: Report of year 2021 from Transfrigoroute International  **Action to be taken:**  **Related documents**: |
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A. COVID situation

In 2020, the refrigerated road transport sector has been severely impacted by the consequences of COVID-19 and the successive blanket lockdown which occurred throughout Europe. These restrictive measures particularly hit some segments of our business such as seafood and flower transport. While the repercussions of the COVID-19 crisis are deep, our sector benefitted from a strong recovery in 2021 thanks to the lifting of restrictions and the expansion of vaccination.

Throughout this crisis, Transfrigoroute International and the entire refrigerated transport sector has played an essential role in ensuring that citizens are provided with food and other basic necessities, even at the height of the pandemic. Additionally, refrigerated freight have proven to be fully operational to transport vaccines under ultra-low temperatures and therefore contributing to the sound reopening of the continent through a high vaccination coverage.

B. Context and challenges

While COVID-19 has shaken up our industry considerably in recent months, more lasting issues have emerged in recent years that are challenging and pushing our industry to reinvent itself. Climate change, which has become a priority for citizens and legislators, and population growth, particularly in urban areas, present a dual challenge that our industry seeks to address.

Transfrigoroute International is at the crossroad of two revolutions: decarbonizing all transport segments to contribute to the global, European, and national emissions reduction targets, but also transforming the refrigerant used by for our operations to render them more sustainable.

B1. Transport decarbonization:

At the European level, the new Commission had made the European Green Deal a top political priority, with the aim of transitioning Europe to a climate-neutral economy by 2050. This new growth strategy is expected to have extensive repercussions on the transport sector. Stemming from the Green Deal, the Fit for 55 and the obligations set under the mobility package require our sector to engage in an unprecedented search for alternative power train. Vehicles manufacturers are undertaking massive investments in R&D to scale-up new technologies such as electric, biofuel, natural gas, biogas, fuel cell and hydrogen power train for trucks. Their involvement will prove to be crucial for our industry to support the decarbonization efforts.

Besides the feasibility of deploying alternative fuels for vehicles, it is the long-term consequences specific to refrigerated transport that are at stake. Transfrigoroute International is facing the challenge of adapting the insulation of refrigerated trucks and the equipment of thermal appliances to these new technologies. Such an exercise requires R&D efforts that cost time and money. Overcoming this challenge will make necessary for a flexible ATP which currently does not considers the multiplicity of solutions to power thermal appliances.

B2. Refrigerant transformation

The European Commission is also engaged in the revision of several pieces of legislation such as the F-Gas Regulation and the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation to bring refrigerant gases more in line with European climate objectives. These reconsiderations are impacting Transfrigoroute International’s business. Our sector will need to investigate and come up with new technologies that implement these new requirements. This will also prove to be a timely and costly exercise.

Additionally, these rules remain incomplete as they have not yet included specific safety standards that will be applicable in the transport sector. This work is ongoing through CEN TC413 WG1 and will allow our sector to thrive under the right framework. However, this standard is not expected to be published before 2023.

Finally, these changes in legislations are having spill-over effects onto other regulations such as the Pressure Equipment Directive (PED). The unpredictability arising from the consequences of the regulatory revisions undertaken by the European Commission is negatively impacting our industry and should be considered in the evolution of ATP.

C. Need on ATP

New ATP proposals should be evaluated against those rising constraint and uncertainty. The ATP should adjust and address all new technologies to be in step with our time.

Regarding refrigerant, provision 6.2.3 allowing drop in refrigerant from R404A to R452A was a good progress and the French proposal ECE/TRANS/WP.11/2021/7 is another step in the right direction.

Concerning alternative power train, it becomes urgent to elaborate proposals formalizing a modular approach as discussed at CERTE when it comes to power sources in order to be fit for incoming technologies.

Additionally, ATP should tend to be more flexible and, in particular, the following proposals are favorable:

* Require separate test reports and type approvals (French proposal ECE/TRANS/WP.11/2021/5)
* Extend the validity of test reports (German proposal ECE/TRANS/WP.11/2021/17)
* Provide temporary certificates for prototype (TI proposal ECE/TRANS/WP.11/2021/22).

Moving forward, Transfrigoroute International suggests that all existing and future proposals be evaluated to consider the complexity of their implementation, the practicality of their application and the balance between time and costs of implementation with the expected benefits.

Given the divergent application of ATP rules between countries, in addition to receiving new amendment proposals, WP11 should further address the standard application of existing rules in all countries.

Last but not least, Transfrigoroute International suggests that key performance indicators (KPIs) be established to better measure the performance and objectives of the ATP.

This could include:

* clarifying the number of controls to be carried out on trucks and assessing the criteria for success and failure
* indicators for the number of countries that have signed the ATP could also be created
* Number of ATP certificates issued per year.

Proper implementation of these KPIs will allow for the introduction of key targets to be achieved over the next 5-10 years.