Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Perishable Foodstuffs

Eightieth session

Geneva, 24-27 October 2023 Item 5 (b) of the provisional agenda **Proposal of amendments to ATP: new proposals** 11 October 2023 English

Reflections on document ECE/TRANS/WP.11/2023/20 – adjustment of K-value for normally insulated equipment.

Transmitted by the Government of the Netherlands

1. the case we wish to pursue the proposal In in document ECE/TRANS/WP.11/2023/20 by the United Kingdom of Great Britain and Northern Ireland (UK)it is felt that the wording should be improved. The introduction of the lower Kvalue in the future means that until that time the current value is still valid. However the proposal in document ECE/TRANS/WP.11/2023/20 does not properly reflects this.

2. In addition to this it was noted that the standard value for vehicle width within the European Union had increased from 2.50 M to 2.55 M.

3. It should also be questioned if the increased vehicle width should be extended to normally insulated equipment in case the side body walls are at least 45 mm thick. This would allow loading of 33 pallets in semi-trailers and increase the insulation performance at the weakest points of the body. It would also allow the de-classification of Heavily insulated bodies with increased width to normally insulated later in life. The European Union legislation of vehicle masses and dimensions does not mention "heavily insulated" nor "ATP" for allowance of the increased vehicle width to 2.60 M.

4. Alternative proposal to Annex 1 Paragraph 1 to read:

"Insulated equipment. Equipment <u>other than tanks</u> of which is assignable to one or other of the following two categories

 $I_N = Normally insulated equipment:$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,70 \ W.m^2.K^{-1} \ for \ bodies \ that \ entered \ into \ service \ up \ to \ 31 \ December \ 2028;$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,65 \ W.m^2.K^{-1} \ For \ bodies \ that \ entered \ into \ service \ from \ the \ 1 \ January \ 2029;$ $I_R = Heavily \ insulated \ equipment:$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,40 \ W.m^2.K^{-1}$ $I_R = Heavily \ insulated \ equipment:$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,40 \ W.m^2.K^{-1}$ $I_R = Heavily \ insulated \ equipment:$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,40 \ W.m^2.K^{-1}$ $I_R = Heavily \ insulated \ equipment:$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,40 \ W.m^2.K^{-1}$ $I_R = Heavily \ insulated \ equipment:$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,40 \ W.m^2.K^{-1}$ $I_N \ Normally \ insulated \ tank \ bodies:$ $a \ K \ coefficient \ equal \ or \ less \ than \ 0,70 \ W.m^2.K^{-1}$