

Discussion proposal of WNTTE Compliance Statement

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Looking at

1. the Position Paper “basis for an engine or vehicle manufacturer’s WNTe Compliance Statement from May 2, 2005” last page with the acceptable means to proceed and
2. the existing ECE Regulation 13 annex 18 (braking Regulation with an annex on complex electronic vehicle control systems)

Text Position Paper OCE

- "(Name of manufacturer) attests that the engines within this engine family complies with the applicable WNTE emission limits when operating under all conditions which may reasonably be encountered in normal vehicle operation and use, and which are subject to the requirements of the WNTE regulation. (Name of manufacturer) makes this statement in good faith, after having performed an appropriate engineering evaluation of the engines emissions performance over a wide range of operating and ambient conditions of all the information relied upon as the basis for this statement."

Text Regulation 13 (Braking)

Annex 18

- *3.4. Safety concept of the manufacturer*
- *3.4.1. The manufacturer shall provide a statement which affirms that the strategy chosen to achieve "The System" objectives will not, under non-safe fault conditions, prejudice the operation of systems which are subject to the prescriptions of this Regulation*

proposal for discussion

1. Use of Compliance Statement with Type Approval (new)
2. Statement of manufacturer to comply with the applicable WNTE emission limits (A)
3. The basis for the WNTE Compliance Statement (B)
 - rely on data, engineering analysis, and other information

Use of Compliance Statement with type approval

- Proposed Addition to Section 11.1.
- *‘For contracting parties that operate a type approval system for vehicles and/or engines, this compliance statement is the beginning of the authorisation procedure. In addition to this statement, compliance with the WNTE limits shall be verified through additional tests and certification procedures defined by the contracting party.’*

Statement of manufacturer to comply with the applicable WNTE emission limits

➤ Put 11.1.1 as example of regional procedures in an Annex?

➤ Proposed addition to 11.1

'The statement shall affirm that the engines and the engine control strategies (ECS) within this engine family comply with the applicable WNTE emission limits when operating under all conditions which may reasonably be encountered in normal vehicle operation and use, and which are subject to the requirements of the WNTE regulation.

The manufacturer shall make this statement on the basis of the emissions performance of the engines over a wide range of operating and ambient conditions.'

The basis for the WNTE Compliance Statement

- Section 11.2 currently about regional procedures?
- Proposed replacement of 11.2 (Part 1 of 2)
‘The basis for the WNTE Compliance Statement shall be determined by the engine or vehicle manufacturer, and shall rely on data, engineering analysis, and other information sufficient for the manufacturer to have the confidence necessary to ensure compliance with the WNTE portions of the OCE GTR are met.’

The basis for the WNTE Compliance Statement

- Proposed replacement of 11.2 (Part 2 of 2)

‘As an example, the basis for the Compliance Statement could include WHTC data, WHSC data or data from laboratory testing (e.g., an emissions map of similar resolution to the engine’s base fuel injection timing map) under the conditions covered by the WNTE.

Data generated from in-use [highway] vehicle testing could also be part of this combination, or depending upon the extent of the in-use data, it could be the primary basis for the Compliance Statement.’

Thanks



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