

EMA comments on the Global Technical Regulation for Off-Cycle Emissions

(Informal document No. GRPE-56-14 of October 2008)

As shown in the table below, EMA recommends revising the Global Technical Regulation (GTR) language as currently drafted. EMA feels it is critical to revise the GTR language per the table below to provide necessary clarity, and to avoid inconsistent or erroneous interpretations.

GTR Provision	GTR Current Draft Language	EMA Proposed Language Revisions
3.2 Base Emission Strategy (“BES”)	Means an emission strategy that is active throughout the speed and load operating range of the engine unless an AES is activated	Means an emission strategy that is active throughout the speed and load operating range of the engine unless an AES is activated. An engine can have multiple BESs.
5.1.1 Requirements for Base Emission Strategies	A BES shall not discriminate between operation on an applicable type approval or certification test and other operation and provide a lesser level of emission control under conditions not substantially included in the applicable type approval or certification tests.	A BES shall not discriminate between operation on the WHDC cycle-based emission tests and other operation and provide a lesser level of emission control under engine speed and load conditions not included in the applicable emission tests. Specifically, BESs that provide emission contours over the speed-load regime that are inconsistent with and higher than the contours suggested by the WHDC cycle-based emission tests will not be allowed.

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