

INFORMAL GROUP ON GASEOUS FUEL VEHICLES
Within the UN GRPE (WP29)
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Name of Organization submitting Amendment/Work Item

Italian Delegation

Person submitting Item

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Regulation name and reference number

UN ECE Regulation 115

Remarks from the Italian delegation to GFV-04-02, GFV-04-03, GFV-04-04 & GFV-04-05

In relation with the main questions posed initially by Mr. Radzimirski and more deepened afterwards in the last two meetings by the group, I believe that the AEGPL proposals represent a good compromise between a just request of further evolution and clearness of the Regulation and the respect of its present structure that has revealed in these years of application a right level of stringency and a satisfactory manageability.

In particular, the text proposed for the scope seems to match with the targets agreed by the group and results – as turned into a positive form - more correct and readable.

As regards the emission test procedure, the AEGPL proposal is based on the same present strategy (intrusive/non-intrusive) but it seems to work more properly in specifying and clarifying the non-intrusive concept and its related evaluation assessment as well as in eliminating unjustified discrepancy between the present emission results acceptance criteria of R. 115 and those fixed in the R. 83.

As for the chassis dynamometer setting, although it is a very technical issue and would deserve a more deepening from me, I think that AEGPL rationale provide us with interesting and well motivated arguments demonstrating that the retrofit application changes the mass of the vehicle without changing the car's speed-related resistance factors. It's not another vehicle but it's the same with another weight.

With regard to switch over period, I agree to align the R 115 with what already examined and approved for gas native vehicles in the Regulation Euro 5-6, allowing in the case of previous Euro standard (Euro 3-4) cars an higher margin, so as proposed by AEGPL. That waiting for more technical evidences proving that the overall emissions of the present or near-future retrofit systems could be reduced by fixing a shorter maximum time to the petrol functioning, when operating on gas.

In conclusion, I appreciate the effort of AEGPL and the followed approach while I reserve myself to provide the group with possible specific comments about the different text proposals.