

10/05/10

IMMA comments on the draft Amendment 2 to global technical regulation No. 2 submitted by the expert from Germany (document ECE/TRANS/WP.29/GRPE/2010/10)

1. Background

In reviewing the latest proposal for draft Amendment 2 to global technical regulation No. 2 submitted by the expert from Germany (Mr. Albus), IMMA has general and specific points to make.

2. General comments

IMMA agrees that the principal emission limit values (paragraph 5.2. of the text of the regulation) should represent the most stringent limits currently applied in national or regional legislation with the test procedures set out in this gr.

IMMA disagrees that the most stringent values currently in use are the Japanese limit values stated in the document. Japan has not yet introduced the new limit values into their legislation. The values are currently under discussion at the public consultation stage and the date of implementation has not been announced. Hence, these values cannot be introduced in the principal table.

The Euro-3 limit values should be maintained as the principal emission limit values as they are the most stringent in current use. Subsequently, further amendments to the principal performance values can be agreed in GRPE and AC3, on the basis of new studies, e.g. the Japanese and European Union work on future values.

Maintaining discussions at the GRPE and AC3 level will enable the coordination of changes in emission legislation around the world, which is important for the industry at any time, but especially in the present economic situation.

IMMA remains concerned at the potential for a proliferation of different limit values to go with gtr No. 2 test cycles and would prefer as many countries as possible to adopt the Euro-3 values until new harmonized values have been agreed.

IMMA recognizes that not all contracting parties will want to mandate the principal limit values and that therefore alternatives might be necessary. If a contracting party chooses to mandate alternative limit values, it is critical for the industry that vehicles meeting the principal performance values will be recognized as already complying with such alternative requirements without further testing.

IMMA believes that introducing the "Euro-3" values will stabilize the implementation of gtr No. 2 and encourage countries throughout the world to adopt the gtr sooner rather than later. Many countries currently follow the Euro-2 limit values and the next step would be to move to Euro-3, itself a significant tightening of the requirements.

### 3. Specific points

#### 3.1 Part A (Statement of technical rationale and justification)

In paragraph 4(d) amend the text to read:

“.....set out in this gtr. **It is expected that** vehicles complying with the principal emission limits contained in paragraph 5.2. **will** also comply with the alternative requirements contained in paragraph 5.3.....”

and

“....When a Contracting Party transposes this global technical regulation in a manner that includes any of the specified alternative performance requirements, the national or regional legislation should ensure that a motorcycle that complies with the principal performance requirements in this global technical regulation will **be accepted by** the national or regional legislation.....”

#### **Justification:**

The present text is ambiguous, it could be read as meaning that vehicles complying with the principal limit values have to be tested again.

#### 3.2 Part B (Text of the regulation)

a) In paragraph 5.1, amend the text to read:

“5.1. ~~Optional~~ Performance requirements

The principal performance requirements are set out in paragraph 5.2. Contracting Parties may **in addition** accept compliance with one or more of the alternative performance requirements set out in paragraph 5.3.”

#### **Justification:**

The word “optional” implies that the limit values need not be used. IMMA recognises that contracting parties are able to implement gtrs as it suits their own situation and that to this extent everything is optional. However, the purpose of a gtr is to define the global requirements that will be acceptable everywhere. It is therefore essential for IMMA that the text makes it clear that the principal values are to be considered as the global requirements and that the alternatives may be adopted in addition to meet particular needs.

b) In table 5-1, amend the values to be those in Euro-3:

**Table 5-1**  
**Limit values for gaseous emissions CO, HC and NO<sub>x</sub>**

Vehicle Class	CO		HC		NO <sub>x</sub>	
	Class 1 and Class 2	Class 3	Class 1 and Class 2	Class 3	Class 1 and Class 2	Class 3
Limit values <i>L<sub>A</sub></i> in mg/km	<b>2620</b>	<b>2620</b>	<b>750</b>	<b>330</b>	<b>170</b>	<b>220</b>

**Justification:**

It follows from what was said in the general comments that the limits should be returned to the Euro-3 values, pending a further discussion of new studies with a view to a future amendment to come into force in 2013.

Dr NM Rogers

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