

OICA comments on the transposition process of GTR No. 15 (WLTP) into UN Regulation (1958 Agreement)

This paper is prepared and distributed by the expert from OICA. It is not however a proposal, rather an attempt to identify some areas of concern and bring them to discussion in GRPE.

1. For many years, the European Union had separate legislative acts for the measurements of Criteria Emissions (sometimes referred to as Pollutant Emissions or merely Pollutants) and of Fuel Consumption and CO₂ Emissions. This led to the establishment of UNECE Regulations 83 and 101 respectively and these UN Regulations are currently fully aligned with the EU legislation as to the measurement and limits of pollutant emissions and the measurements of fuel consumption/CO₂ emissions.
2. The tests performed to obtain these measurements were harmonised in the early 1990s in the EU and in the late 2000s the logical decision was taken to consolidate the legislative acts into the Euro 5 & 6 Regulations (EU framework directive 2007/46, Euro 5/6 regulations 715/2007, 692/2008).
3. GRPE has on occasion discussed the possibility of reflecting this combined structure (Criteria Emissions and Fuel Consumption) in the 58 agreement but for various reasons has never taken this decision. The three major hurdles to this were:
 - Administrative burden – this has two sides, the burden of splitting a European Regulation that covers both subjects and the burden for Contracting Parties to leave existing Regulations and join new ones.
 - Attractiveness of the 58 Agreement – Regulations 83 and 101 have different groups of Contracting Parties, it may appear unattractive if the choice no longer applies, i.e. all or nothing.
 - Different legislative concepts – The measurement of Criteria Emissions fits to a worst case legislative concept whereby demonstration that the vehicle complies with the expected highest emissions is a demonstration that all vehicles in the family comply. The measurement of Fuel Consumption however is predominantly made for consumer information and should be representative rather than the worst case. One may consider the measurement of CO₂ emissions to be comparable to that of Criteria Emissions as it had an environmental influence but the tendency to regulate this with financial penalties (e.g. EU fleet CO₂ Regulation) renders a worst case approach infeasible for the industry.
4. Therefore, many stakeholders are now waiting for the transposition of gtr 15 into one single Regulation under the 1958 Agreement which would replace both Regulations 83 and 101, similarly to the current EU legislation.
5. However, in view of the lack of harmonisation of gtr 15 (there are fundamental regional options such as the drive cycle) and the future integration in IWVTA*, OICA feels that the

* A concept for transposition was presented by the European Commission to GRPE in informal paper GRPE-71-19-rev.1 and to WP.29 in informal paper WP.29-167-20.

decision should not be taken lightly and that GRPE should first have a full and informed discussion on the matter.

The favoured option is to develop various levels of 58A Regulation: a top level which would be accepted by all Contracting Parties and would be the candidate for Universal IWVTA, and several lower levels representing the desired regional standards. It remains unclear whether these lower levels would be different modules or series of amendments or some other new concept and whether a hierarchy of stringency has to be defined between them. For the top level however, it is clear that a worst case approach is necessary but it is still open whether this is possible (e.g. between different cycles), whether it is would be used/usable by industry (non-usage would threaten u-IWVTA) and as stated above, whether the measurement of Fuel Consumption can be fitted to a “worst-worst case” approach as mentioned above.

6. OICA therefore requests that the GRPE IWVTA Ambassador actively informs GRPE of the plans, timing and consequences of IWVTA and that GRPE fully discuss the implications before moving forward on the transposition of WLTP into the 58 Agreement. Of course OICA will support the legislative development process fully.
