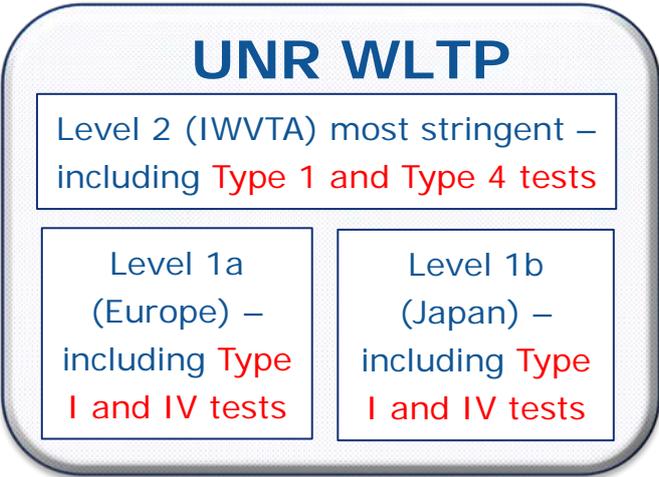
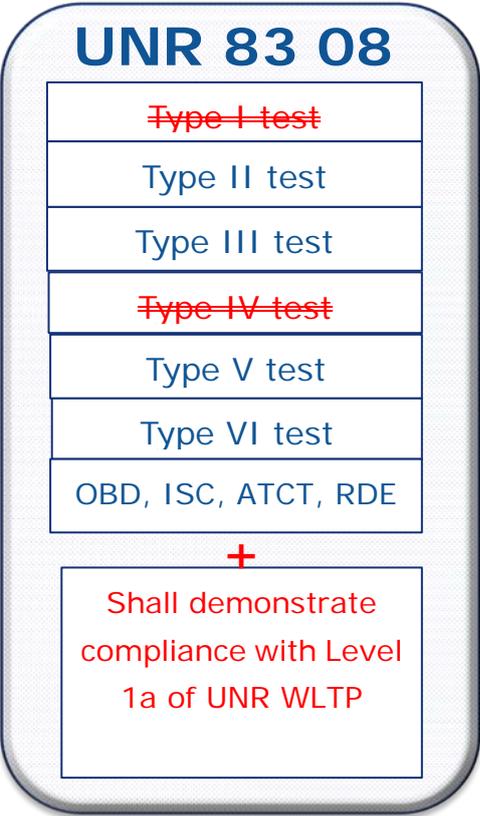


A request to OLA to shorten the period necessary to establish and amend new UN Regulation “WLTP”

The purpose of this document is to request OLA to allow an unconventional approach to be taken in establishing and amending the proposed new UN R “WLTP”. This new regulation is unusual in that it has different levels of stringency within one UN Regulation. In taking this approach, prior endorsement by WLTP Informal Group, GRPE and WP.29 shall be required.

1. Background

- At its November 2015 session WP.29 agreed to transpose UN GTR on WLTP into a UN Regulation in a hierarchical manner with different levels of stringency that reflect different national / regional requirements.
- Creation of WLTP Transposition Task Force was endorsed in June 2016 at the 169th session of WP.29.
- Kick-off meeting for WLTP Transposition Task Force was held in February 2017 and eight meetings have been held so far.
- Discussions in the Task Force resulted in the proposal to have the new UNR “WLTP” accompanied by a new 08 series of amendments to UNR 83 which would include all the other emissions requirements that are not included in the new UNR “WLTP”.



- At the 6th WLTP Transposition Task Force held in August 2017 three different approaches to establish and amend UN R “WLTP” were discussed to avoid options of requirements level 1a, 1b and 2 included in one UN Regulation.
- Three different approaches (refer to document IWVTA-25-11) were submitted to IWVTA Informal Group at its 25th session in November by the WLTP Transposition Task Force seeking advice. IWVTA Informal Group could not choose the best approach. The bottleneck for the preferred approaches is their lengthy timescales necessary for establishment and series amendment of UN R “WLTP” described below.

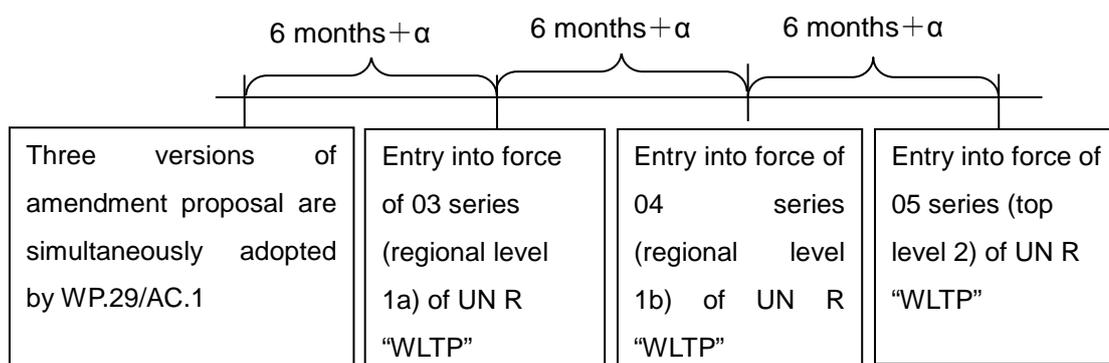
Example)

Where; - UN R “WLTP” 00 series (regional level 1a for EU)

- UN R “WLTP” 01 series (regional level 1b for Japan)

- UN R “WLTP” 02 series (top level 2)

In case requirements for both regional levels 1a and 1b are strengthened, it will take 18 months + 3 α ¹ to amend UN R “WLTP” consisting of three consecutive versions.



2. Problems

- It will take more than 18 months to establish/ amend UN R “WLTP” consisting of three consecutive versions.
- UN R “WLTP” is supposed to have introductory provisions which might say:
“As from the date of entry into force of this Regulation (03 or 04 series of amendments), Contracting Parties shall not grant type approvals according to this Regulation until the date of entry into force of 05 series of amendments (top level 2)”.

Therefore EU/Japan could not introduce 03 series of amendments (regional level 1a)/ 04 series of amendments (regional level 1b) in EU/Japan until the date of entry into force of 05 series of amendments (top level 2). Thus, Contracting Parties could not impose more stringent emission requirements in their territories in a timely fashion.

¹ “ α ” represents an administrative period of time before the 6 month period - which may be shorter under Rev.3 of the 1958 Agreement than under Rev.2.

3. Request to OLA

OLA is requested to handle three consecutive versions of UN R "WLTP" collectively and simultaneously when it is established or amended in order to shorten the timescales necessary for administration.

4. Justification

Three consecutive versions of UN R "WLTP" may not be series amendments in essence but a set of different levels of stringency for emission requirements. Therefore it would be reasonable to handle three consecutive versions of UN R "WLTP" collectively and simultaneously when it is established or amended in order to shorten the timescales necessary for administration. If at least one version of UN R "WLTP" should be rejected, all of the three versions should be regarded as rejected.