



# **Transposition of GTR15 (WLTP) into UN Regulations**

## **Update for GRPE from WLTP Transposition Task Force**

### **June 2018**



# Background

Transpose GTR15 and GTR19 into a new 'UNR WLTP' regulation

- Level 2 to contain most stringent requirements from across all regions
  - Subject to full mutual recognition: TA shall be accepted by all CPs
- Regional levels (Level 1a, 1b etc. ) to contain regional requirements
  - Optional acceptance by other CPs
- Complementary update to UNR 83 is critical for EU to become a Contracting Party to UNR WLTP and is therefore an essential element of the wider 'transposition project'
- Implications for UNR 101 to be determined
- Approach to transposition still under discussion

Please see document "GRPE-76-24e" for a more detailed introduction and description of the work being undertaken by the Transposition Task Force in developing a new UNR WLTP and new 08 series of UNR 83

# Development of 'UNR WLTP'

# Options for different levels

- Principles
  - Level 2 to contain most stringent requirements from across all regions
  - Subject to full mutual recognition: TA shall be accepted by all CPs
  - Regional levels (Level 1a, 1b etc. ) to contain regional requirements
  - Optional acceptance by other CPs
- Regional variations (options) have been identified for GTR15 and GTR19
- Options also for Durability and COP (in the short-term)
- An analysis of the options is provided in documents:
  - WLTP-23-03e\_Appendix01\_CP option.xlsx
  - WLTP-23-03e\_Appendix02 - UNR WLTP Structure and Content Draft
- Consideration of the options and agreement on the requirements of Level 2 (the Mutual Recognition level) is the major focus of the Task Force

## Development of regulatory texts

- Structures for the different levels of UNR WLTP are being developed
- Structure of the 08 series of UNR 83 is also being developed
  - Plan was to include RDE in 08 series of UNR 83. However we now need to consider implications of the potential new GTR for RDE
- Durability and COP will be essential elements of 'UNR WLTP' – use current regional procedures in interim (e.g. EU COP in Level 1a and Japan COP in Level 1b) with harmonised procedures to follow
- Detailed drafting meetings to be set up – for both UNR WLTP and UNR83 08 series.
- Drafting 'procedure/protocol/contributions' to be agreed.

## Discussion points for 77<sup>th</sup> GRPE

- Durability and COP procedures being developed under WLTP IWG
  - **Separate GTRs or Annexes to GTR15 or directly to UNR WLTP regulation?**
- How to handle future updates from the WLTP IWG for the Type 2, Type 3 and Type 6 tests in the UN Regulations?
  - **No urgent decision needed. Included in order to raise awareness at GRPE.**
- Regulation 101 – how to take account of introduction of UNR WLTP?
- Approach to transposition
  - **Which Approach to move forward with?**



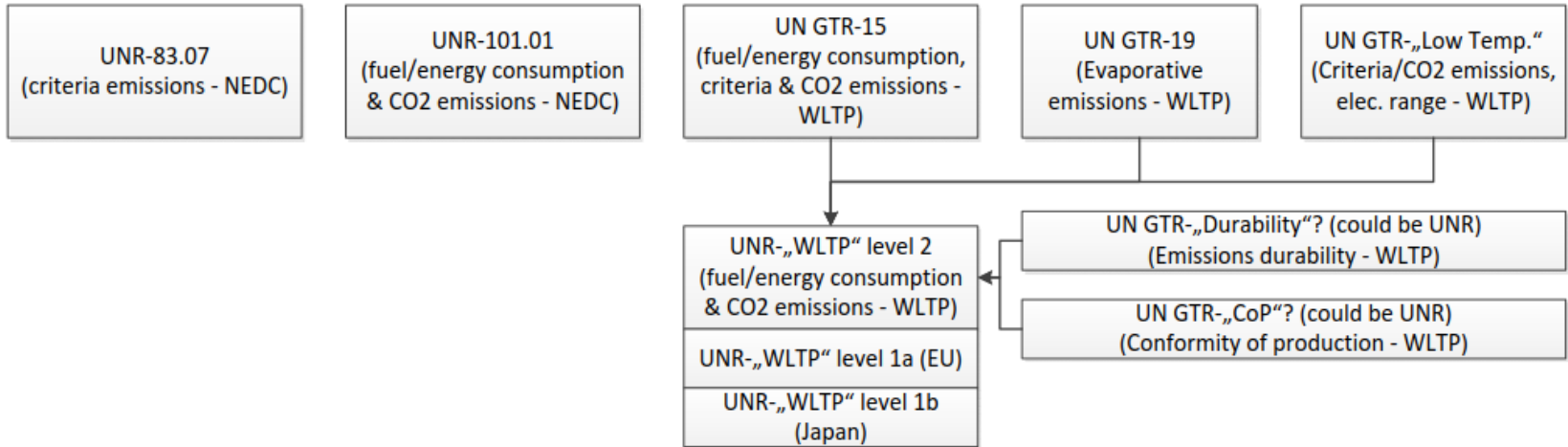
European  
Commission

# Regulation 101

## How to handle UNR 101

- For over 30 years we've had criteria emissions legislation where fuel consumption and CO<sub>2</sub> values were a bi-product. With WLTP it is the other way around and we now have fuel consumption and CO<sub>2</sub> legislation where demonstration of criteria emissions compliance is a bi-product.
- Europe combined the subjects of criteria emissions and fuel consumption and CO<sub>2</sub> emissions in one piece of legislation in 2007, UNR83 and UNR101 however remain separate.
- We need to find solutions which cover both subjects, in all current and new UNRs to the satisfaction of all Contracting Parties to both Agreements without creating undue burden or problems for the industry.
- Some ideas to prompt a constructive discussion are shown on the next slide and a list of the Contracting Parties to UNR83 and UNR101 on the following slide.





UNR-83.08 – **Criteria emissions**  
(crankcase, idle, OBD, ISC, RDE, ATCT + ref to UNR-„WLTP“)

UNR-101.02  
(ref to UNR-„WLTP“)

Option 1: „handle R83 & R101 equally“ - would mean that CPs wishing to stay with NEDC require transitional provisions to prevent them having to accept R 101.02 (& R 83.07?) approvals

UNR-83.08 – **Criteria emissions**  
(crankcase, idle, OBD, ISC, RDE, ATCT + ref to UNR-„WLTP“)



Option 2: „freeze R101 at NEDC“ - would mean that CPs wishing to move to WLTP have to exit R 101 and could therefore no longer issue approvals for export.

UNR-83.08 – **Criteria emissions**  
(crankcase, idle, OBD, ISC, RDE, ATCT + ref to UNR-„WLTP“)

UNR-101.02  
(NEDC test plus ref to UNR-„WLTP“)

Option 3: „NEDC & WLTP in R101.02“ - would mean that CPs wishing to move to WLTP have to exit R 101 and could therefore no longer issue approvals for export.

UNR-83.08 – **Criteria & CO2 emissions, fuel/energy consumption**  
(crankcase, idle, OBD, ISC, RDE, ATCT + ref to UNR-„WLTP“)



Option 4: „combine R101.02 into R83.08“ - would mean that CPs wishing to move to WLTP have to exit R 101 and could therefore no longer issue approvals for export.

Note: Azerbaijan and Tunisia are CPs to R 101 but not R 83

Source: Bill Coleman



<i>ECE symbols</i>	<i>Contracting Parties to UNR 83.07</i>	<i>Date of application</i>	<i>Minimum acceptable for IWVTA</i>	<i>Contracting Parties to UNR 101.01</i>	<i>Date of application</i>	<i>Minimum acceptable for IWVTA</i>
E 1	Germany	05.11.1989		Germany	01.01.1997	
E 2	France	05.11.1989		France	01.01.1997	
E 3	Italy	18.12.1989		Italy	01.01.1997	
E 4	Netherlands	05.11.1989		Netherlands	01.01.1997	
E 5	Sweden <sup>1</sup>	24.03.1998		Sweden	01.01.1997	
E 6	Belgium	07.08.1990		Belgium	01.01.1997	
E 7	Hungary	06.01.1991		Hungary	01.01.1997	
E 8	Czech Republic	10.08.1990		Czech Republic	01.01.1997	
E 9	Spain	23.07.1991		Spain	01.01.1997	
E 10	Serbia	27.04.1992		Serbia	01.01.1997	
E 11	United Kingdom	28.11.1989		United Kingdom	01.01.1997	
E 12	Austria <sup>1</sup>	24.03.1998		Austria	01.01.1997	
E 13	Luxembourg	12.05.1991		Luxembourg	01.01.1997	
E 14	Switzerland	02.02.1996		Switzerland	01.01.1997	
E 16	Norway	07.03.1999		Norway	01.01.1997	
E 17	Finland	29.12.1995		Finland	01.01.1997	
E 18	Denmark <sup>1</sup>	24.03.1998		Denmark	01.01.1997	
E 19	Romania	24.09.1994		Romania	01.01.1997	
E 20	Poland	13.11.1992		Poland	01.01.1997	
E 21	Portugal <sup>1</sup>	24.03.1998		Portugal	01.01.1997	
E 22	Russian Federation	08.04.1996		Russian Federation	01.01.1997	
E 23	Greece	03.12.1995		Greece	01.01.1997	
E 24	Ireland <sup>1</sup>	24.03.1998		Ireland <sup>1</sup>	24.03.1998	
E 25	Croatia	03.04.2001		Croatia	01.01.1997	
E 26	Slovenia	01.10.1994		Slovenia	01.01.1997	
E 27	Slovakia	10.08.1990		Slovakia	01.01.1997	
E 28	Belarus	02.07.1995	06 series suppl.8	Belarus	01.01.1997	01 series suppl.6
E 29	Estonia	28.12.1998		Estonia	01.01.1997	
E 30	Republic of Moldova	20.11.2016		Republic of Moldova	20.11.2016	
E 31	Bosnia and Herzegovina	06.03.1992		Bosnia and Herzegovina	01.01.1997	
E 32	Latvia	18.01.1999		Latvia	18.01.1999	
E 34	Bulgaria	21.01.2000		Bulgaria <sup>4</sup>	01.01.2007	
E 35	Kazakhstan			Kazakhstan	08.01.2011	
E 36	Lithuania	29.03.2002		Lithuania	29.03.2002	
E 37	Turkey	12.09.2003		Turkey	01.01.1997	
E 39	Azerbaijan			Azerbaijan	14.06.2002	
E 40	The Former Yugoslav Republic of Macedonia	19.08.2002		The Former Yugoslav Republic of Macedonia	01.01.1997	
E 42	European Union <sup>2</sup>	24.03.1998		European Union <sup>2</sup>	24.03.1998	
E 46	Ukraine	08.10.2002		Ukraine	22.03.2010	
E 49	Cyprus <sup>3</sup>	01.05.2004		Cyprus <sup>3</sup>	01.05.2004	
E 50	Malta <sup>3</sup>	01.05.2004		Malta <sup>3</sup>	01.05.2004	
E 52	Malaysia	04.04.2006		Malaysia	04.04.2006	
E 54	Albania	05.11.2011		Albania	05.11.2011	
E 56	Montenegro	03.06.2006		Montenegro	03.06.2006	
E 57	San Marino	26.01.2016		San Marino	26.01.2016	
E 58	Tunisia			Tunisia	01.01.2008	
E 60	Georgia	25.05.2015		Georgia	25.05.2015	
E 62	Egypt	03.02.2013		Egypt	03.02.2013	

EU Member
EFTA Member
Accept ECWVTA
Demand ECWVTA
CP 101 but not 83

Source: Bill Coleman

# Potential approaches to transposition

# Principle of Transposition

Three different approaches to transposition have been considered by the Task Force (see WLTP-20-04e and IWVTA-25-11 for details)

- Approach 1: Traditional approach to avoid “options”. Faithful to the 1958 Agreement.
  - **UN R.00 covers regional level 1a; UN R.01 covers regional level 1b; UN R.02 covers top level**
  - Pro: Fully in line with the new 1958 Agreement
  - Cons: Long lead in time (18 months) before all levels are in force + High administrative burden.
  - Solution(?): If Legal Office OLA were to accept simultaneous notification and entry into force
- Approach 2: ‘Untraditional approach’ - to speed up process
  - **UN R.00 covers all regional levels 1a, 1b; UN R.01 covers top level 2**
  - Pro: Shorter lead in time and reduced administrative burden compare to Approach 1.
  - Con: Could become complicated (potentially unworkable?) after rounds of amendments are made; also, the base version UN R.00 would contain options at choice of CPs
- Approach 3: ~~Untraditional approach using two sets of special provisions~~
  - **UN R.00 covers all levels (top level 2 as well as the regional levels 1a, 1b, ...)**
  - Pro: Shortest lead in time. Con: ~~against the spirit of the 58 Agreement.~~

## Approach - Way Forward

- Request to OLA prepared by the Task Force and the UNECE Secretariat.
- Request was discussed at WP.29 in March 2018 and to be sent to OLA in April 2018.
- Based on the level of detail of the information provided, OLA unable to provide a definitive response
- Further discussions required - Task Force / UNECE / OLA
- UNECE Secretariat's preferred approach remains as Approach 2
- Can GRPE provide guidance on this?

## Next steps

- Confirm the Approach to be used for transposition
- Confirm the process for introducing updated Durability into 1958 and 1998 agreements
- Confirm the process for introducing updated COP into 1958 and 1998 (?) agreements
- Confirm the 'way forward' for UNR 101
- Confirm how to handle RDE
- Finalise structures for UNR WLTP (Levels 1 & 2) and UNR 83 08 series
- Agree content of regional levels (Levels 1a and 1b) and Level 2
- Develop detailed regulatory texts
- Plan is to have an Informal UNR WLTP for 78<sup>th</sup> GRPE January 2019 and a Working Document for 79<sup>th</sup> GRPE June 2019.



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