

OICA COMMENTS ON DOCUMENT No. FQ-02-02 (IPIECA)

OICA welcomes the IPIECA proposal for parallel work-streams for technical specification and for implementation, and endorses the proposal of a key role for the UNEP PCFV in the implementation work-stream.

OICA recognises that market fuel specification is influenced by different factors in different countries and that developing countries will be the most challenged to implement the technical recommendations. However, it is these very countries where the issue of the relationship between fuel quality and emission performance is the most urgent, because the more developed countries are already addressing (or have already addressed) this issue.

OICA is not asking the UN to try to impose unrealistic market fuel specification on any country. All we seek are market fuels that are ‘fit for purpose’, that is, market fuels that match the necessary emissions control equipment and enable engines to function well. This necessary relationship between tailpipe emission requirements and function, on the one hand, and market fuel specification, on the other, has been recognised by all parties in WP29 and GRPE and by IPIECA as mentioned in their document No. FQ-02-02. It is, indeed the basis of the Worldwide Fuel Charter, which provides recommended fuel specifications for four different levels of market requirements.

OICA agrees with the need to avoid developing global specifications in a vacuum, and is ready to engage with all parties at global and at regional level where this is possible, necessary and likely to produce positive results. If harmonisation first at the regional level can be a useful step towards global harmonisation OICA is ready to support that, but it must be recognised that regional agreements also should not be developed in a vacuum, that global alignment of regional developments, to the extent possible, should always be a key factor, keeping in mind the longer term objective of complete global harmonisation.

Regarding the IPIECA suggestions for a starting point to the development of technical specifications, OICA is very disappointed at the low ambition demonstrated by the suggestion to consider “octane specifications and nomenclature”, “density and flashpoint” and other, un-named, parameters. OICA believes that certain key parameters, including but not limited to Sulphur content and metallic additives, deserve immediate attention, but ultimately, this group will be much more successful and make quicker progress if it considers all fuel properties collectively rather than trying to consider them one at a time.

OICA has already proposed to base specifications on those in the WWFC and, in informal document No. FQ-02-03 suggested that National or Regional standards (e.g. CEN or ASTM), which were developed by consensus among a variety of stakeholders, could represent a “lowest common denominator” specification that could help us make progress in this group.

OICA would like to hear specific counter-proposals where other experts find these suggestions unacceptable.