Proposal for an Amendment to "Proposal For A Charter For The Working Group On Off-Cycle Emissions" (43rd GRPE Informal Document No.6)

Transmitted by the representative of the Engine Manufacturers Association

Proposed Change

In the <u>Proposal For A Charter For the Working Group On Off-Cycle Emissions</u> document (the "Charter"), the following language is contained in the last sentence of the second paragraph:

"...With the advent of electronic controls, the possibility grows that many parameters of a particular test cycle may be recognized and engines adjusted for higher emissions outside of the test cycle."

EMA recommends the following amendment:

"...With the advent of electronic controls, the possibility grows that many parameters of a particular test cycle may be recognized and engines adjusted **outside of the test cycle, which may result in higher emissions**."

Rationale in support of this change

The language that is currently contained in the Charter can result in a conclusion that engine manufacturers modify engine parameters outside of the test cycle solely for the purpose of increasing emissions. This is not the case. Engine manufacturers may modify engine parameters outside of the test cycle for a number of reasons which may include engine/vehicle protection or for the purpose of responding to specific operating or ambient conditions.

EMA has previously submitted proposed definitions and accompanying rationale for consideration by the Off-Cycle Working Group. Those proposed definitions make it clear that manufacturers are interested in developing a GTR which addresses the concerns regulatory authorities have about the use of engine maps which may adjust the engine outside of the parameters of a particular test cycle, but at the same time want to ensure that the GTR provides manufacturers with some relief from the requirements under certain conditions which are necessary for the overall functionality of the engine and not necessarily for the purpose of increasing emissions.