Informal paper submitted to GRPE 81 by the Informal Working Group WLTP

Clarification of points regarding “UN Regulation WLTP”

GRPE 80 in January 2020 adopted the first two series of amendments for a new UN Regulation, here referred to as “UNR WLTP” as no number has yet been assigned.

The subject of vehicle emissions testing is based on diverse requirements worldwide and a variety of technologies. These are some of the points which makes testing procedures very complex, and Global Technical Regulation 15 (WLTP) made a first attempt to harmonise these requirements. Where harmonisation was not possible, the differences were documented as regional options.

The Transposition Task Force under the Informal Working Group WLTP has worked further to resolve these non-harmonised items, reaching harmonised compromises in some instances and agreeing on an approval process in others to the satisfaction of the leading Contracting Parties in this Task Force (Japan and the European Union).

This has resulted in UNR WLTP having features that have not been seen before in Regulations of the 1958 Agreement and GRPE therefore decided to commission this document to assist all users of this Regulation in their understanding.

During the adoption of this document by GRPE, OICA presented a paper describing the concerns of their members and proposing from their viewpoint a possible solution.

Option 1:
This OICA paper can be found appended to the guidance document starting with the title “< OICA concern >”

Option 2:
This OICA paper can be found on the WP.29 website as informal document GRPE-81-30

< key unique feature of UNR WLTP >

UNR WLTP will have 3 Levels. There are two regional Levels (contained within Level 1), and one harmonised Level (Level 2). The regional Levels reflect the current (at the time of adoption) emissions legislation in the EU (Level 1A) and in Japan (Level 1B). The harmonised level is the only level which will be accepted as part of an approval to Regulation 0 (International Whole Vehicle Type Approval – IWVTA).

As neither of these sub-levels of Level 1 will ever be subject to mutual recognition, it was decided to separate them from Level 2 by means of separate Series of Amendments (SoA). Therefore, Regulation WLTP in its original form will be published and will enter into force containing only Level 1A and Level 1B and a set of special provisions and transitional provisions prohibit issuing of approvals until SoA 01 (Level 2) enters into force. In other words, the mandatory mutual recognition of Levels 1A and 1B by Contracting Parties will not come into effect as they will belong to a previous version of the Regulation by the time that approvals may be issued.

SoA 01 will be published and will enter into force approximately 6 Months after the original version. This SoA will contain exclusively the Level 2 requirements giving clarity to Contracting Parties (CPs) that an approval to the original version is not subject to mutual recognition and an approval to SoA 01 is subject to mutual recognition. In other words, Contracting Parties will be required to issue and to accept approvals (in accordance with the rules of the 58 Agreement) to SoA 01 but are never required to accept approvals to the original version. Indeed if a Contracting Party wishes to accept approvals to the original version this should be proactively communicated to the Secretary General.
One aspect where Contracting Parties, and particularly their Type Approval Authorities will have to be attentive is the scope(s) of the new Regulation. Level 1A, Level 1B and Level 2 each have different scopes. This was necessary to ensure that neither Level 1B CPs (e.g. Japan) nor Level 1A CPs (e.g. the EU) were required to accept vehicles which were out of the scope of their regional emissions legislation for light duty vehicles, whilst including the maximum vehicle diversity possible in the interest of the industry.

< overview of main differences between the Levels of UNR WLTP >

<table>
<thead>
<tr>
<th>items</th>
<th>Level 1A</th>
<th>Level 1B</th>
<th>Level 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>the test driving cycle</td>
<td>all 4 phases</td>
<td>first 3 phases</td>
<td>all 4 phases, with results also evaluated for first 3 phases (however, OVC-HEVs (“plug-in” hybrid vehicles) need double testing as this is not possible).</td>
</tr>
<tr>
<td>the Bench Aging Test for durability</td>
<td>accept</td>
<td>do not accept (whole vehicle durability testing is required for diesel engined vehicles)</td>
<td></td>
</tr>
<tr>
<td>a mono-fuel gas vehicle having a petrol tank of up to 15 litres</td>
<td>exempt the testing with petrol</td>
<td>require separate testing with gas and petrol</td>
<td></td>
</tr>
<tr>
<td>OVC-FCHV s (“Plug-In” Fuel Cell vehicles)</td>
<td>within scope</td>
<td>exclude from the scope so not able to obtain Level 1B and Level 2 certificate</td>
<td></td>
</tr>
<tr>
<td>Compatibility with IWVTA</td>
<td>not compatible</td>
<td>compatible</td>
<td></td>
</tr>
</tbody>
</table>