

**IMMA Informal Document on noise of motorcycles (Regulation No. 41)**

1. Enlarged/additional information on manufacturer plate

IMMA remains convinced that an enlarged or additional manufacturer plate, as requested by a limited number of countries to resolve a predominantly national issue, is not the most cost-effective way to provide enforcement officers with the necessary roadside inspection information. However, IMMA has consistently been in favour of offering the regulatory community information necessary for the effective enforcement of motorcycle noise through roadside inspections. IMMA therefore would not oppose adding the additional information in section 6.1.1. c) of ECE/TRANS/WP.29/GRB/2009/3 on all class 3 motorcycles as either an enlarged or an additional label, until the already planned central UN/ECE type approval database has been put in place. IMMA invites all authorities to make optimum use of this information and consider enhancing enforcement programmes.

2. ISO 362-2 as new base type approval test

IMMA continues to support the introduction of the test procedure contained in ISO 362-2 as the new base type approval test method. IMMA remains convinced of the added value of this new ISO test method which was developed to remedy shortcomings of the current TA test, by stipulating more precise test conditions derived from in-use data and reflecting motorcycle operating capabilities (i.e. acceleration potential).

IMMA requests GRB members to acknowledge the de facto reduction in noise levels resulting from the “standstill” limits agreed by the R41WG.

Most recent comparative testing suggests that, of the population of class 3 motorcycles, more than 16% would be above the “standstill” limit of 78 dB previously determined by R41WG DEG. These “standstill” limits will have a significant impact on certain manufacturers due to varying model lineup and model specifications.

IMMA therefore rejects any consideration of limits that go beyond these “standstill” limits, which have been derived from an analysis of current, proper MC noise performance. Any further reduction beyond these limit values will result in increased tampering and illegal RESS.

IMMA recommends that GRB intensify its review and discussion of “standstill” limits with due recognition of any further test results and the 1 dB(A) correction factor that is part of today’s UN/ECE R41.

IMMA requests that the implementation of the ISO-derived test method with equivalent “standstill” limits as the new base type approval test is linked to the first stage (i.e. Euro 4) of the forthcoming two-stage EU exhaust emission regulation. IMMA also stresses the need to implement the proposed anti-tampering construction requirements for silencers and the prescriptions for manually-adjustable multi-mode exhaust systems in section 6.5. of ECE/TRANS/WP.29/GRB/2009/3 at the same time.

### 3. Additional Sound Emission Provisions

IMMA recognizes ASEP in concept and agrees with Germany on the need for continued development of ASEP. Recent ASEP testing confirms that the lower ASEP control area is the most difficult to regulate and would require individual manufacturers to make fundamental changes to their designs. It is IMMA’s belief that full ASEP control, if shown to be necessary, has to be linked to the Euro 5 emission stage and, at this point in time, IMMA cannot envisage going below a lower slope of 1, and upper slope of 5, an overall tolerance at the reference point of 3 dB(A) and a COP allowance of 1 dB(A).

In terms of the number of ASEP test points, IMMA proposes to use 2 fixed points (i.e. reference and upper) and 2 “mystery/optional” points within the prescribed ASEP control range.

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