Transposition of GTR15 (WLTP) into EU Legislation and UN Regulations

72nd GRPE January 2016

Submitted by the expert of the European Commission
Background

- New regulations are required in order to transpose GTR No. 15 (WLTP) into EU legislation and UN Regulations

- In the EU, ‘Regulation xxx/2016’ is being prepared as a new implementing and amending regulation of EC No. 715/2007, that will eventually replace EC Regulation No. 692/2008 (NEDC)

- Options for transposition into UN Regulation discussed at 69th, 70th and 71st GRPE. Routes for implementation considered at WP.29 in November 2015.
Transposition into EU legislation

- Regulation xxx/2016 is currently being prepared
- Annex XXI of the new regulation is based on GTR15. Amendments to the GTR include:
  - Supplemental Ambient Temperature Correction Test (14° C test)
  - Deletion of GTR options/elements not applicable in Europe (e.g. option to exclude extra-high phase; tests for additional pollutants)
  - European Utility Factors for OVC-HEVs
- How to report WLTP results in the European Type Approval Process to be finalised
  - Which values?; Where reported?; Where used?
- Aim to submit to Technical Committee - Motor Vehicles (TCMV) in March 2016.
Transposition into UN Regulations

- European Commission put forward two routes for consideration at WP.29 in November 2015
  - Route 1: UN Regulation on WLTP would fully reflect EU legislation
  - Route 2: UN Regulation on WLTP would be developed in a hierarchical manner

See Informal Document WP.29-167-20 and also the report for the WP.29 November 2015 session: ECE-TRANS-WP.29-1118, paragraphs 44-50

- 71st GRPE documents of relevance:
  - GRPE-71-02 - position of Japan on transposition into UN Regulation
  - GRPE-71-15 – position of Japan on transposition into Japanese legislation
  - GRPE-71-19 - European Commission ideas/proposals for transposition
Transposition into UN Regulations

• **Route 1:** UN Regulation on WLTP would fully reflect EU legislation
  - Non-EU contracting parties do not sign the WLTP Regulation but instead draft their own legislation, referring to parts of Regulation WLTP if/where appropriate
  - UN Regulation would be drafted so that individual parts could be easily referred to in national legislation

• **Route 2:** UN Regulation on WLTP would be developed in a hierarchical manner
  - Different levels of stringency
    - Top level – the most stringent requirements from across the regions
    - Regional levels with the region’s emission limits and region-specific technical and administrative requirements
  - Each Contracting party applying Regulation WLTP would have to accept the ‘top’ level and its own ‘regional’ level certificates and could issue certificates for all levels
Transposition into UN Regulations

- EC representative identified three advantages of Route 2
  - Would foster global harmonisation in the mid and long term
  - Certificates corresponding to regional levels could be issued by any contracting party
  - Would probably allow the inclusion of Regulation WLTP into International Whole Vehicle Type Approval (IWVTA), unlike Route 1.

- To counter this, it is more complex than Route 1 and also introduces a novel approach for GRPE. This needs to be taken into consideration when deciding on the way forward.

- The representatives from Japan and Switzerland expressed their support for Route 2.

- The representative from OICA also agreed in principle, taking into account the apparent compatibility of Route 2 with IWVTA
Transposition into UN Regulations

- WP.29 agreed to transpose the WLTP UN GTR into a UN Regulation according to Route 2.
- The chair of GRPE confirmed that GRPE would start work according to Route 2 at its January 2016 session
  - The complexity of following Route 2 was discussed
  - GRPE needs to start with the consideration for the scope and structure of Regulation WLTP
  - Once Regulation WLTP is included in Annex 4 to Regulation 0, only the highest level of stringency would be applicable for IWVTA – this needs careful consideration
Route 2 - to enable harmonisation

**New UN/ECE ‘Regulation WLTP’**

- **Regulation WLTP – top level (Level 2)**
  - Contains most stringent limits from across all regions
  - Subject to full mutual recognition: TA shall be accepted by all CPs

- **Regulation WLTP – Level 1a**
  - Contains current R.83 limits
  - Optional acceptance by other CPs

- **Regulation WLTP – Level 1b**
  - Contains “other” limits (e.g. Jpn)
  - Optional acceptance by other CPs

Use different Approval Marks and Numbering to distinguish approval level

Regulation 83 and Regulation 101 remain unchanged and ‘available’ for approvals

But pragmatic solution addressing testing options of the GTR 15 for level 2 needed
Potential solution to enable Europe & non-EU contracting parties to issue approvals against the 1958 Agreement

New ‘Regulation WLTP’

- Regulation WLTP Level 2
- Regulation WLTP Regional Level 1a
- Regulation WLTP Regional Level 1b
- Etc.

Type I test only

- EU would sign-up to both new regulations
- Non-EU contracting parties only need to sign-up to Reg. WLTP

New ‘Regulation 999’

‘Empty’ regulation with x.refs to equivalent parts of R.83*

- Type II test (Carbon monoxide emission test at idling speed)
- Type III test (Verifying emissions of crankcase gases)
- Type IV test (Evaporative emissions)
- Type V test (Durability of pollution control devices)
- Type VI test (Cold start at low ambient temperature)

Annex XI - OBD

* Where other tests refer to the Type I test (NEDC) it will be necessary to say (where appropriate) that this should be seen to be the WLTP Type 1 test (over a certain transition period in some cases)
Discussion on Scope and Structure of Regulation WLTP
Regulation WLTP

Table of Contents

1. Scope
2. Definitions
3. Application for approval
4. Approval
5. Specifications and tests
   - Different limits tables for each region
6. Modifications of the vehicle type
7. Extensions to type approvals
8. Conformity of production (COP)
9. In-service conformity
10. Penalties for non-conformity of production
11. Production definitively discontinued
12. Transitional provisions
13. Names and addresses of Technical Services responsible for conducting approval tests, and of Type Approval Authorities

Appendix 1 – Procedure for verifying the conformity of production requirements
Appendix 2 - Empty Appendix?
Appendix 3 - In-service conformity check
Appendix 4 - Statistical procedure for tailpipe emissions in-service conformity testing
Appendix 5 - Responsibilities for in-service conformity
Appendix 6 - Requirements for vehicles that use a reagent for the exhaust after-treatment system

Throughout the sections we will need to identify where there are regional variations.

Will need to agree from the start the terminology to use for each region so that it can be used in the tables, approval marks etc.
Regulation WLTP

Table of Contents (continued)

Annex 1: Engine and vehicle characteristics and information concerning the conduct of tests
   Appendix 1 - Information on test conditions
Annex 2: Communication
   Addendum to type approval communication
   No ... concerning the type approval of a vehicle with regard to exhaust emissions pursuant to Regulation WLTP, xx series of amendments
   Will enable distinction between the different levels of the regulation
Annex 3: Arrangements of the approval mark
   Will enable distinction between the different levels of the regulation
Annex 4: Type 1 test - WLTP gtr

Annex 5: Granting of an ECE type approval for a vehicle fuelled by LPG or NG/biomethane
   Appendix 1 - Bi-fuel gas vehicle - Calculation of LPG energy ratio
   Appendix 2 - Bi-fuel vehicle - Calculation of NG/biomethane energy ratio
Discussion on Scope and Structure of Regulation 999
Regulation 999

Regulation 999 Table of Contents

1. Scope
2. Definitions
3. Application for approval
4. Approval
5. Specifications and tests
6. Modifications of the vehicle type
7. Extensions to type approvals
8. Conformity of production (COP)
9. In-service conformity
10. Penalties for non-conformity of production
11. Production definitively discontinued
12. Transitional provisions – to include transitional provisions for the switch from NEDC to WLTP in relation to the Type IV test (Evap), Type V text (Durability), [Type VI test (-7°C)], Ki factors (for vehicles with periodically regenerating systems), and OBD.
13. Names and addresses of Technical Services responsible for conducting approval tests, and of Type Approval Authorities

Appendix 1 – Procedure for verifying the conformity of production requirements
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Appendix 6 - Requirements for vehicles that use a reagent for the exhaust after-treatment system
Regulation 999

Regulation 999 Table of Contents continued

Annex 1: Engine and vehicle characteristics and information concerning the conduct of tests
   Appendix 1 - Information on test conditions
Annex 2: Communication
   Addendum to type approval communication
   No ... concerning the type approval of a vehicle with regard to exhaust emissions pursuant to Regulation 999
   Appendix 1 - OBD – Related information
   Appendix 2 - Manufacturer's certificate of compliance with the OBD in-use performance requirements
Annex 3: Arrangements of the approval mark
Annex 4: Empty Annex
Annex 5: Type 2 test - Cross-reference to Regulation 83
Annex 6: Type 3 test - Cross-reference to Regulation 83
Annex 7: Type 4 test - Cross-reference to Regulation 83
Annex 8: Type 5 test - Cross-reference to Regulation 83
Annex 9: Type 6 test - Cross-reference to Regulation 83
Annex 10: Empty Annex
Annex 11: On-Board Diagnostics (OBD) for motor vehicles - Cross-reference to Regulation 83
Regulation 999 – principle for annexes

Annexes are ‘empty’ of technical content.

Examples

**Annex 4: Type II [or 2] test (Carbon monoxide emission test at idling speed)**
1. The general requirements for the Type II [or 2] test shall be those specified in Annex 5 to Regulation No. 83 in force at the time of the approval of the vehicle, with the exception set out in paragraph 2.
2. Reference to the Type I test in paragraph 2.2.1. of Annex 5 to Regulation No. 83 shall be understood as referring to the Type 1 test in Regulation No. WLTP.

**Annex 5: Type III [or 3] test: (Verifying emissions of crankcase gases)**
1. The general provisions for the Type III [or 3] test shall be those specified in Annex 6 to Regulation No. 83 in force at the time of the approval of the vehicle, with the exception set out in paragraph 2.
2. Reference to the Type I test in paragraph 2.1. of Annex 6 to Regulation No. 83 shall be understood as referring to the Type 1 test in Regulation No. WLTP.
Way forward

• Aim to agree scope and structure at 72\textsuperscript{nd} GRPE

• A complex task
  • GRPE to provide mandate to WLTP Informal Working Group to develop detail?
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