

Transmitted by the expert from IMMA

Informal document GRB-56-08
(56th GRB, 3-5 September 2012,
agenda item 2)

**Draft IMMA position regarding ECE/TRANS/WP.29/GRB/2012/5:
*Proposal for Supplement 1 to the 04 series of amendments to Regulation No. 41, as submitted by the expert from the Russian Federation.***

IMMA welcomes the proposal to improve R41 (04) and looks forward to discuss it further with the Russian Federation. As raised by Netherlands at 55/GRB, IMMA too has concerns about the need to change the current use of the terminologies of “sound” and “noise”; these words cannot be simultaneously interchanged or current terms “exhaust and silencing systems” cannot be changed without having consequences on the other PTW noise regulations (R 9, R63 and R92) and also relevant gas emissions regulations

We note that the proposal is not limited to what is mentioned in the introduction on page 1 of the proposal. Apart from editorial changes (“noise” and “sound”) and a revised structure there is several other proposed changes of which the impact needs to be further considered.

We therefore express a general reservation to the document as a whole and put forward following questions and remarks as a basis for discussion:

- R41 (04) has just been published and the industry has not had the opportunity to apply the current amendments without the need for further amendments. Are the proposals based on practical problems?
 - The current wording, “Silencing system”, basically covers the same as the proposed change “Noise reduction system”. We don’t see a need to change the current wording.
 - Consequences of changing ‘Noise’ into ‘Sound’ need to be further considered and would imply consequent application, including for all vehicle categories. This would affect the recent introduction of ‘ASEP’ were it to be changed to “noise” (‘ANEP’).
 - ‘Catalyst’ is proposed to be added to the definition of component of the silencing system, and proposed to be added in the information document. This would imply that whenever a new catalyst is developed for use in the systems, the manufacturer would have to apply for an extension of type approval as the catalyst was no longer the one listed in the information document.
 - We note that by introduction of the term “noise reduction system” it refers to all types of noise and is not specific for the use in this regulation as clearly stated by the use of “exhaust and silencing systems”; we fear the scope has been inadvertently been widened.
 - Whilst revising the structure of R41 to be similar to R51 may be a way forward but we consider it unnecessary as currently the type approval authorities have not raised any issues concerning the structure and it is this structure they currently use and utilize.
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