

Informal paper submitted to GRPE 81 by the experts from OICA complementing the informal paper from the IWG WLTP (GRPE-81-29) titled:

Clarification of points regarding “UN Regulation WLTP”

OICA fully supports both the concept and the content of the above mentioned informal paper. To reflect the specific views and concerns of the vehicle industry however, we would request insertion of the following text at the end of the document:

< OICA concern >

These differences create a concern within the vehicle industry that misunderstandings due to this complexity could lead to unplanned changes in the effective stringency of the WLTP legislation, particularly in Contracting Parties which are not heavily involved in the Informal Working Group WLTP activity.

< Example of possible concern >

The concern is that for simplicity or due to its link to IWVTA, a country may decide to accept exclusively Level 2 approvals, despite having previously been satisfied with an approval reflecting the requirements of just one of the Level 1 Contracting Parties. This could lead to undesired consequences as illustrated in the following example:

Vehicle: OVC-HEV (“Plug-In” Hybrid Electric Vehicle)

Intended Markets: EU or Japan + a non-EU-non-Japan Contracting Party which previously accepted UNR 83 (vehicle not intended for sale in both the EU and Japan)

Situation: As described above, there are elements of Level 2 which require separately demonstrating compliance with the requirements of Level 1A and Level 1B. The double testing burden for Level 2 has to be accepted in the interest of harmonisation of the entire Regulation until a solution can be found.

Solution: In addition to the acceptance of Level 2 approvals, OICA encourages Contracting Parties to accept those Level 1 approvals which ensure the necessary environmental protection and deliver the desired customer information in the context of their market conditions.