Proposals and Considerations
for the regulation of Non-Exhaust (Brake) Emissions.
Preamble

- European friction industry agrees fully to regulate Non-Exhaust (Brake) Emissions.
- Components emitting Non-Exhaust-Emissions are by definition sacrificial parts.
- Components subject to tear & wear are considered parts without intended release of substances, as they protect the rest of the system in its safety function.
What should Non-Exhaust Emissions regulation look like?

• Non-Exhaust Emissions regulation should be a stand-alone regulation (Only maintaining links to type-approval regulations of affected components.)

• Taking into account all Non-Exhaust Emissions from a vehicle corner perspective

• Considering emissions of
  • Brake linings
  • Brake discs or drums
  • Tires
  • Road abrasion

• Emissions shall be measured by relative limits or by a reference system.
What should Non-Exhaust Emissions regulation take into account?

• Non-Exhaust Emissions regulation shall be assigned to
  • environmental regulatory test parameters,
  • all vehicle categories

• The regulation will conflict with all current type-approval regulations as they are designed to be safety, performance and compliance (CoP) oriented.

• Real-driving emissions must first be put in relation to laboratory tests to establish a meaningful baseline for the development of Non-Exhaust Emission components.

• The current emission values shall serve as a reference basis.
What should Non-Exhaust Emissions regulation take into account?

• PM or PN levels shall not be used as the only factors in determining Non-Exhaust Emissions.

• Whether there is a different toxicity level for different components is “not proven” or “not yet fully researched”.
Thank you very much for your attention