Preliminary Comments by India on

- EPPR -04-06 Evaporative procedure
- EPPR -05-08 Draft for GTR 2 amendment

For the web conference on 20th Dec 2013

Background

- "Draft procedure Doc. No. EPPR-04-06e was being submitted by EU in 4th meeting of UN EPPR held in Pune.
- "Subsequently the following documents are also available
 - . EPPR-05-08 (Replacing EPPR 04-06)
 - . EPPR-05-05
- " India has carried out preliminary study EPPR 04-06
- India expects to finish the detailed study and submit comments by 15th Jan 2014 (This will about 4 weeks before EPPR 06-meeting).
- " The following are general observations.

EPPR-04-06

Ageing of evaporative components (1/2)

Observation 1

Fixed DF of 0.3 g/test is included in EU test procedure which is to be added to SHED test results. Optionally results can be established by ageing evaporative emission components.

However as given in CARB procedure, road test is not included in this document.

Comments

India would request experts for EU to provide:

- Reason for choosing aging as the method of aging procedure and not the road running
- . any study done to workout equivalency between road test and ageing procedure.

Evaporative emission class

Observation 2

EU procedure has prescribed Evaporative emission classes as A, B and C with corresponding test procedures. Decision is on the contracting party to choose any test

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CLASS	Type of test
A	Fuel storage permeability test
В	Fuel storage and supply system permeation test
С	SHED test, short diurnal and hot soak tests

Comments

- " Class C test shall be made mandatory for S3-3 (L3 for ECE R) vehicles as:-
- Category S3-3 is populous category in India.
- SHED is also being now adopted by most contracting parties.
- Mandating SHED test will help in adopting a applying a harmonized procedure for all contracting parties for S3-3 category..
- The formulation of this item may need rephrasing, to be in line with format used in GTR-2, as principal norm and alternative norms.

Fuelling system tightness

Observation 3

In general requirements clause it is given that "The fuelling system tightness shall comply with the requirements referred to in ISO xx.xx:yyyy"

Also in introduction it is given that there is a SAE standard J2973 but it is under progress.

Comments

Request:

- " A copy of the present daft may be circulated to EPPR members
- " Update on progress of the standard.

General

Observation 4

- "Scope includes test for petrol system in the bi-fuel system
- India has a system of limp-mode bi-fuel system, where the emission requirements in petrol mode, if the petrol tank capacity is less 2 litres.

Comments

India will be presenting a detailed note in time for EPPR 06 session

EPPR-05-08

- India will be submitting detailed comments by 15th Jan 2014.
- "But India will like to point out that:
- The final decision on the structure is to be taken, i.e. whether Durability test to be
 - . part of GTR 2 or
 - . A separate GTR.
- "India will be providing the technical comments on the durability test also, so that:
- " If two separate documents are agreed upon, the technical matter will be ready by then.