

OICA Comments to Working Paper ECE/TRANS/WP.29/GRPE/2023/04 (Proposed GTR on Brakes Emissions)

IWG PMP – January 2023



OICA Comments to GRPE/2023/04

- OICA fully support the need of a robust testing procedure to address the emissions of particles from brakes.
- Regenerative braking (enabled by vehicle electrification) is an extremely efficient way to dramatically reduce friction brake emissions.
- OICA believes that development of a methodology to take into account the actual performance of regenerative braking is achievable in a few months and would be compatible with adoption of an amendment to the existing working document in June 2023.



OICA Comments to GRPE/2023/04

- OICA asks GRPE to consider that the entire proposed GTR with all elements will only be published at UNECE around 10 days before the planned adoption. The measurement procedure for all electrified vehicles, e.g. the non-friction braking chapter was presented in TF-4 only recently without agreement, and only submitted to the PMP group a few days ago (14.12.2022).
- Additionally, fundamental OICA input has not been considered. It is only promised to be included in the first update/revision to the GTR, after adoption and without any planned timing.



OICA Comments to GRPE/2023/04

- OICA has supplied data which demonstrates that the friction energy share of electrified vehicles varies within each electrification concept (e.g. PEV, OVC-HEV etc.) by a factor of up to 4
- Inclusion of a procedure that fairly accounts the benefit of regenerative braking in the original version of the GTR is a key for industry to get certainty, prioritise investments and enable supply of the necessary technologies to markets transposing the GTR.



OICA Comments to GRPE/2023/04

- The family building concept has been presented for the first time in PMP on Dec 13th, with no possibility of proper evaluation. The determination of emissions at vehicle level is entirely open, with no global harmonisation
- OICA has proposed a procedure for electrified vehicles. This is viewed positively by the PMP group, however only considered for the next update to the GTR.
- Further points which have not been addressed:
 - Bedding procedure to be reviewed
 - Wheel Load/Disk Mass concept to be reviewed
 - LCVs update
 - Round Robin for PM, and PN is needed after the full GTR has been adopted and all revisions have been implemented



OICA Comments to GRPE/2023/04

- OICA has raised all of these issues, for example at the PMP Meeting on Sept 22nd and by OICA letter to PMP Chairman on Oct 18th.
- OICA therefore does not support submission of the GTR proposal by PMP in its current version to GRPE 87 for adoption.
- OICA proposes to move the adoption of the GTR to the GRPE 88 meeting in June 2023, thus enabling adoption of a complete and robust piece of legislation