

# ***Japan' position and proposal on draft of OBD-gtr***

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- The proposal of Japan for EPPR-08-13e

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Japan proposes the amendments to EPPR-08-13e as follows.

## **<Common issue throughout the text of EPPR-08-13e>**

### **1. We understand that the items for future discussion are in the square brackets.**

**Having reviewed the text with this assumption, Japan propose to add square brackets for these items below.**

- [GTR No.2] : We have not finished the discussion.
- [three wheel], [ four wheel],[OVC],[NOVC],[CI] : these should be discussed in later stage.
- [Test Type V] : This has not been discussed yet.

### **2. The description of category**

**Japan proposes to follow the description of S.R.1 (as in the other GTRs)**

### **3. Items subject to the selection by each CPs**

The current text lacks consistency because the test requirements are prescribed based on the MI activation criteria, although we agreed not to define the MI activation requirements and to leave it to the decision by each CP. The text needs to be modified in order to be consistent with this idea.

### **4. Article B.4.**

Japan has already made proposal in EPPR-07-16e(OBD\_JPN administrative.xls), and is waiting for the reaction from EC.

## <Individual issues>

### Article A.1 Introduction

#### Reason:

The objective of OBD is environmental protection.

#### Amendment: Delete the text in red.

The industry producing two-, three- and four-wheeled light motor vehicles is a global one, with companies selling their products in many different countries. The Contracting Parties to the 1998 Agreement have determined that work should be undertaken to address the environmental performance requirements from two- and three-wheeled light motor vehicles as a way to help improve air quality internationally. The aim of this Global Technical Regulation (GTR) is to provide measures to strengthen the world-harmonisation of light motor vehicle [certification] / [approval] and certification legislation, in order to improve the cost effectiveness of environmental performance testing, remove trade barriers, reduce the overall complexity of global legislation, remove potential areas of conflict or opposing requirements, improve the air quality ~~and accessibility to diagnostic information.~~ Although the main goal of on-board diagnostics (OBD) in light duty legislation today is to act as enhanced environmental protection feature, ~~its potential benefits go beyond that: With this new light motor vehicle legislation, OBD can also facilitate effective and efficient repair and maintenance and may also provide improvements of functional safety in the future.~~ This GTR establishes harmonised functional requirements for OBD and a procedure to test the environmental OBD functions (test type VIII). The functional requirements and test procedures were developed so that they would be:

## Article B.1 TEXT OF THE REGULATION, GENERAL PART

### Paragraph 1.1

#### **Reason:**

The objective of OBD is environmental protection.

#### **Amendment: Delete the text of the first sentence in red.**

On -board diagnostics ('OBD') is essential for aspects such as environmental protection ~~as well as for effective and efficient repair and maintenance of vehicles.~~

### Paragraph 3.7

#### **Reason:**

The word "emission" was deleted from the first sentence without reason. The objective of OBD is environmental protection, so it is more reasonable to keep the word "emission" in this sentence.

#### **Amendment: Restore the word "emission", which was deleted from the original text.**

"emission control system" means the electronic engine management controller and...

## **Article B.2** TEXT OF THE REGULATION, FUNCTIONAL ON-BOARD DIAGNOSTICS (OBD) Paragraph 3.5.

### **Reason:**

This paragraph is not suitable for GTR because the content is regarding the mutual recognition.

### **Amendment: Delete this paragraph.**

~~The authority shall notify all other Contracting Parties of its decision on granting a deficiency request.~~

## Paragraph 5.

### **Reason:**

This paragraph is not suitable for GTR because the content is regarding the mutual recognition. It is more appropriate to describe the items, not the template.

### **Amendment: Amend the phrase “template laid down” to “item for example”.**

The vehicle manufacturer shall fill out the information document in accordance with the ~~template laid down~~ item for example in section B.4. [and submit it to the [certification] / [approval] authority].

**Article B.2.2.** Annex: minimum monitoring requirements for an on-board diagnostic (OBD) system stage UN I

**Reason:**

E/M threshold and torque reduction has been deleted from “scope and monitoring Requirements” in Paragraph 2. Therefore, the paragraphs 2.5.1. and 2.5.2. regarding exemption are no longer necessary.

06-14e Paragraph 2.

If fitted, the following listed sensors and actuators shall be monitored for electric circuit malfunctions which may cause emissions to exceed the designated OBD emission thresholds laid down to in point 4 of section B or lead to activation of a default mode that results in a significant reduction of propulsion unit torque.

08-13e Paragraph 2.

If fitted, the following listed sensors and actuators shall be monitored for electric circuit malfunctions.

**Amendment: Delete these paragraphs.**

~~2.5.1. a listed malfunction will not cause emissions to exceed the designated OBD emission thresholds if this OBD failure threshold is applied as MI activation performance criterion by a Contracting Party; or~~

~~2.5.2. a listed malfunction will not cause a significant torque loss if applied as OBD performance criterion by a Contracting Party; or~~

## Article B.3 TEXT OF THE REGULATION, TEST TYPE VIII, OPTIONAL ENVIRONMENTAL ON-BOARD DIAGNOSTIC TEST

### Paragraph 1.1.

#### **Reason:**

The objective of OBD is environmental protection.

“Torque fail” is not suitable terminology for OBD for the purpose of environmental protection.

**Amendment :** Amend the phrase “torque fail threshold “ to “other failure” .

This Annex describes the procedure for type VIII testing, environmental on-board diagnostics (OBD), which a Contracting Party may require for the [certification] / [approval] of a vehicle complying with the UN stage I requirements. Test type VIII environmental verification testing is optional and application of OBD emission and ~~torque fail thresholds~~ other failure are at the discretion of the Contracting Party. The procedure describes methods for checking the function of the OBD system on the vehicle by simulating failure of emission-relevant components in the powertrain management system and emission-control system.

## Article B.3 TEXT OF THE REGULATION, TEST TYPE VIII, OPTIONAL ENVIRONMENTAL ON-BOARD DIAGNOSTIC TEST

### Paragraph 8.3.4.

#### **Reason:**

The objectives of OBD is environmental protection.

“torque” and “powertrain” are not suitable terminology for OBD for the purpose of environmental protection.

#### **Amendment : Read the text as follows;**

If a Contracting Party applies MI activation ~~performance criteria~~ any ~~powertrain~~ malfunction ~~that triggers any operating mode which significantly reduces engine torque~~, it shall be detected and reported by the ~~powertrain~~ / engine control system.

### Paragraph 8.4.1.6

#### **Reason:**

Description of “torque reduction” is not necessary OBD for the purpose of environmental protection.

#### **Amendment : Delete the text in red.**

Electrical disconnection of any other emission-related powertrain component connected to a powertrain control unit / engine control unit / drive train control unit ~~that results in emissions exceeding any of the OBD emission thresholds or triggers an operation mode with significantly reduced torque as compared with normal operation, if the Contracting Party applies these fail thresholds as MI activation performance criteria.~~