

Japanese opinion for (EPPR-11-07) the proposal  
from India  
on EVAP GTR

5 Jun 2015

# Japanese opinion for the proposal from India on EVAP GTR

## I. Proposal No.14

Definition of the hierarchy for the different fuel

The Contracting Parties shall accept test reports for the approval of a vehicle according to the test fuel used given in Table – B.3.#

<i>Test fuel mandated by the Contracting Party</i>	<i>Compliance to type IV test using</i>
<i>E10</i>	<i>E10</i>
<i>E5</i>	<i>E5/E10</i>
<i>E0</i>	<i>E10/E5/E0</i>

*Table – B.3.# Hierarchy of acceptance of test reports with different test fuel blends.*

## Japanese opinion

We cannot agree on this proposal. Even if the E0 fuel is applied, the fuel property varies by each country fuel, so it is difficult to prescribe hierarchy while the superiority and inferiority for the evaporative emission test is not proved. We think that it should be assumed as the future issue.

For your information, the fuels in each country are specified and the hierarchy of fuel property is not considered for the tailpipe emission of four wheeled vehicle (WLTP-gtr) .

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## II. Application to the three wheeled vehicles

### -1. Proposal No.2, 11 , 12 , 26 , 35

“[ ]” for three wheeled vehicles is deleted in the Scope and the text.

### -2. Proposal No.33 , 40

The volume of three wheeled vehicles is defined as 0.25m<sup>3</sup>.

### -3. Proposal No.20

The text is added about chassis dynamo for three wheeled vehicles.

## Japanese opinion

It is agreed to give priority to L1 and L3 vehicles, and we have not discussed on three wheeled vehicles so far, so “[ ]” should be kept for the descriptions for three wheeled vehicles at present.

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## III. Proposal No.45

The family classification criteria for the fuel storage volume is revised as below.

the fuel storage ~~volume~~ *capacity declared by the manufacturer* ;is within a range of ~~+/- 50%~~ - +10%/-50% the nominal volume

## Japanese opinion

Although we appreciate the Indian support to the Japanese proposal, the proposal above allows the fuel storage which is not verified the conformity to the requirements as proposed in the document “EPPR-11-04 e”. It is not appropriate to allow the tolerance of “( + )” for the volume of fuel storage.

## Tolerance of fuel storage volume

EPPR-11-04e

[background]

the technical data to support the Japanese comment at 10<sup>th</sup> EPPR IWG on the tolerance of fuel storage

**Japan position: It is appropriate to allow only the smaller fuel storages as fuel storage family for the evaporative emission regulation.**

### JUSTIFICATION

- There is a large correlation between the volume of fuel storage and of evaporative emission. It is obvious that evaporative emission increases as the fuel storage becomes larger.
- Therefore, it is impossible to judge whether a larger fuel storage meets the requirements without another evaporative emission test.

- ◆ The graph below shows the correlation b/w the volume of fuel storage and of the evaporative emission when tested under CARB test method without canister. (n=16)

### The correlation between the fuel storage volume and evaporative emission

