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Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

Industrial Transformation and Advanced Value Chains
Automotive and Mobility Industries

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Position of European Commission Representative on the issue of VIAQ

Submitted to 2nd VIAQ meeting, Paris 3-4 November 2015

The European Commission welcomes the work performed within the GRPE IWG on Vehicle Interior Air Quality and the opportunity to develop a recommendation on this issue. Since we will not be present at the 2nd meeting, we decided to state our opinion in writing.

We believe that the recommendation should be based on the relevant ISO standard (ISO 12219-1), for the development of which many participants to the IWG have contributed. The ISO standard reflects all modes necessary for simulating the various phases, it is shorter than other proposed cycles and is already a recognised international standard. We believe that only if the group has strong arguments that the ISO standard is missing some elements, there would be a case for recommending something different.

On the various technical elements our position is found below:

Since the current knowledge shows that the emission of the substances under question lowers significantly within a first month after production, we recommend that the tests should only refer to production vehicles of around a month of age and less than 50 km driven. The test should be part of the Conformity of Production and not the Type Approval phase, when the final product is usually not available. In case of non-compliance, the test could be performed with more vehicles (up to a maximum number of vehicles, to be defined). A definition of vehicle families should be made, with the test performed with expected worst case within the family.

Finally, definition of limit values should not be the objective of technical regulations within this group, and should be left at the individual countries to define in other fora.

Panagiota Dilara