

India Comments on EPPR-13-09e

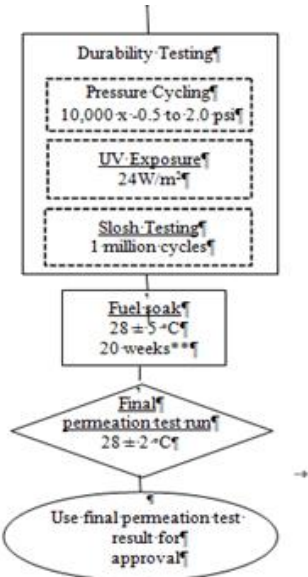
ECE/TRANS/WP.29/GRPE/2016/0X

Proposal for a new Global technical regulation on the measurement procedure for two- or three-wheeled motor vehicles equipped with a combustion engine with regard to the crankcase and evaporative emissions

India comments and marked in ~~double strikethrough~~ and **this font**.

No	Reference Para	India comments	Justification
[I. Statement of technical rationale and justification			
1	Section D, Item 3, Running para 19, 2 nd Para	<p>"With regard to a three-wheeled vehicle of category 3-4 or 3-5, Contracting Parties agree that at a minimum the following criteria should be taken into account for vehicle classification:</p> <p>(a) in their straight-ahead condition, motor vehicles having two wheels which are placed on the same straight line and equipped with one sidecar; or,</p> <p>(b) motor vehicles having a saddle-type seat, a handle-bar type steering system and three wheels, on which the side of the driver's seat is of open structure; or,</p> <p>(c) motor vehicles complying with the following criteria:</p> <p>(i) three wheels; and</p> <p>(ii) in which the arrangement of the wheels is symmetric with respect to the longitudinal centreline of the vehicle; and</p> <p>(iii) the distance between the lines passing through the centres of the ground-contact sections of the outermost wheels on the axle on the same line is less more than 460 mm; and</p> <p>(iv) constructed to turn with part or all of the wheels and vehicle body inclined. "</p>	<p>In para (c) (iii) reference is taken from "twinned wheel" definition covered in EU directive 2002/24/EC. Twinned wheel shall be considered as 'one wheel' if the distance between the centres of their areas of contact with the ground being less than 460 mm.</p> <p>Hence, while defining three-wheeled vehicle of category 3-5, 'separate wheels' condition shall be valid if this distance is more than 460mm.</p>

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No	Reference Para	India comments	Justification
II. Text of the global technical regulation			
2.	2.	<p>Note under the Table 1 - Scope with regard to the propulsion unit and fuel type: may be modified as:</p> <p>* Type IV test is not applicable for a vehicle in the scope of this UN gr that is designed primarily for permanent running on LPG or NG / bio-methane or hydrogen, having a petrol system, with a petrol fuel tank capacity not exceeding two litres in the case of two- and three- wheeled vehicles of category 3 two-wheeled motorcycle and a motorcycle with side car and not exceeding three litres in the case of a 3-2 and 3-5 category three-wheeled vehicles, intended for emergency purposes or starting only.</p>	India propose to use generic terms for two- and three wheeled vehicles instead of referring to specific category e.g. 3-2, 3-5 as it was decided earlier which was also proposed by EC.
3	Annex 2 Figure A2/1	<p>Figure A2/1 may be corrected by removing ¶ marks in the following block of this figure</p>  <pre> graph TD A[Durability Testing¶] --- B[Pressure Cycling¶ 10,000 x -0.5 to 2.0 psi¶] B --- C[UV Exposure¶ 24W/m²¶] C --- D[Slosh Testing¶ 1 million cycles¶] D --- E[Fuel soak¶ 28 ± 5 °C¶ 20 weeks**¶] E --- F{Final¶ permeation test run¶ 28 ± 2 °C¶} F --- G([Use final permeation test result for¶ approval¶]) </pre>	Editorial

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II. Text of the global technical regulation			
4	Annex 3	<p>4.2.2.1. in Annex 5 of UN gtr No 2 as appropriate for the class of vehicle in the scope of UN gtr No 2; New EC Proposal</p> <p>[4.2.2.2.] alternatively to 4.2.2.1 for three-wheeled vehicles in the scope of this UN gtr at the choice of the Contracting Party the applicable Type I test set out in the national regulation of the Contracting Party under the following conditions:</p> <p>[4.2.2.2.1.] the oil temperature of the In order to ensure engine reaching its warm operational temperature and a condition with a total minimum accumulated test-type I test time of 780s after start. In case the prescribed Type I test time is less than 780 s, the running shall be continued till at least 780 s is reached.</p> <p>or</p> <p>[4.2.2.2.2.] for an air-cooled engine operated on a mixture of petrol and lubrication oil the sparkplug seat temperature having reached its warm operational temperature and a total accumulated test-type I time of 780s after start.</p> <p>[4.2.2.2.2.] By means of exemption, a base two-wheeled motorcycle equipped with a sidecar may be approved based on the type IV evaporative emission test results of the base two-wheeled motorcycle.</p>	<p>Proposal from EC is acceptable, however India feels that, the engine warm up condition can be achieved by vehicle run on Type I test cycle for 780s or more. Indian type I test time is 1080 seconds. In this context India suggest to keep ‘minimum’ limit of 780s for vehicle run in order to ensure engine warm up condition and hence no separate monitoring is necessary for oil temperature or spark plug seat temperatures.</p> <p>With the above explanation, clause [4.2.2.2.2] become redundant.</p>
5	Annex 6	<p>3.1. In the case of evaporative emission class (es B and) C, the details are given in Table A6/1.</p> <p>[3.2 In the case of evaporative emission class B, the details given at serial no. 2.1, 2.1.4, 2.1.5 and 2.1.6 of Table A6/1.]</p>	<p>India feels that, separate reference of acceptance criteria is required for class B and Class C tests since not all criteria for Class C test is applicable for Class B test. (e.g. canister criteria of Class C test is not applicable for Class B test). Hence, para 3.2 for Class B test may be retained.</p>

Thank you