Transposal of WLTP (GTR15) into 58 Agreement
Preliminary considerations: the complexity

1. **GTR15 will be transposed into 58 Agreement. Current WP29 mandate to GRPE is to develop new UN R to include WLTP, along the line of "Route 2" (hierarchical concept)**

2. **GTR15 currently lacks harmonisation, with different incompatible regional levels**
   - Complete transposal of GTR15, with all regional levels/modules, into a single UN R is very complex

3. **EC proposes, using "Route 2, development of Top Level 2, with regional levels as "sub-levels" 1a, 1b, ...**

4. **Intention is that EU would "apply" this new UN R (grant and accept approvals to Level 2, with "Level 1a" as minimum requirement in alternative to its own "EU-WLTP": EU would impose Level 1a, but also accept Level 2**

5. **Problems of this approach:**
   - Full mutual international recognition only on basis of Level 2 ➔ only Level 2 can be included in U-IWVTA
   - Definition of Level 2 expected to be very complex and time-consuming
   - Level 2 expected to be totally artificial ➔ unnecessary technical complexity
   - No mutual recognition among the regional levels/modules ➔ Contrary to 58A spirit
   - Approval to UN R, but on basis of a regional level/module, can be included in L-IWVTA only!
   - Different approval markings for each of the regional levels/modules
   - Etc.

6. **WP29/IG-IWVTA (see WP29-169-11, page 12) also recognised complexity and suggested reconsideration of GRPE mandate and of hierarchical concept**
   ➔ Conclusion 1: Transposal of current, full GTR15 into 58 Agreement under current WP29 mandate ("Route 2") will be a long, complex and possibly unmanageable process
Preliminary considerations: the EU legislation and timing constraints

1. EU has already included (laboratory testing), WLTP test cycle (EU version) as from September 17 for new types in EU legislation (EC regulation XXX/2016)

2. EU wants to ensure that OEMs cannot bypass EU legislation through approval to UN R83.07 (current NEDC test cycle)
   - EU might have to withdraw from UN R83 (and UN R101) as from September 2017
   - UN R83 and R101 approvals would not be granted in EU countries anymore, while these will most likely still be needed in many other non-EU countries, for quite some time

3. EU has no plans at this stage to introduce RDE - Real Driving Emissions (road testing) in UNECE

 Conclusion 2: EU withdrawal from UN R83 (and R 101) would create huge problems for industry
   - Need to find a way such that EU can still apply UN R 83/R 101: solution must be in place < September 2017

 Conclusion 3: Due to complexity of full GTR15 transposition (see Conclusion 1), date of September 2017 most likely cannot be met
   - Need to develop pragmatic stepwise approach before full GTR15 can be transposed into 58 Agreement
Interim solution pending development of UN WLTP regulation:

1. Introduce transitional provisions in UN R83 and R101:
   
   - CPs applying WLTP (GTR 15), e.g. EU, can refuse UN R83/R101 approvals granted on the basis of test cycles other than WLTP as of September 2017
     - EU can remain signatory to UN R83 and R101 and grant approvals (i.e. for export outside EU)
     - EU can however refuse in its own territory such UN R83 and R101 approvals

2. Proposed transitional provisions (supplements to UN R83/R101) expected to be adopted by WP29 in March 2017, subject to endorsement of GRPE in January 2017

Conclusion 4: Above solution "buys time" to find good solution and is therefore supported by OICA

- Is however not in line with principles of mutual recognition of approvals
- Is only interim solution and should therefore not be open ended
1. See above: GTR15 in its current form is not sufficiently harmonised to be transposed fully into 58 Agreement

2. More time will be needed to find a completely common approach, addressing all regional levels, while there is an urgency to address the EU situation

3. The WP29 solution of June 2016 buys some time, but cannot be a long term one

4. Need to ensure continuity of UN Regulation(s), including a transposition of “EU-WLTP”, until an U-IWVTA compatible solution is found, e.g.:
   - CPs currently applying UN R83
   - Other countries that currently have national legislation based on UN R83
   - Other countries that currently accept UN R83 type approvals

   ➤ Otherwise, risk of fragmentation into 2 different sets of requirements

➤ Possible solution: amend the mandate to GRPE to work in 2 steps (see next slides for details)

  ➤ Step 1 (short/medium term): transpose EU emission legislation into future UN R83.08

  ➤ Step 2 (medium/long term): Develop concept to accommodate different levels/stringencies in various Contracting Parties under Rev. 3 to the 58 Agreement

  ➤ Goal: allow inclusion of WLTP emission requirements into IWVTA
Details of the possible solution – Step 1

Step 1: Copy and paste EU legislation XXX/2016 into UN R83.08

- Same approach as was used till now

- EU can continue to apply UN R83:
  - Only accept UN R83.08 approvals
  - Deliver UN R83 approvals to previous versions (07, 06, …) for export to non-EU countries as needed, unless these countries also require/accept 08 approvals

- Is in line with WP29 (June 2016) concept of transitional provisions expected to be inserted in UN R83.07 (see also UN R22, §15.1.5): EU can refuse approvals not granted on basis of UN R83.08

- Relatively "easy" and straightforward short/medium term solution

- Would in fact transpose only part of GTR15 into 58 Agreement, until this transposition can be expanded in Step 2

- Main drawbacks:
  - Japan (+ possibly others) will still not apply UN R83
  - UN R83 cannot yet be included in U-IWVTA, as is the case today
Step 2: Develop concept to accommodate different levels/stringencies in various Contracting Parties under Rev. 3 to the 58 Agreement:

- Evaluate potential of a maximum of countries to apply or at least accept Step 2 (as was done for transition from UN R15 to UN R83)

- Ensure mutual recognition of approvals

- Goal is to allow inclusion of Step 2 into IWVTA
Conclusion

Proposed approach is to revise mandate to GRPE and to transpose WLTP stepwise:

<table>
<thead>
<tr>
<th>Step 0 (interim step)</th>
<th>What?</th>
<th>Purpose?</th>
<th>Remark</th>
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</thead>
<tbody>
<tr>
<td>Develop &quot;transitional provisions&quot; in UN R83.07</td>
<td>To allow EU to remain &quot;applying&quot; UN R83 (continue to grant UN R83 approvals)</td>
<td>UN R83 approvals based on NEDC (up to R83.07) not accepted in EU anymore!!!</td>
<td></td>
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<tr>
<td>Step 1</td>
<td>Transpose EU legislation XXX/2016 into UN R83.08 (and UN R101?)</td>
<td>To allow EU to remain fully applying UN R83 (grant and accept approvals)</td>
<td>➔ Clarify in scope/title that RDE is not included ➔ EU can continue granting R83 approvals (any version), but EU would accept R83.08 only</td>
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<tr>
<td>Step 2</td>
<td>Full implementation of GTR 15 into UN 58A</td>
<td>To allow WLTP inclusion in U-IWVTA and accommodate maximum of countries</td>
<td>Need to define process: develop new UN R or continue in UN R83 framework?</td>
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