



Transposition of GTR15 (WLTP) into UN Regulations

Update from WLTP Transposition Task Force

January 2018

Background

Transpose GTR15 WLTP into a new 'UNR WLTP' regulation

- Level 2 to contain most stringent requirements from across all regions
 - Subject to full mutual recognition: TA shall be accepted by all CPs
- Regional levels (Level 1a, 1b etc.) to contain regional requirements
 - Optional acceptance by other CPs
- New UNR WLTP to only include elements developed and agreed by WLTP IWG (i.e. would not include the EU ATCT test)
- UNR WLTP to be 'accompanied by' a UNR83 08 series that covers all the requirements of UNR83 07 series not covered by new UNR WLTP (e.g. OBD, Low temperature test etc.)
 - Introduce at same time as UNR WLTP
 - As and when GTR15 and UNR WLTP add new tests (e.g. Durability) 'UNR 83 08 series' will 'shrink' in content.
 - Would enable EU to remain as a Contracting Party to UNR No. 83
 - EU would be a CP to UNR No. 83 and UNR WLTP. Japan would be a CP to just UNR WLTP

Principle of Transposition

Summary of three different approaches considered by Task Force (see WLTP-20-04e and IWVTA-25-11 for details)

- Approach 1: Traditional approach to avoid “options”. Faithful to the 1958 Agreement.
 - **UN R.00 covers regional level 1a; UN R.01 covers regional level 1b; UN R.02 covers top level**
 - Amendments to regional levels through either supplements or series of amendments
 - Pro: Fully in line with the new 1958 Agreement
 - Cons: Long lead in time (18 months) before all levels are in force + High administrative burden.
 - Solution(?): If Legal Office OLA were to accept simultaneous notification and entry into force
- Approach 2: ‘Untraditional approach’ - to speed up process
 - **UN R.00 covers all regional levels 1a, 1b; UN R.01 covers top level 2**
 - Amendments to regional levels through either supplements or series of amendments
 - Pro: Shorter lead in time and reduced administrative burden compare to Approach 1.
 - Con: Could become complicated (unworkable?) after rounds of amendments are made; also, the base version UN R.00 would contain options at choice of CPs
- Approach 3: Untraditional approach using two sets of special provisions
 - **UN R.00 covers all levels (top level 2 as well as the regional levels 1a, 1b, ...)**
 - Pro: Shortest lead in time. Con: against the spirit of the 58 Agreement.

Approach 1 timing issue - example

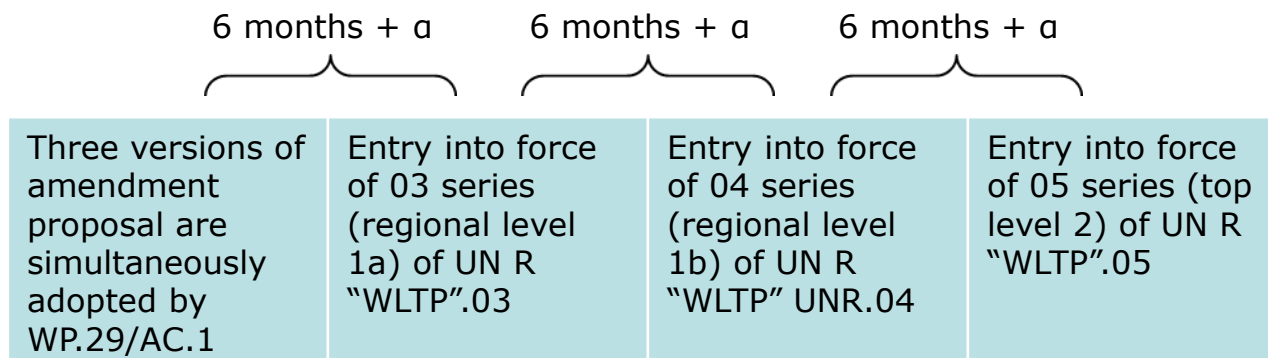
Where:

UN R "WLTP" 00 series (regional level 1a for EU)

UN R "WLTP" 01 series (regional level 1b for Japan)

UN R "WLTP" 02 series (top level 2)

In the case that requirements for both regional levels 1a and 1b are strengthened, it will take 18 months + 3a* to amend UN R "WLTP" consisting of three consecutive versions.



* "a" represents an administrative period of time - which will be shorter under Rev.3 of the 1958 Agreement than under Rev.2.

IWVTA #25 – November 2017

The three different approaches were presented to IWVTA #25 to seek guidance on the best approach to use (IWVTA-25-11).

- All 3 approaches were presented but it was made clear that the Transposition Task Force did not consider Approach 3 to be an acceptable approach to take further.
 - IWVTA #25 agreed with this conclusion
- The UNECE secretariat were doubtful that OLA would agree to a shortening of the timescales – needed to overcome the 18 month lead in time issue for Approach 1.
- Given the longer timescales and the additional administrative burden of Approach 1 compared to Approach 2, the UNECE secretariat recommended that Approach 2 should be followed initially (with the appropriate Introductory Provisions) – with the option to switch to Approach 1 if necessary should Approach 2 become too complex and too difficult from an administrative point of view.
- The IWVTA #25 did not provide a recommendation as to whether Approach 1 or Approach 2 would be preferred.

Next steps

- Make a request to OLA to accept simultaneous notification and entry into force of the three levels under Approach 1
 - Separate document to be presented to GRPE asking for WP.29 to make this request to OLA (a draft is included as Appendix 1 to this report)
- Confirm Principle for Transposition (i.e. Approach 1 or 2)
- Finalise structures for UNR WLTP (Levels 1 & 2) and UNR 83 08 series
- Agree details for stringency levels (e.g. ref. fuels, etc.)
 - Diesel ref. fuel study underway. Petrol Ref. fuel study to commence Spring 2018.
- Develop detailed regulatory texts
- Update on progress to be provided at IWG#22 Ispra
- Plan to have Informal UNR WLTP for 78th GRPE January 2019
- Plan to have Working Document for 79th GRPE June 2019.



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