**EPPR-22-21 r1**

**IMMA comments on GTR2 revision**

**following Nov 2017 EPPR telco**

**Test room and soak room Temperature**

In para.  4.2.4.5. about pre-conditioning, para. 6.1.1 about test room temperature, India has proposed a temperature of 23 °C, in order to align EPPR with WLTP.

Referring to Japan and IMMA request to India to submit technical justification and need of test condition change at previous EPPR meetings, the any technical justification or explanatory data has not been introduced.

In order to find a constructive solution forward, IMMA would like to note the following.

**The principle of a general ‘alignment to WLTP’ has originally been agreed with the aim to avoid different wording definition between cars and motorcycles, but ‘using the same test procedure and test condition’ has not been part of such discussion and in EPPR.**

The test temperature of 23 degrees in WLTP has been decided without technical justification. Firstly, WLTP proposed to change to 14 deg. considering cold temperature regions and cold condition. However, 23 degrees, which is 2 deg. below the original temperature, was agreed as a result of ‘DISCUSSION’ among WLTP members, i.e. a political agreement.

Since 23 deg. has obviously no technical justification and logical necessity even in cars, it is deemed illogical to apply such temperature also for motorcycles.

IMMA believes there is no need to emphasize that, as a basic principle, any change or new proposal shall be accompanied by technical justification and clarification of necessity.

We cannot continue discussion without any solid justification of the above proposal.

It is supposed that some TA authority may use the same test facility for motorcycles and for cars, which may lead cost reduction or saving time in that TA facility.

However, motorcycle manufacturers do not use the same facility as cars, therefore test condition alignment is not needed and this would increase cost and require investment of renewal facilities. That cost would be added to the vehicle price.

As it can be easily understood, test facilities of manufacturers are in much greater number than facilities of approval authorities and, in general, type approval facility has better accuracy for temperature and humidity control. IMMA believes that, if TA authority want to use same facilities between motorcycles and cars, those facilities should be under control, in order to satisfy requirement of both cars and motorcycles.

Furthermore, it shall be noted that another general principle agreed by EPPR IWG, was to align GTR2 Revision with EURO5. If test condition is changed to 23 degrees, the alignment and harmonization would get lost. This must be avoided also from the point of view of seeking global harmonization.

**Test room humidity control requirement**

IMMA has checked EU regulation document 134/2014 again, however no requirement of humidity control was found in 134/2014. It is a misunderstanding noting that EU regulation has any humidity control requirement.

Manufacturers measure and report the test room humidity to use it for NOx calculation, as currently specified in GTR2, EU, Indian and Japanese regulations.

As noted above, there is no need to align with WLTP for this issue.

If India request to add the humidity control requirement to the current regulation, then India is requested to provide technical justification.

**OPEN/CLOSED system**

Current GTR2 draft reads: ‘An open system may be used instead [of a closed-type system] if it is confirmed that all the exhaust gases are collected.’

This text means that a manufacturer should show the data that all the emission gas is collected at every type approval test to the TA authority.

Therefore, discussing a specific case now makes no sense for deciding on GTR2 text above.

IMMA has shown a specific sample of data for both open and closed system, as an example supporting the current GTR2 draft text and therefore use of open type system.

Latest European regulation also contains the same text, which reads ‘An open system may be used instead if it is confirmed that all the exhaust gases are collected.’

On the basis of the provided data, IMMA propose to conclude this discussion and to align GTR2 revision with Euro 5..

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