**Japanese positions for the IEPPR activities**

Transmitted by the expert from Japan

**1. Draft Terms of reference (L-EPPR01-02)**

Japan would like to amend 2(c) as proposed by UK delegation (Inf.doc.GRPE-64-26) at last GRPE as follows;

*“c) work both on Regulation under the 1958 and* ***in particular*** *1998 Agreements, bearing in mind…”*

**2. Scope of work—first priority on L3 category with combustion engines**

While European Commission proposes to include all L category vehicles as the scope of work in this group, Japan proposes to set the first priority on L3, which has larger market and greater environmental influences.

We assume that it would be difficult task enough to update the regulations for L3 category by 2016, and it is important to put priority on the tasks.

As for L6 and L7 categories in particular, we have serious concerns to regulate these “four-wheeled vehicles” along with motorcycles and tricycles. We take it necessary to research the situations in each Contracting Party and to consider in detail how the regulations for these categories (L6 and L7) should be.

In Japan, the vehicles of L6 and L7 categories are considered as four-wheeled vehicles, and the emission requirements for these vehicles are the same with those for M1 and N1 vehicles.

Concerning the EV and HEV, we propose to discuss them based on the outcome from the EVE (Electric Vehicles and the Environment) and WLTP (Worldwide Harmonized Light Vehicles Test Procedures) informal groups, which means lower the priority for these vehicles at this moment. Currently the overall discussion of electric energy consumption, electric range determination and such are considered in EVE and WLTP and it is desirable to take advantage of their results.

We do not understand what “Test type not attributed” in WP29-158-15, Para.9 VI means. If this implies low temperature test, we propose to delete this part since there is no need for worldwide harmonization for low temperature test.

**3. Reference Fuel**

Japan proposes to unify the reference fuel when developing the regulations because the limit values vary depending on the reference fuels.

**4. Timeline**

We understand the final target for L3 vehicles is to revise the UN Reg. No.40, however, we propose to update the UNgtr No.2 prior to UN Reg.No.40. The content of updated gtr No.2 shall be transposed into UN Reg.No.40.

\*\*\*\*\*