

PORSTI-RONNBERG Satu (ENTR)

From: mo@acea.be on behalf of ih@acea.be
Sent: 14 December 2012 17:48
To: JEAN Philippe (ENTR)
Cc: STEININGER Nikolaus (ENTR); pg@acea.be
Subject: Real Driving Emissions (RDE)
Attachments: letter Ph Jean.pdf

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Brussels, 14 December 2012

Mr Philippe Jean
Head of Unit
DG ENTR
European Commission
1049 Brussels

Subject: Real Driving Emissions (RDE)

Dear Philippe,

As you know, ACEA is actively and constructively participating in the RDE working group that your unit is coordinating. RDE will be a massively important and significant part of the future emission regulation.

Irrespective of the RDE test method, the test boundary conditions and the RDE evaluation protocols remain the key issues that need to be resolved soon. Once the boundary conditions are fixed, then the applicability of a certain RDE test method and its evaluation protocols will be better known.

Concerning the question of the RDE test method – the main concern of ACEA for the RDE test method was that ‘normal driving’ must be properly taken into consideration during the on-going developments proposed by JRC or Technical University Graz. The key motivation of the random cycle test was to define ‘normal driving’ from a pool of short trips.

However, ACEA recognises that in the view of the Commission and a number of member states, not all encountered driving conditions can be reproduced by the random cycle approach (i.e. road gradient and altitude). Additionally, they do not consider the random cycle approach as a sufficient measure concerning the use of defeat devices and therefore it does not address one of the three main regulatory targets of RDE.

As such, it appears that the result of a random cycle test under RDE would not be accepted by legislators as being equivalent to PEMS and that, in case of any different results between a PEMS and random cycle test, any decision on regulatory compliance would only be based on the result of the PEMS test.

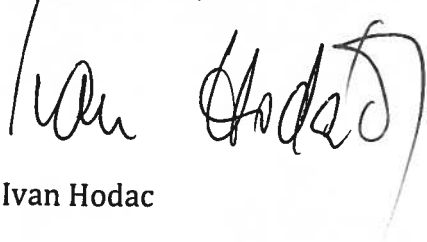
Therefore, the random cycle test offers no legal certainty that a result will be accepted as being equivalent to PEMS - which makes the random cycle test inappropriate for compliance demonstration in any future surveillance program conducted by member states.

As noted above, there still are many open points (e.g. the test boundary conditions, definition of normal driving, definition of emissions g/kWh, g/kg etc.) that will continue to require substantial joint effort from all parties to solve. In the planned timetable, working out a complete random cycle test procedure and evaluation protocol and assessing the equivalence of the random cycle and PEMS test methods appears to be not feasible.

Since the random cycle approach will not be considered as equivalent to PEMS for regulatory compliance, it is therefore irrational to continue to spend time and considerable resources developing both test procedures.

Therefore, ACEA will now stop all activities on the random cycle test and will not support this approach during the on-going RDE discussions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ivan Hodac', with a stylized flourish at the end.

Ivan Hodac

Copy: Mr Nikolaus Steininger, DG ENTR / B4