

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@acea.be>  
**Sent:** 22 September 2016 15:00  
**To:** [REDACTED] (GROW); [REDACTED]  
(GROW)  
**Subject:** Further questions on impact of RDE error in WLTP Regulation  
**Attachments:** 160922 note to DG GROW on impact analysis.pdf

22 September 2016

Dear [REDACTED]

[REDACTED] had a couple of questions on the impact analysis but I would like to ensure these points are clear for you as well:

**(1) Number of respondents to the 3 questions (diesel RDE, gasoline RDE including early PN-PEMS) and EVAPS:**

***Example - concerning diesel RDE:***

- (a) Box 1 on the first page has ramp up possibility at Sept 2018 = 28.5% with full ramp-up planned for Sept 2019 = 93.5%. Number of respondents = 2.
- (b) Box 2 has accelerated ramp-up possibility 12 months earlier from Sept 2018 = 31% with full ramp up still only effective from Sept 2019. Number of respondents = 2.
- (c) Box 3 has average production loss from 12 months earlier from Sept 2018 = 40.5% with production loss at Sept 2019 = 7%. Number of respondents = 4.

This means that 2 members replied with data for (a), the same 2 members replied with data for (b) therefore allowing a calculation of impact for (c). An additional 2 members replied with data that could then answer (c) directly – the total allowing a calculation of average impact in (c) therefore being 4 respondents.

Please note however, that other three other manufacturers provided input in units lost rather than in percentage lost. These are not included in the percentage indicated in Box 3 but are noted in footnote (2).

Total respondents to diesel RDE Impact is therefore 7 (4 × percentage and 3 × units) and the subsequent calculation into total units was based on those OEM 2015 production figures as shown on the other sheet Same approach for gasoline & same approach for EVAP.

**(2) Pre-certification before Sept 2017 and whether that was factored into the impact answers?**

I was asked if OEM's were looking at pre-certifying to WLTP before September 2017.

The answer of course is yes, they are considering that, but the possibility is not factored into the impact answers. The possibility to do that was already low but it is now becoming less and less, so there is now way to know if that possibility really exists or it is just 'theoretical'.

However, OEM's are **absolutely desperate** to be able to continue to sell compliant vehicles. But now we hear:

- WLTP has even more delays than initially foreseen (i.e. translations by November, scrutiny starting in December (? with Christmas holiday season) - meaning that WLTP adoption might be around March/April 2017 (at the earliest?) and then subsequently published in the Official Journal.
- We assume the DG CLIMA Regulations that refer to the legal WLTP Regulation and define the procedures to determine the official CO2 values for a vehicle CoC will be adopted by the Commission around the same time and subsequently published in the Official Journal.
- Then the member states are expected to start work and implement. Aside from the fact that a huge approval workload is coming on WLTP and RDE, we already hear that certain major

approval authorities could provide a WLTP system approval when the WLTP Regulation and DG CLIMA Regulations would be published, but they will not issue a vehicle CoC because they won't be able to adapt their CoC systems in time. Later in 2017 is what we hear. Of course, other authorities might be faster but we don't know yet.

- Also, the hands of the approval authorities appear tied behind their backs due to the unfortunate political climate. Practical working methods will not suffice.
- Irrespective of on-going work with DG CLIMA on customer labelling (from the CoC), ACEA would recommend COM (DG GROW and DG CLIMA) start to consider what will be happening in the run-up to September 2017 and to help smooth that process as much as possible.

### **(3) Gasoline Direct Injection:**

The data provided for the impact on gasoline includes the impact if RDE was advanced by 12 months and if PN-PEMS would be from Sept 2017/Sept 2018.

In the main, that affects the GDI technology but manufacturers have also confirmed that some traditional gasoline models with engines planned for renewal between Sept 2017-Sept 2019 will also be affected by the advancement of RDE by 12 months.

The numbers provided combined both those issues – I do not have data to break that down further.

### **(4) Gasoline Direct Injection statistics:**

I have market data that I cannot share from IHS that covers engine production and engine installation for automakers. However, the data is not specific to the EU sales of GDI vehicles.

I would suggest you contact IHS directly.