



## AECC POSITION ON COMMISSION PROPOSAL ON A NEW TYPE-APPROVAL FRAMEWORK

AECC welcomes the proposal for a Regulation on the approval and market surveillance of motor vehicles COM(2016)31 that was adopted by the European Commission on 27 January 2016. This draft Regulation offers an excellent opportunity to establish a sound and ambitious emissions legislative framework for future vehicles and to re-establish and ensure the credibility of European vehicles emissions legislation.

The future Regulation will increase the quality and independence of vehicle testing and will enhance market surveillance provisions. Together with the already adopted legislation on Real-Driving Emissions (RDE packages 1 & 2), the new test procedure for light-duty vehicle emissions testing (WLTP) as well as with the further planned work on the 3<sup>rd</sup> and 4<sup>th</sup> packages of RDE, the new Regulation will form a consistent package to ensure that vehicles in use will deliver clean emissions under all driving conditions.

AECC members are companies that are developing, producing and selling key catalytic emissions control systems that are integrated in the complete engine and vehicle system. These companies are suppliers within the European automotive industry supply chain. From their position in the supply chain they are not directly involved in the European vehicle Type-Approval process. Nevertheless, emissions control technologies play a crucial role in the vehicle manufacturers' strategies to meet the regulatory requirements. Based on the knowledge and experience on vehicle emissions control, AECC feels it is appropriate to make some general comments in the light of the revision of the Type-Approval Framework Regulation.

Even though legislative requirements are considered relatively robust for original equipment, concerns on **quality, performance and durability of replacement components** remain. In particular, durability requirements are lacking for replacement pollution control systems for cars and, as a consequence, low-quality and non-durable replacement products can be placed on the EU aftermarket.

Emissions compliance to the type-approval standard should also be guaranteed after replacement of a component that is critical for the vehicle's emissions such as catalytic emissions control devices, filters, sensors, etc.

The 5<sup>th</sup> comitology package of the heavy-duty Euro VI regulation that was adopted in TCMV on 15 March 2016 provides a good example of how durability requirements for replacement components could materialise (see Annex XI to Regulation (EU) No 582/2011). A similar initiative would be needed for passenger cars that ensures emissions from vehicles equipped with aftermarket emissions control systems are controlled not only on the regulatory test cycle, be it NEDC or the future WLTP, but also under the Real-Driving Emissions (RDE) test procedure.

It is also of vital importance, both for air quality reasons but also for the credibility of EU emissions legislation that the overall **market surveillance** system improves in the EU. The European Commission's intention to develop a 4<sup>th</sup> RDE regulatory package on in-service conformity testing has to be considered in parallel to the on-going revision of the type-approval legal framework. In that context, to ensure third-party testing plays a role in market surveillance, vehicle data such as road load settings need to be made available to the public in a transparent manner, as is the case in the US for instance.



Emissions control technologies are designed for each type-approved vehicle to ensure it meets the regulatory emissions limits at the end of its useful life. However, **removing, tampering and tuning measures** of the emissions control technologies on the vehicle are being offered to vehicle owners by independent companies, often through on-line websites.

There is a growing body of evidence<sup>1</sup> of commercial offers to remove Diesel Particulate Filter (DPF) or to circumvent the power-derating inducement systems implemented on vehicles equipped with Selective Catalytic Reduction (SCR) systems to ensure the proper injection of ammonia precursor (AdBlue<sup>®</sup>) in the deNOx catalyst.

With the aim to identify the heavy-polluting vehicles on the market, AECC believes that **Periodic Technical Inspection** (PTI) of vehicles should be enhanced to ensure that the emissions measurement techniques that are used during the environmental check are able to cope with the low levels of PM/PN and NOx emissions from modern vehicles (such as Euro 5, 6, Euro VI,...). In 2009 Deutsche Umwelthilfe (DUH) asked<sup>2</sup> the German transport Minister to ensure an effective periodic inspection including tailpipe exhaust measurements. Such activities have now been initiated in France for instance where a Decree<sup>3</sup> of 17 June 2016 introduces more stringent air pollutant emissions tests during vehicle periodic technical inspection as of 1 January 2019.

Finally, AECC welcomes the Commission proposal to replace the existing Directive that requires transposition into the different EU national legislations by a European Regulation directly applicable in all EU Member States. This will ensure a level-playing field with regard to legislation interpretation by the Member States' type-approval authorities.

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Should you need more information, you can contact AECC at [info@aecc.eu](mailto:info@aecc.eu).

#### References:

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*AECC is an international non-profit scientific association of European companies engaged in the development, production and testing of catalyst and filter based technologies for vehicle and engine emissions control. This includes the research, development, testing and manufacture of autocatalysts, substrates and speciality materials incorporated into the catalytic converter and filter and catalyst-based technologies to control engine emissions. Members' technology is incorporated in the exhaust emission control systems on new cars, commercial vehicles, buses, non-road mobile machinery and motorcycles in Europe. More information on AECC can be found at [www.aecc.eu](http://www.aecc.eu).*

*AECC's members are: BASF Catalysts Germany GmbH, Germany; Ividen Europe B.V. Stuttgart Branch, Germany; Johnson Matthey PLC, United Kingdom; NGK Europe GmbH, Germany; Solvay, France; and Umicore AG & Co. KG, Germany.*

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