

**INDIA'S COMMENTS ON PROPOSAL VIDE DOCUMENTS  
GRPE-57-03 AND ECE/TRANS/WP.29/GRPE/2009/4**

- 1 India appreciates the document ECE/TRANS/WP.29/GRPE/2009/4, which details all the concerns which need to be addressed to while working out Limit values for motorcycles with the WMT cycles.
- 2 India's concerns, have been amply described in para 3.5 of the document, reproduced below for ready reference:

*In India, consideration for introducing WMTC as alternative to existing Indian regulation is under discussion. According to the 1998 Agreement, article 4, section 4.2., it is stated, that "A global technical regulation may specify alternative non-global levels of stringency or performance, and appropriate test procedures, where needed to facilitate the regulatory activities of certain countries, in particular developing countries". It seems that operating conditions vary from one country to another while some countries focus on commuting and fuel efficiency to provide an economical mode of transport for daily needs, others focus on high acceleration and power (nature of sportive vehicles). Addressing these differing target segments results in a wide variation in engine and drive train design parameters which in turn results in different levels of pollutant emissions under different driving conditions.*

- 3 India also appreciates the IMMA proposal, vide document GRPE-57-03, to have two sets of limit values, to cater to the two different requirements. The methodology prescribed in proposed para 5.2 addresses the main concerns of India namely:-
  - a) Class 2-1 motorcycles may be tested with the driving cycles prescribed for Class 1 motorcycles and
  - b) A combined limit for HC and NOx may be prescribed instead of individual limits for HC and NOx separately.
- 4 The methodology described by IMMA in proposed para 5.1 takes into account that the type of condition which exists in regions such as India may not be suitable to operating conditions and regional priorities of some of the contracting parties of 1998 agreement.
- 5 IMMA has also established that providing such alternative in GTR is permissible under article 4.2 of the 1998 agreement.
- 6 However, India cannot accept the suggestion by IMMA that the proposal prescribed in para 5.1 is the global requirement. Conditions prescribed in para 5.2 is not a regional specific need for India, but is applicable to regions which give priority for control on fuel economy or CO2 emission.

Therefore, India proposes that the emission norms should be specified with two alternative approaches, one Table, which can be adopted by regions following the European practice, and the other for regions for whom the control of fuel economy and CO2 emission is of importance. Articles 7.2 and 4.2 of 1998 agreement permit prescription of different set of norms in a GTR.
7. India also appreciates that for the purpose of Harmonization, it is desirable that one of the alternatives must be accepted by all contracting parties, with the Contracting party having the option to choose the second one, if it desires so. This is possible where it is generally certain that vehicle complying with one set of alternate complies with the requirements of other but not necessarily vice versa.

In view of the above, in order to take care of all possible situations, two sets of limit values may be incorporated in GTR 2. Indian authority is not in favour of country specific limit values and in the GTR, these alternatives shall not be distinguished as global or non-global.
- 8 Hence, India suggests that GRPE may initiate work on working out mutually acceptable limits values based on principle of two sets of limit values.