

1 November 2015

Re: Proposal for amendments to the Consolidated Resolution on the Construction of Vehicles (R.E.3) **ECE/TRANS/WP.29/2015/111** - (AECC, CLEPA, EUROMOT, OICA) and Informal document GRPE -71, para 62 based on ECE/TRANS/WP29/GRPE/2015/9

Dear Mr Chairman,

At the GRPE meeting in June, Dr Hamje expressed the views of both Concawe and IPIECA that we do not agree with the proposed changes to Annex 4 of the above document. At that meeting a last minute change was made to the proposal to limit the proposal only to the '58 agreement. This did not give sufficient time to consult with Concawe and IPIECA colleagues before a decision was taken to move the proposal to WP.29. The minutes of the GRPE meeting say that the decision was endorsed but no vote was taken and the minutes do not reflect the discussion that it was necessary to have further discussions/modifications before it would be acceptable to the fuel industry.

Since the GRPE meeting Concawe and IPIECA have had extensive discussions including with other stakeholders and as a result we conclude that whether the changes apply to the '58 agreement or both '58 and '98 agreements we cannot agree to them for the same reasons that we communicated to GRPE originally which are:

- 1) The stated purpose of the current Annex 4 and the proposed amendment is to: "inform governments about the appropriate market fuel quality that is protective of vehicle emission control technologies." In our opinion, the current Annex 4 is sufficient to provide information on those fuel properties, such as sulphur, lead, ash and total contamination that have been implicated in irreversible changes in some types of vehicle emission control technologies. The proposed amended Annex 4 is unnecessary because it goes far beyond and includes fuel properties which are not related to the proper functioning or durability of vehicles or vehicle after-treatment systems.
- 2) R.E.3 has the purpose of providing Global Guidelines for the Construction of Vehicles, not fuels. We believe that an annex in this document is not the appropriate place to include detailed information which relates to fuel specifications. A forum specifically devoted to fuels issues would be a more appropriate venue, such as the United Nations Partnership for Clean Fuels and Vehicles (in UNEP).

- 3) Globally, vehicle fleets vary widely depending on economic, societal, and other factors. Similarly, refined fuels vary in composition depending on their crude source and the capabilities of the refineries and infrastructure that supply the local market. Local fuel specifications should be consistent with local health and air quality priorities and changes in these specifications should be appropriate to the vehicles that are sold in that market.

Transportation fuels should be reliable and affordable to meet consumer needs consistent with vehicle manufacturers' recommendations as found in the vehicle owner's manual. Regulations should also be based on sound science and adopt a systems approach, addressing vehicle, fuel and infrastructure issues. Similarly, appropriate cost/benefit analysis should clearly demonstrate that benefits to society exceed costs.

It is not appropriate to recommend European type fuel specifications without consideration for the vehicle needs and the capability of the local fuel production / supply infrastructure. Doing so could lead to divergence of local fuel specifications and adversely impact consumers, vehicle manufacturers, fuel suppliers, and national governments.

Furthermore, discussions with stakeholders have suggested that inclusion of this wording would make it less likely for developing countries to sign up to either agreement. We request that the proposal is withdrawn from the WP.29 agenda and that this letter be presented as an informal document to make delegates aware of the situation with regards to this proposal.

Anticipating due consideration of this request,

Yours faithfully,

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