

A Dutch draft discussion proposal of WNTe Compliance Statement from.

Looking at:

1. the Position Paper “basis for an engine or vehicle manufacturer’s WNTe Compliance Statement from May 2, 2005” last page with the acceptable means to proceed and
2. the existing ECE Regulation 13H annex 18 (Harmonised braking regulation with an annex on complex electronic vehicle control systems)

I have tried to make a more general wording without specific US-EPA language like “attest, good faith and good engineering judgment”

I add the language from R13 and add “emission control strategy (ECS)” from our directive to include multi-setting engines into this statement.

*Text Position Paper:*

*"(Name of manufacturer) attests that the engines within this engine family complies with the applicable WNTe emission limits when operating under all conditions which may reasonably be encountered in normal vehicle operation and use, and which are subject to the requirements of the WNTe regulation. (Name of manufacturer) makes this statement in good faith, after having performed an appropriate engineering evaluation of the engines emissions performance over a wide range of operating and ambient conditions of all the information relied upon as the basis for this statement.*

*Text Annex 18 Regulation 13:*

*3.4. Safety concept of the manufacturer*

*3.4.1. The manufacturer shall provide a statement which affirms that the strategy chosen to achieve "The System" objectives will not, under non-fault conditions, prejudice the safe operation of systems which are subject to the prescriptions of this Regulation.*

*Draft proposal for discussion within the EU:*

**A) The manufacturer shall provide a statement which affirms that** the engines **and the engines control strategies (ECS)** within this engine family complies with the applicable WNTe emission limits when operating under all conditions which may reasonably be encountered in normal vehicle operation and use, and which are subject to the requirements of the WNTe regulation. **The manufacturer shall make** this statement **on the basis** of the engines emissions performance over a wide range of operating and ambient conditions.

B) The basis for the WNTe Compliance Statement shall be determined by the engine or vehicle manufacturer, and **shall** rely on data, engineering analysis, and other information sufficient for the manufacturer to have the confidence necessary to ensure compliance with the WNTe portions of the OCE gtr are met. As an example, the basis for the Compliance Statement could include WHTC data, WHSC data **or data from laboratory testing** (e.g., an emissions map of similar resolution to the engine’s base fuel injection timing map) under the conditions covered by the WNTe. Data generated from in-use highway vehicle testing could also be part of this combination, or depending upon the extent of the in-use

data, it could be the primary basis for the Compliance Statement.