

CLEPA Statement
Real Driving Emissions – Light-Duty Vehicles (RDE-LDV) – 4th regulatory package

Executive Summary

- Automotive suppliers welcome the completion of the RDE test requirements as a milestone in EU emission legislation
- Technology is available on the market to meet RDE requirements not only at type approval but also in-service
- Consideration of bigger emission test result spread is vital
- Use existing best-practice and have third party testing checked by type-approval authority

Real Driving Emission requirements for in-use testing complete EU emission legislation

The 4th regulatory RDE package is expected to complete the RDE test on the road by in-use testing. For CLEPA, this is a milestone in EU emission legislation, which will help to achieve the long-term political and societal goal of better air quality, as much as ensuring the acceptance of the internal combustion engine through credible emissions on the road.

CLEPA has supported the Real Driving Emissions – Light-Duty Vehicles (RDE-LDV) test throughout its development. Given the introduction of RDE step 1 in September 2017 (new types), CLEPA welcomes the agreement reached in the Technical Committee on Motor Vehicles (TCMV) in December 2016 on the 3rd regulatory package that is mainly focusing on requirements and limits for cold start and particle number. The introduction timing for the particle number requirement (September 2017 for new types and September 2018 for all new vehicles), however, does remain very ambitious as hardware components will have to be adapted.

CLEPA's commitment for complementing the RDE on-road testing during type approval with RDE testing during in-service conformity (ISC) is confirmed for the ongoing preparations of the 4th regulatory RDE package. This crucial aspect of RDE testing will be a key measure to ensure compliance in the vehicle fleet and help rebuilding trust in the automotive industry as well as in the governing regulations. Engine and after treatment technologies for meeting in-service conformity provisions are available on the market today and will contribute to clean internal combustion engines; also for a period of up to five years or 100 000km (whichever is the sooner) as demanded by the Euro 5/Euro 6 legislation.

For the assessment of in-service conformity results coming from the WLTP or RDE conditions, it has to be considered that the emission measurement spread will be substantially higher on the road than on the roller dyno, including the large range of normal driving conditions already defined by the RDE test. This has to be taken into account when developing in-service conformity statistics (for the

treatment of outliers) as well as when studying compliance with the emission limit values. In-service conformity tests should have to respect the defined RDE boundary conditions (e.g. no dedicated worst-case testing, no use of additional engine, after treatment, etc. information that is not available to the normal driver).

In addition to in-service conformity testing by type-approval authorities and vehicle manufacturers, CLEPA understands that third-party testing will be foreseen in the 4th regulatory RDE package. In the current regulation, ISC test results produced by manufacturers are checked by type-approval authorities. CLEPA recommends that the results produced by third parties should also be checked by the granting type-approval authority and with the manufacturer concerned before being included in a publicly available report.

CLEPA is the European Association of Automotive Suppliers. Over 120 of the world's most prominent suppliers for car parts, systems and modules and more than 20 National trade associations and European sector associations are members of CLEPA, representing more than 3 thousand companies and covering all products and services within the automotive supply chain. Based in Brussels, Belgium, CLEPA is recognised as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc.).

Facts about the European automotive industry

- Some **12 million** people are employed in the European automotive industry
- European automotive suppliers directly employ **5 million** people
- European automotive suppliers invest **€22bn** in RDI per year. They are the biggest private investor into research and innovation
- Per year, **18 million** vehicles are manufactured in Europe, contributing to the stability and growth of the European economy