



CIRCULAR 81/02 - 3 - 2

INTERPRETATIONS

Interpretation No 1 (Appendix B, Clause 5.5)

Question:

How does clause 5.5 of Appendix B affect the provision of CO₂ and fuel consumption data on the SE form for ADR81/02 ?

Answer:

Appendix B of ADR81/02 adopts UNECE Regulation 101 as the technical requirement governing the testing of light vehicles to determine fuel consumption and CO₂ emission values. Clause 5.5.1 of UNECE R101 provides that “the CO₂ value adopted as the type approval value shall be the value declared by the manufacturer if the value measured by the technical service does not exceed the declared value by more than 4 percent”.

Clause 5.5.1 is designed to set the boundaries around acceptable variation between test results reported by a manufacturer and those which may be obtained by a technical service (the regulator). This Clause is predicated on the manufacturer declaring a CO₂ value and the technical service performing (or witnessing) a verification test which can be used to validate the manufacturer’s declared value. In the absence of any test by the technical service, Clause 5.5.1 (and thus, the 4% factor) is not relevant.

While the provisions of clause 5.5 make no explicit reference to fuel consumption, it is recognised that as the fuel consumption value is derived, in part, from the CO₂ emissions value, and thus whatever process is applied to the determination of the CO₂ value should also be applied to the fuel consumption value, in order to ensure consistency between the two measures.

Approach

DOIT will take the following approach to the provision of CO₂ emissions and fuel consumption data under ADR81/02:

1. where a manufacturer submits an ECE approval, DOIT will accept the CO₂ and fuel consumption values as presented, consistent with standard practice;
2. where a manufacturer does not have an ECE approval, but can produce evidence of technical service (ECE or EC) test, the manufacturer can apply the provisions of clause 5.5 after comparing the declared value with the value from the technical service test result;
3. where a manufacturer does not have an ECE approval or evidence of EC/ECE technical service tests, the manufacturer can apply the provisions of clause 5.5 after comparing the declared value with the value obtained from an independent third-party technical service accredited for vehicle emissions and fuel consumption testing with the National Association of Testing Authorities (NATA) or the International Laboratory Accreditation Cooperation (ILAC); or
4. In all other circumstances, manufacturers shall quote their own test results as the declared value, which could be based on a single type approval test or the average of multiple tests. It would be expected that the declared result would stand up to scrutiny in any subsequent COP or



TFI under the existing COP/TFI arrangements. The results recorded on the test report and submitted on the SE form shall not be subject to any adjustment.

Interpretation No 2 (Appendix B, Clause 5.5)

Question:

Do AWD vehicles tested on an AWD dynamometer that are deriving their road load from the table in ECE Regulation 83, Annex 4 – Appendix 2, Clause 3.2.1 have to apply the 1.3 factor as stipulated in Clause 3.2.2?

Answer:

No.

As long as the full AWD power train remains connected and loaded in the same manner which would be the case in normal road use, this factor does not need to be applied to the road load. The additional force absorbed in driving the AWD power train need only be factored to the road load when the drive to one end of the vehicle is disabled to enable testing to be performed on 2WD dynamometer.