

Regulation No. 103 - Uniform provisions concerning the approval of replacement pollution control devices for power-driven vehicles

I. State of Play

Regulation No. 103 applies to the approval of pollution control devices to be fitted in one or more types of motor vehicles of categories covered by the scope of the related version of Regulation No. 83 as replacement parts. Catalytic converters and particulate filters are considered to be pollution control devices for the purposes of Regulation No. 103. The replacement pollution control device shall be designed, constructed and mounted so as to enable the vehicle to comply with the provisions of those Regulations which it was originally in compliance with. Pollutant emissions shall be effectively limited throughout the normal life of the vehicle under normal conditions of use. Therefore Regulation No. 103 foresees general durability requirements while mainly referencing to the requirements of Regulation No. 83 but e.g. no mandatory durability testing or follow-up testing (as for in-service conformity or in-use compliance) is foreseen.

The informal document No. GRPE-68-18 of January 2014 illustrated first findings of a German study on the emission performance of approved replacement pollution control devices showing that the performance of the devices currently available on the market can vary to a large extent. GRPE in general supported the initiative to further develop Regulation No. 103. In following discussions with several stakeholders it turned out that the work to further develop Regulation No. 103 cannot be started yet especially due to missing (human) resources from stakeholders due to the ongoing work on different issues of high priority on EU and UNECE level (as e.g. RDE and WLTP). Nevertheless it was emphasized that further information and also the final report of the study would be helpful to prepare the future work in that respect.

Following that request Germany is now in a position to provide GRPE with the corresponding final report of the study (see informal document **GRPE 71-08**).

II. Findings of the German study

Findings of the study undertaken by Germany show that the durability and the emission performance of replacement catalytic converters currently available on the market can vary to a large extent. Besides quite well performing catalytic converters also less performing and less durable systems could generally be placed on the market under the legal regime of Regulation No. 103. Germany therefore recommends that GRPE keeps this issue under close surveillance and aims at improving and updating Regulation No. 103 as early as possible. At the moment it seems nevertheless unclear when this could actually happen with the necessary support from all relevant stakeholders. All stakeholders should nevertheless be invited to contribute to the process as early as possible.