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Re: Proposal for amendments to the Consolidated Resolution on the Construction of Vehicles (R.E.3) **ECE/TRANS/WP.29/GRPE/2015/9** - (AECC, CLEPA, EUROMOT, OICA) and Informal document GRPE -71-04

Dear Mr Chairman,

In answer to your request for comments on the recent proposal by AECC, CLEPA, EUROMOT and OICA to amend the Consolidated Resolution on the Construction of Vehicles (R.E.3) Annex 4 on "Recommendation on Market Fuel Quality", we would like to make the following remarks:

- 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.

Anticipating due consideration of these remarks,

Yours faithfully,

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