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**Position of the Federal Republic of Germany**  
**on**  
**the discussion paper “NEDC/WLTP correlation methodology” forwarded by the**  
**Commission in preparation of the CO<sub>2</sub> Expert Group meeting on 7.5.2015**

1. Germany welcomes that the Commission, by presenting the discussion paper mentioned above, continues to follow a transparent approach with regard to the powers conferred to the Commission under Article 13(7) of Regulation 443/2009 and Article 13(6) of Regulation 510/2011.

2. Germany recalls that the overall aim of the work is an adjustment of the CO<sub>2</sub> monitoring and the CO<sub>2</sub> targets set out in the Regulations 443/2009 and 510/2011 in order to ensure comparable stringency for manufacturers and classes of vehicles under current type approval procedure, as laid down in Regulation (EC) No 715/2007 and Commission Regulation (EC) No 692/2008, and the planned future WLTP test procedure. It emphasises in this respect that the current legislation applies in full.

3. Germany expressed its position to a number of aspects associated with the adjustment in the paper on the monitoring of CO<sub>2</sub> values and the transformation of CO<sub>2</sub> target values, forwarded to the CO<sub>2</sub> Expert Group in January 2015. The German position is still valid, but has been further elaborated in some details, as explained below.

4. Germany intends to forward to the Commission comments in writing, e.g. adaptation of caps, handling of correlated NEDC values, exact calculation procedures, including flexibilities, of individual OEM values in 2020/2021 and in the post 2021 period, treatment of masses, before May, 22<sup>nd</sup>. However, Germany would like to give a few preliminary comments to the Commission’s discussion paper:

(a) Germany would like to draw the attention of the Commission to the “Basic assumptions and preconditions” listed in the German position paper. The Commission’s discussion paper addresses only point (5) of the issues listed. Germany believes that the Commission should not initiate the comitology procedure before the points (1) is met. Moreover, the other points should be part of the Commission’s proposal, be it in form of recitals or in form of conditions which have effect on dates of application of certain parts of the legislation to be decided upon.

(b) Germany believes that the transformation has to be made in 2020/21, e.g. in these years a manufacturers which complies with its individual NEDC targets is considered to also comply under WLTP, whatsoever the monitored WLTP value might be. The correlation methodology is – by definition – a tool which aims at avoiding unnecessary and expensive testing. It delivers estimates for NEDC test results on the basis of WLTP type approval measurements. Therefore it cannot be made obligatory without violating the principle of comparable stringency for manufacturers and classes of vehicles under the current type approval procedure and the planned WLTP type approval procedure since the achievement of the target has by law to be verified on the basis of measurements not of correlations. This can only be ensured if appropriate transformation rules are defined for Super Credits and Eco-Innovations. The empowerment given to the Commission would

allow the mandatory use of the correlation tool only if the tool could ensure comparable stringency for manufacturers and classes of vehicles. This is not the case since the tool is of limited accuracy.

(c) Therefore Germany would like to draw attention to the double measurement approach which is part of the German position paper. Double measurements should be allowed under certain conditions in order to outbalance the uncertainties associated with the use of the correlation tool. They should be allowed:

- in case the results of individual correlations are not accurate enough (case A)
- in case the manufacturer fails to meet the target in 2020/2021 (case B).

Germany is now in the position to specify the accuracy requirements. It should be plus/minus 3 g/km for the individual correlation (case A). In case B - seeing that a decision on double testing has to be taken for practical reasons ahead of the target year - double testing of the whole fleet should be allowed in 2020/21 if the manufacturer provides evidence that his correlated fleet NEDC averages in one of the years in the period 2017 or 2018 or 2019 deviate by more than plus/minus 1 g/km from the measured NEDC the fleet average. For cost reasons the double testing should take place in 2020/21 as a routine procedure of the WLTP type-approval testing, if the criteria are met.

(d) With regard to the Commission's proposal on a number of test conditions<sup>1</sup> Germany takes the following position:

- (i) "Averaging of times in coast down test": The formula laid down in point 5.1.1.2.5 of R 83, Annex 4a, Appendix 7 should be applied for the correlation.
- (ii) "Effect of inertia classes": The adjustment foreseen in table 2 of point 6.2.2.3. of R 83/ R101 should be applied for the correlation.
- (iii) "Initial battery state of charge": The differences between R 101 Annex 7, point 2.3.1.4 and the draft WLTP Regulation must be considered for all vehicles in the correlation; fully charged batteries are the basis of NEDC tests.
- (iv) "Effect of different tyre pressure prescriptions": Under NEDC the average between lower limit and upper limit of the tyre pressure range recommended by the manufacturer at the individual axle should be used for the correlation.
- (v) "Effect of vehicle preconditioning": The load difference applied by the dynamometer resulting from different warm-up cycles, which is a NEDC today and a WLTC for WLTP, should be correlated.
- (vi) "Effect of inertia of rotating parts on road loads": The difference in the applied test mass on a 1-axle dynamometer (1.5%) due to a difference in handling rotating parts between NEDC (R83, Annex 4a) and WLTP (Annex 4, 7.2.1.) should be correlated.

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<sup>1</sup> See Regulations (EC) No 443/2009 and (EU) No 510/2011, as modified by Regulations (EU) No 333/2014 and (EU) No 253/2014 respectively. In these Regulations, see definitions, reference is given to the valid EU type-approval legislation 715/2007 which refers via Commission Regulation 692/2008 to R83/R101.