
EUROMOT POSITION

04 April 2014



Euromot Position on expansion of in-service conformity (ISC) to all power classes and engine applications

Euromot would like to make clear that its support for the ISC program has so far been limited to variable speed non-road engines 56 – 560 kW. Euromot understands from the 13 February 2014 GEME meeting that the European Commission is proposing to expand ISC to other power classes and engine applications (inland waterway, rail, SI, etc). Euromot does not support this action without an assessment of the practical implications and development of an appropriate test methodology for each power class and application.

It is critical to understand that, due to the fact the work-based-window (WBW) ISC test methodology is not a 1:1 match to the type approval test methodology it will most likely be necessary to adapt the prescribed test method where it is used on engines with different type approval requirements (eg different type approval test cycle requirements).

Both larger and smaller machines present particular challenges. From a practical perspective it will be extremely difficult or even impossible to safely mount the required PEMS unit on most machines with engines < 56 kW. For the tiny proportion of machines with engines > 560 kW the sheer size, with high exhaust mass flows, large exhaust diameters and multiple exhausts make testing using the prescribed exhaust mass flow devices impractical. The size also makes removal of the engines for bench testing entirely impractical. Furthermore the harsh environments, near continuous operation and restrictions on access to the machines by pedestrians and service vehicles present major logistical challenges for testing engines in large mining equipment. Inland waterway and rail engines also present specific challenges.

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ENGINE IN SOCIETY

A European Interest Representative (EU Transparency Register Id. No. 6284937371-73)

A Non Governmental Organisation in observer status with the UN Economic Commission for Europe (UNECE) and the International Maritime Organisation (IMO)

Even considering that the proposal outlined by European Commission on 13 February ‘... will be at the level **of monitoring and reporting of the results of the ISC**’ this activity will nevertheless require significant resources and will be highly challenging to conduct across all categories. It should be noted that conducting testing for ISC is an expensive and time consuming process. Employing staff, procuring and maintaining expensive test equipment, identifying candidate engines to test, transporting equipment to the test site, installing and de-installing PEMS equipment (which will require the hire of access platform and lifting equipment for the larger machines), and the impact on the machine owner, must all be taken into consideration. Without further information on the proposed implementation it is impossible to judge the cost-effectiveness to society of introducing ISC

In consequence, Euromot urges European Commission to provide further details of what will be proposed, so that this can be reviewed and appropriate feedback provided BEFORE inclusion of the broad application of ISC in the co-decision act.

EUROMOT – 2014-04-04

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EU Transparency Register ID number: 6284937371-73

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