



Euro 5 study ACEM concerns and priorities

As verbally expressed during the MCWG of September 17th, ACEM continues to request a detailed and thorough investigation into the Euro 5 package. Although the entire package must be investigated, from cost benefit and feasibility aspects, our most significant technical concerns are listed below. We welcome an opportunity to discuss these with the Commission and JRC representatives and look forward to doing so in the near future.

OBD2

Within the full Euro 5 package, ACEM has a very high level of concern over OBD2 and specifically regards misfire detection and catalyst monitoring as priority issues for examination. L-category vehicles do not and cannot use car technology for OBD2 and therefore unique and expensive solutions for L-category vehicles must be developed. We do not foresee such solutions as possible or cost effective in the time allowed. Investigations into misfire detection must examine the options open to the motorcycle industry given that our engines typically do not have flywheels. One of the crucial issues that the EC's Euro 5 study must verify is the reliability of misfire detection methods in high speed engines, closely linked to external influences such as overall vibration levels and interference from chain drive systems and general transmission wear. Where catalyst monitoring is concerned, judgment algorithms related to smaller catalyst volumes than are usually found in cars must be considered along with external influences such as rainfall, more remote coupling, impact on driveability etc.

Type I (Tailpipe emission after cold start)

Limit Values

We continue to question the limit values for Euro 5 as regards feasibility and cost/benefit for all categories, especially for mopeds and diesel engines. We also do not see any justification for the separate Euro 5 NMHC limit which should either be corrected or dropped altogether.

Test Cycle

We believe the application of the WMTC to all L category vehicles is questionable but especially for tricycles and 'traditional' quadricycles. We also feel that for non-L3 vehicles, the cycle module weighting factors need to be examined as does the general driveability of such vehicles on WMTC.

Durability

The AMA cycles should remain available. As in our comments submitted end 2012, we continue to question the SRC-LeCV cycles, especially given the complete absence of data derived from actual use. We are especially worried as to its applicability on a test-track with a human rider. We do not see use in that way as feasible and it should not be assumed all motorcycle manufacturers have alternatives such as durability dynamometers.

