

# 中国 WTO/TBT 国家通报咨询中心

## China WTO/TBT National Notification & Enquiry Center

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<b>Subject:</b> <b>Comments from P. R. China on United States Notification G/TBT/N/USA/1860</b> Advanced Clean Cars II Regulations	

# **Comments from P. R. China on United States Notification**

## **G/TBT/N/USA/1860**

### **Advanced Clean Cars II Regulations**

Dear Sir or Madam,


We appreciate the opportunity to submit comments on the notified draft proposed by United States of American.

Enclosed please find comments in English and Chinese.

Please acknowledge receipt of the comments by e-mail to [tbt@customs.gov.cn](mailto:tbt@customs.gov.cn) and [pengdy\\_tbt@163.com](mailto:pengdy_tbt@163.com).

Thank you very much in advance for United States of American taking into account comments from P.R. China. Your formal reply will be appreciated.

Best regards,



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## Comments from P. R. China on United States Notification

### G/TBT/N/USA/1860

#### Advanced Clean Cars II Regulations

(1) 13 CCR 1961.4(f) quotes the test procedure (California pollutant emission standards and test procedures of passenger vehicles, light trucks, and medium vehicles for model year 2026 and later ) PART I (F) (7)

“7.§ 86.1826 Assigned Deterioration Factors for Small Volume Manufacturers and Small Volume Test Groups.

7.1 § 86.1826-01. April 28, 2014. [No change.]”

We suggest:

①The durability of vehicles produced by small volume manufacturers (Annual sales less than 4,500 units in California) uses the specified deterioration factors, which is specified in the guidance letter issued by EPA dated 30 March 2012 (No. CD-12-07) stipulated the deterioration factors (addition) of exhaust and evaporation emissions of Tier2/ LEV II, which were determined based on gasoline vehicles and alternative fuel models (LPG, CNG, etc.) at that time. The determination method was to rank the deterioration factors of large and medium-sized enterprises from low to high and take 70% of the deterioration factors.

②Under the influence of LEV III and ZEV standards compliance pressure and credit obtaining, enterprises launched PHEV models and achieved a certain market share. Due to external charging, PHEV has a certain pure electric driving range.

③ Durability test needs a range accumulation after a full charge and in the existing 150,000 miles of durabilityrange accumulation process, the pure electric range contributes to the range accumulation. The aging of the engine and emission control system of PHEV are not the same as gasoline and diesel vehicles, since the longer the PHEVtravels with pure electricity, the poorer the aging level of its engine and the emission control system is.

Since the deterioration factors specified by CD-12-07 does not match PHEV models, and pure electric driving range shares part of the accumulated durability range, it is recommended to specify a separate deterioration factors for small volume manufacturers' PHEVs, especially those with high pure electric driving range.



(2) 13 CCR 1961.4(f) quotes the test procedure (California pollutant emission standards and test procedures of passenger vehicles, light trucks, and medium vehicles for model year 2026 and later ) PART II (I) (2)

“For vehicles with one or more driver-selectable modes (e.g., normal mode, economy mode, performance mode, or any other operating mode available to the driver), emission testing must be done in the one driver-selectable mode that represents the worst case urban NMOG+NO<sub>x</sub> emissions over the Urban Emission Test set forth in this Part II, section I.2. For example, if a vehicle has two driver-selectable modes, the manufacturer shall determine worst case NMOG+NO<sub>x</sub> emissions by comparing the emission results of the two driver-selectable modes. Compliance with applicable emission standards shall be based on worst case emission testing.

Confirmatory testing and/or in-use compliance testing may be performed in any driver-selectable mode to ensure compliance with emission standards.”

We suggest:

① Coastdown test road (See SAE J1263 or SAE J2263), test cycles FTP75, HWFET, US06, SC03 and the roads simulated by low temperature FTP are paved with cement and asphalt, featuring excellent testing repeatability .

②For vehicles with more than one driver-selectable modes, emission testing must be done in the one driver-selectable mode that represents the worst case whereas the standard hasn't offered provisions for the sand and mud driving mode (driving mode named after the surface of the driving road) on unpaved roads.

③In the sand or mud driving mode, the vehicle under the emission test running on the actual road surface (simulation) or in the laboratory is in the low-speed and high-torque state, so the emission increases or exceeds the standard compared with the paved road surface.

④ Sand or mud driving modes, which limit the using road and are the selectable-driver modes for special purpose, are used infrequently with short use time. Sand and mud driving modes are used on unpaved road surfaces with low use frequency and little impact and differ from the default paved road in the current standard, it is suggested such emission requirements be exempted in the standard.

**Comments in Chinese are in below:**

(1) 13 CCR 1961.4(f) 引用的测试程序（加利福尼亚州2026车型年及以后车型年乘用车、轻型卡车和中型车辆的污染物排放标准和试验程序）PART I (F) (7) 7. § 86.1826 Assigned Deterioration Factors for Small Volume Manufacturers and Small Volume Test Groups.

7.1 § 86.1826-01. April 28, 2014. [No change.]



### 中方建议:

①小批量制造商(加州年销量小于4500辆)生产的车型耐久性使用指定的劣化系数,指定的劣化系数见2012年3月30日EPA发布的指导信函(编号:CD-12-07),规定了Tier2/LEV II尾气排放和蒸发排放劣化系数(加法),其劣化系数是基于当时的汽油车、替代燃料(LPG、CNG等)车型确定的,确定的方法是将大中型企业的劣化系数由低到高依次排序取70%位置的劣化系数而成。

②受LEV III和ZEV标准合规压力和获取积分的影响,企业推出PHEV车型并取得一定的市场占有率,PHEV因其接收外部充电存在一定的纯电续航里程。

③耐久性试验需要充满电后进行里程累积,在现行15万英里的耐久里程累积过程中,存在纯电续航里程参与里程累积,PHEV车型的发动机及排放控制系统的老化程度不及纯燃油车,PHEV车型的纯电续航里程越长,其发动机及排放控制系统的老化程度越差。

由于CD-12-07指定劣化系数不能匹配PHEV车型,并且纯电续航里程分担部分累积的耐久里程,**建议对小批量制造商的PHEV,特别是高纯电续航里程的PHEV指定单独的劣化系数。**

(2) 13 CCR 1961.4(f)引用的测试程序(加利福尼亚州 2026 车型年及以后车型年乘用车、轻型卡车和中型车辆的污染物排放标准和试验程序) PART II (I) (2) For vehicles with one or more driver-selectable modes (e.g., normal mode, economy mode, performance mode, or any other operating mode available to the driver), emission testing must be done in the one driver-selectable mode that represents the worst case urban NMOG+NOx emissions over the Urban Emission Test set forth in this Part II, section I.2. For example, if a vehicle has two driver-selectable modes, the manufacturer shall determine worst case NMOG+NOx emissions by comparing the emission results of the two driver-selectable modes. Compliance with applicable emission standards shall be based on worst case emission testing.

Confirmatory testing and/or in-use compliance testing may be performed in any driver-selectable mode to ensure compliance with emission standards.

### 中方建议:

①滑行试验道路(见SAE J1263或SAE J2263)和测试工况FTP75、HWFET、US06、SC03以及低温FTP所模拟的道路为采用水泥、沥青等铺装的路面,试验可重复性好。

②对于多个可选驾驶模式的车型,需要在排放结果最差的可选驾驶模式下进行试验,对于在非铺装的路面上行驶的沙地、泥地驾驶模式(以行驶路面命名驾驶模式)标准未作规定。

③车辆以沙地、泥地驾驶模式行驶时,在实际路面(仿真)或试验室进行排放试验,因工作在低速大扭矩状态,相比铺装路面排放量提高或超标。

④沙地、泥地驾驶模式限定使用道路,属于特定用途的可选驾驶模式,使用频次少,使用时间短。

由于沙地、泥地驾驶模式在非铺装路面使用,使用频次低,影响很小,不同于现行标准默认的铺装道路,**建议在标准中予以豁免排放要求。**