

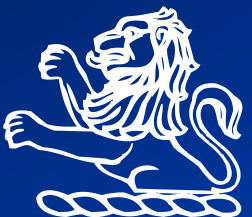
# Future Emission Norms

## Implications for FIE, Controls and Software

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Date: 03<sup>rd</sup> November 2023



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- ◆ Summary

# About Delphi-TVS

- ◆ Joint venture between Phinia (Erstwhile BorgWarner / Delphi), USA and TVS Group to make fuel injection systems for diesel engines.
- ◆ 1<sup>st</sup> Plant set up in 1990.
- ◆ Technical Centres, with Engineers capable of supporting software, application and calibration developments to meet beyond BS6 and Tractors TREM V norms.
- ◆ High level of localization through a network of supplier partners developed in India
- ◆ Over 8 million (3 million CR and 5 million Rotary) Delphi-TVS systems in the field to-date. Products cover entire market range.
- ◆ Extensive aftermarket network with over 300 service centres dedicated to diesel in India and Delphi network worldwide.



# Delphi-TVS

## Manufacturing & Technical Center

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Delphi-TVS produces Diesel FI systems across 2 manufacturing facilities (near Chennai)



### CR Manufacturing Oragadam

- Common Rail FI Systems manufacturing site (Pumps, Injectors, Rails and Filters)



### Technical Center - Mannur

- Application and Calibration Development / Product Development / Validation



### Mechanical FI Manufacturing - Mannur

- Mechanical FI systems manufacturing site (Pumps, Injectors and Filters)

# DTVS - Technical Centre

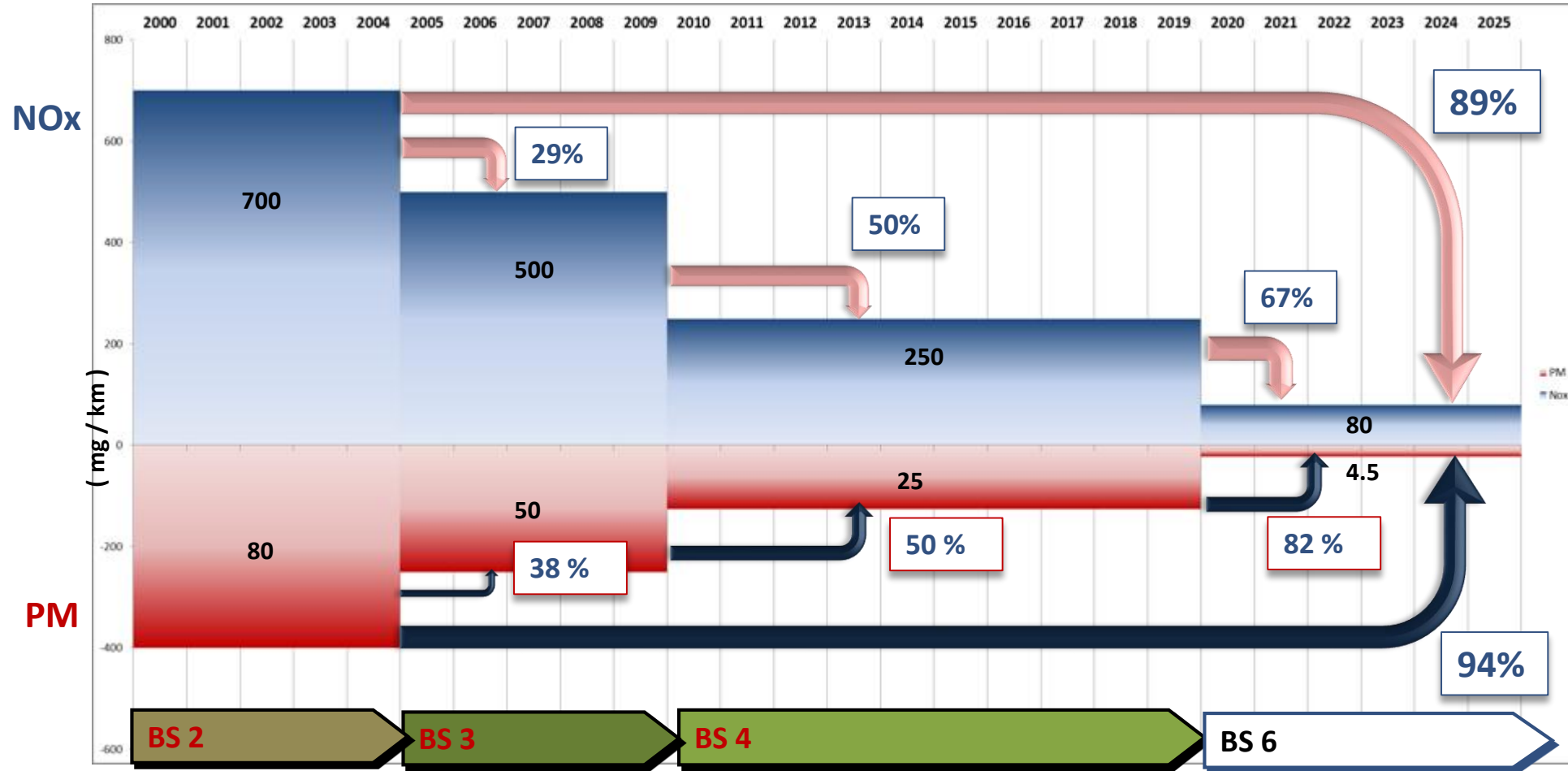
## Snapshot

- Tech Centre was established in 2007.
- Over 200 Engineers involved in development work.
- Group of Electronics engineers to work with customers for initial contact.
- End to end facility for turnkey development available at the Tech Centre.
- All application developments for India market done from here, thereby providing speedy response.





# Progression of Indian emission norms



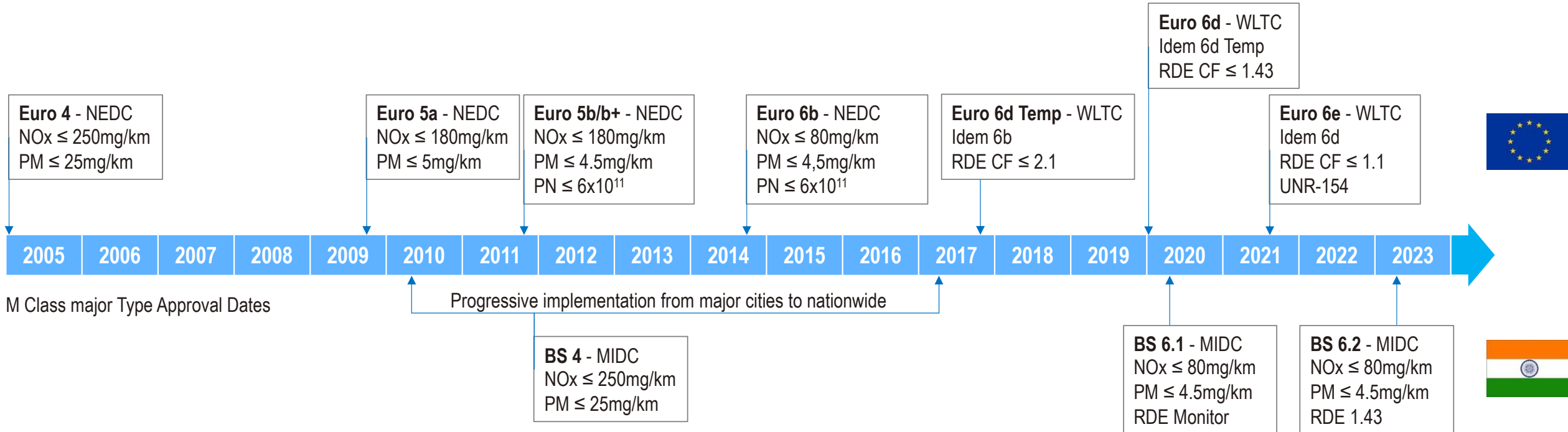
According to some recent studies in Europe, a modern diesel engine consumes up to 25% less fuel and emits up to 15% less CO<sub>2</sub> than a comparable gasoline engine.

# Commercial Vehicles Emission & Fuel Economy Standards



- Implementation date for Euro 7 is unclear

# Background





# EU Proposals – from May 2023

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## ◆ EU Council Compromise Proposal

- Additional one year for all types
- Fixed duration once it comes into force

## ◆ EU Parliament Compromise Proposal

- Additional two years for all types
- Fixed duration
- Additional text to cover use of CO<sub>2</sub> neutral fuels

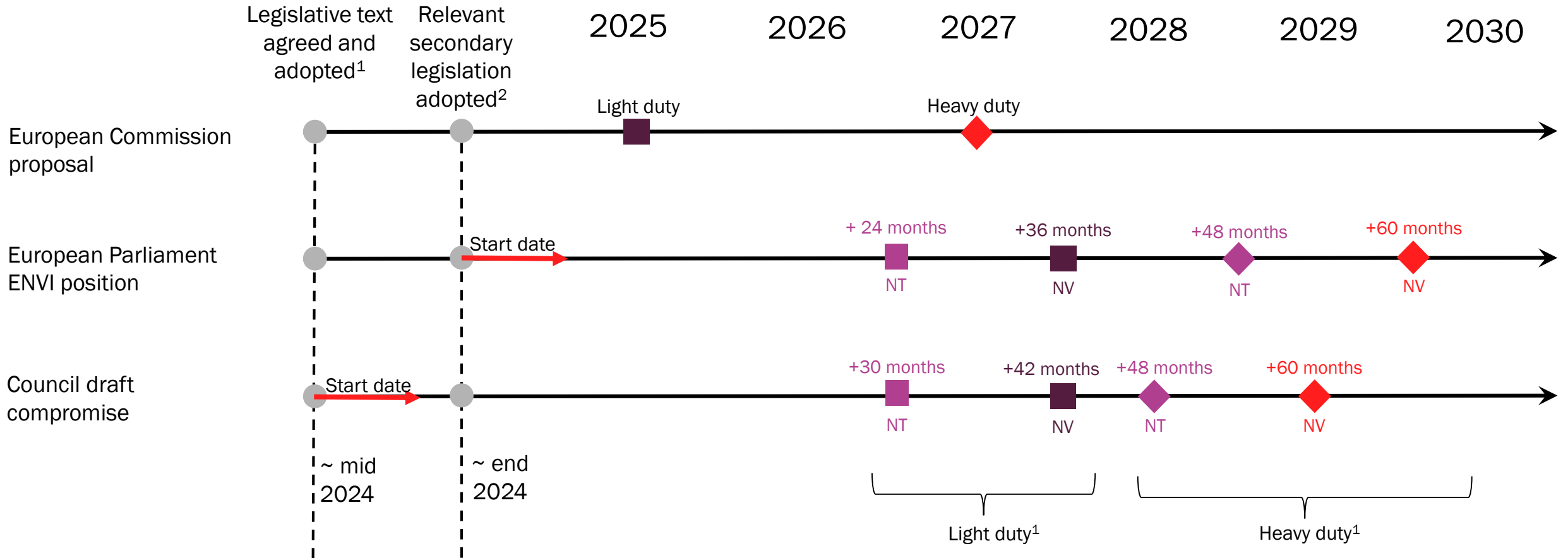
## ◆ Eu 7 LDV Implementation

- New Types - Q2, 2027 to Q1, 2028
- All Types - Q2, 2028 to Q1, 2029

## ◆ Eu 7 HDV Implementation

- New Types - Q2, 2028 to Q1, 2029
- All Types - Q2, 2029 to Q1, 2030

# Institutional positions on implementation dates



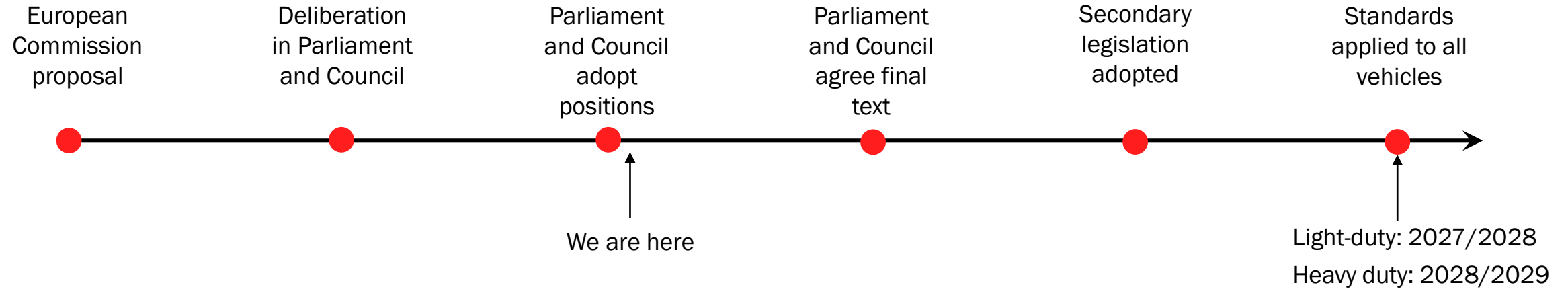
NT: New Types (Entirely new model)

NV: All New Vehicles

<sup>1</sup> estimated

<sup>2</sup> estimated, definition to be clarified

# Euro 7 process (simplified) & expected implementation dates



# Euro 7 emission norms – explanation

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## ◆ No technological distinction

- Euro 7 standard will no longer make a technological distinction between “conventional” gasoline engines, gasoline direct injection (GDI) engines, and diesel engines.
- Lowest emissions among the engines has been chosen for the future.

## ◆ Tighter rules for fine particulate matter

- Euro 6 norm set limits for particles larger than 23 nanometers (Particulate Number, or PN23)
- With the Euro 7 norm, limits are set for particles larger than 10 nanometers (PN10).
- Smaller pollutants need to be considered, but also that more different types of pollutants

## ◆ Extension of emission standards

- The period in which emission requirements must be met has doubled.
- Euro 6 regulations - 100,000 kilometers or 5 years,
- Euro 7 (light-duty) - 200,000 km or 10 years.

# Euro 7 emission norms – explanation

## ◆ Limit for Short and Long Trips

- Engines are most polluting during the first few minutes.
- Cold, combustion is inefficient, and the exhaust aftertreatment systems do not work as effectively.
- Euro 7 standard includes a test specifically for short trips of less than 10 kilometers.

|                       | NOx | PM  | PN10               | CO   | THC  | NMHC | NH3 |
|-----------------------|-----|-----|--------------------|------|------|------|-----|
| RDE (mg/km)           | 60  | 4,5 | $4 \times 10^{11}$ | 500  | 100  | 68   | 20  |
| Trips <10km (mg/trip) | 600 | 45  | $6 \times 10^{12}$ | 5000 | 1000 | 680  | 200 |

## ◆ Self-registration – used for ISC and Surveillance

- Euro 7 vehicles must monitor themselves,
- Existing OBD will change to OBM
- Many additional sensors and a computer where the data can be stored and read.

## ◆ Maximum emission limits on brakes and tyres

- Limit on the emissions from brakes and tyres, which will restrict the amount of brake dust and tyre particulates from all types of cars.

# Proposed standards & potential outcome – heavy duty

## Proposed limits

Euro 7 Exhaust emission limits for M<sub>2</sub>,M<sub>3</sub>,N<sub>2</sub> and N<sub>3</sub> vehicles

| Pollutant Emissions    | Cold emission <sup>2</sup> | Hot emissions <sup>3</sup> | Emission budget for all trips less than 3*WHTC long | Optional idle emission limits <sup>4</sup> |
|------------------------|----------------------------|----------------------------|---|--|
|                        | <i>per kWh</i>             | <i>per kWh</i>             | <i>per kWh</i>                                      | <i>per hour</i>                            |
| NO <sub>x</sub> in mg  | 350                        | 90                         | 150   | 5000                                       |
| PM in mg               | 12                         | 8                          | 10  |  |
| PN <sub>10</sub> in #  | 5×10 <sup>11</sup>         | 2×10 <sup>11</sup>         | 3×10 <sup>11</sup>                                  |  |
| CO in mg               | 3500                       | 200                        | 2700  |  |
| NMOG in mg             | 200                        | 50                         | 75  |  |
| NH <sub>3</sub> in mg  | 65                         | 65                         | 70  |  |
| CH <sub>4</sub> in mg  | 500                        | 350                        | 500   |  |
| N <sub>2</sub> O in mg | 160                        | 100                        | 140   |  |

<sup>2</sup> Cold emissions refers to 100<sup>th</sup> percentile of moving windows (MW) of 1 WHTC for vehicles, or WHTC<sub>cold</sub> for engines

<sup>3</sup> Hot emissions refers to the 90<sup>th</sup> percentile of moving windows of 1 WHTC for vehicles or WHTC<sub>hot</sub> for engines

<sup>4</sup> Applicable only if a system is not present that automatically shuts down the engine after 300 seconds of continuous idling operation (once the vehicle is stopped and brakes applied)

## Potential outcome

- ▶ Limits maintained (except potentially higher limits for PN, N<sub>2</sub>O)
- ▶ Possibly simplified limit and testing structure (replacing 90th percentile with average)
- ▶ Greater freedom to type approve with engine-only testing (with on-road testing for in-service conformity)



# Proposed On-Road Test Conditions – heavy duty

| Parameter  | Normal driving conditions  | Extended driving conditions*   |
|--|----------------------------|--|
| Extended driving divider                         | -                          | 2 (applies to measured emissions only during the time when one of the conditions set out in this column applies) |
| Ambient temperature                              | -7°C to 35°C               | -10°C to -7°C or 35°C to 45°C  |
| Maximum altitude                                 | 1600 m                     | From 1600 to 1800 m  |
| Towing/aerodynamic modifications                 | Not allowed                | Allowed according to manufacturer specifications and up to the regulated speed                                   |
| Vehicle Payload                                  | Higher or equal than 10%   | Less than 10%  |
| Auxiliaries                                      | Possible as per normal use | -  |
| Internal combustion Engine Loading at cold start | Any                        | -  |
| Trip composition                                 | As per usual use           | -  |

Extended test conditions of temperature, altitude, speed and trips make it stricter and more difficult to test

# Euro7 emission limits Passenger Cars and Vans

|                     | EU6e<br>Gasoline                       | EU6e<br>Diesel           | EU7<br>COM(2022) 586                             | EU Council<br>22.09.2023     |                            | ENVI*<br>12.10.2023<br>M1,N1 Class1/2/3              |
|---------------------|--|--------------------------|--|------------------------------|----------------------------|--|
|                     |  |                          |  | Gasoline<br>M1,N1 Class1/2/3 | Diesel<br>M1,N1 Class1/2/3 |  |
| NOx [mg(km)]        | 60                                     | 80                       | 60   | 60                           | 80                         | 60/75/82   |
| PM [mg(km)]         | 4.5                                    | 4.5                      | 4.5  | 4.5                          |                            | 4.5  |
| PN [-]              | 6*10 <sup>11</sup> >23nm               | 6*10 <sup>11</sup> >23nm | 6*10 <sup>11</sup> >10nm                         | 6*10 <sup>11</sup> >23nm     |                            | 6*10 <sup>11</sup> >10nm                             |
| CO [mg(km)]         | 1000                                   | 500                      | 500  | 1000/1810/2270               | 500/630/740                | 500/630/740  |
| THC [mg(km)]        | 100                                    | NOx+HC<br>170            | 100  | 100/130/150                  | NOx+HC<br>170/195/215      | 100/130/160  |
| NMHC [mg(km)]       | 68                                     |                          | 68   | 68/90/108                    |                            | 68/90/108  |
| NH3 [mg(km)]        | -                                      | -                        | 20   | -                            |                            | 20   |
| RDE CF              | NOx 1.1/<br>PN 1.34                    | NOx 1.1/<br>PN 1.34      | 1.0  | ?                            |                            | -  |
| Cold start          | (16km) ***                             |                          | 10km **  | (16km) ***                   |                            | 10 km **   |
| Durability          | 160kkm<br>(ISC 100kkm 5y)              |                          | 160kkm 8y<br>200kkm 10y *                        | 160kkm 8y<br>200kkm 10y *    |                            | 200kkm 10y<br>240kkm 12y *                           |
| Evap                | 2g @ 48h diurnal<br>Refuelling 0.05g/L |                          | 0.5/test<br>Refuelling 0.05g/L                   | 2.0 g/test<br>No refuelling  |                            | 0.5/test<br>Refuelling 0.05g/L                       |
| OBM                 | no                                     | no                       | yes  | yes                          |                            | yes  |
| RDE test conditions | Maximum dynamic parameters defines     |                          | Any test, with weak<br>safeguard against<br>bias | Euro 6 conditions            |                            | Any test, with<br>stronger safeguard<br>against bias |

\* Durability multiplier of 1.2 applicable between 160kkm and 200kkm  
 \*\* EU7 Cold start budget [mg] = Distance x emission limit;  
 \*\*\*EU6 minimum trip distance of urban phase RDE

\*European Parliament's Committee on the Environment, Public Health and Food Safety (ENVI)<sup>6</sup>

# Euro7/VII emission limits Heavy duty vehicles

|                     | EU VI                       | EU7<br>COM(2022) 586                                |                             | EU Council<br>22.09.2023  |                             | ENVI*<br>12.10.2023  |                               |
|---------------------|-----------------------------|---|-----------------------------|---|-----------------------------|--|-------------------------------|
|                     |                             | Cold  | Warm                        | WHSC/WHTC   | RDE                         | WHSC/WHTC  | RDE                           |
| NOx [mg/kWh]        | 460 mg/kWh                  | 350 mg/kWh  | 90 mg/kWh                   | 230   | 300                         | 200  | 260                           |
| PM [mg/kWh]         | 10 mg/kWh                   | 12 mg/kWh   | 8 mg/kWh                    | 8   | -                           | 8  | 10                            |
| PN [-]              | 6*10 <sup>11</sup><br>>23nm | 5*10 <sup>11</sup><br>>10nm                         | 2*10 <sup>11</sup><br>>10nm | 6*10 <sup>11</sup><br>>23nm   | 9*10 <sup>11</sup><br>>23nm | 6*10 <sup>11</sup><br>>10nm  | 7.8*10 <sup>11</sup><br>>10nm |
| CO [mg/kWh]         | 4000 mg/kWh                 | 3500 mg/kWh   | 200 mg/kWh                  | 1500  | 1950                        | 1500   | 1950                          |
| NMOG [mg/kWh]       | 160 mg/kWh                  | 200 mg/kWh  | 50 mg/kWh                   | 80  | 105                         | 75   | 98                            |
| NH3 [mg/kWh]        | 10 ppm                      | 65 mg/kWh   | 65 mg/kWh                   | 65  | 85                          | 60   | 78                            |
| CH4 [mg/kWh]        | 500 mg/kWh                  | 500 mg/kWh  | 250 mg/kWh                  | 500   | 650                         | 500  | 650                           |
| N2O [mg/kWh]        | -                           | 160 mg/kWh  | 100 mg/kWh                  | 200   | 260                         | 160  | 208                           |
| Durability          | 500 kkm 7y                  | Main lifetime 700 kkm 15y<br>Add. Lifetime: 875 kkm |                             | N2,N3,M3* 300 kkm 8y / 375 kkm 10y<br>N3,M3 700kkm 12y, 875 kkm 15y |                             | N2,N3,M3* 340 kkm 10y / 400 kkm 12y<br>N3,M3 750kkm 15y, 900 kkm 17y |                               |
| OBM                 | -                           | yes   |                             | yes   |                             | yes  |                               |
| RDE test conditions | Optional ISC                | Any test, with no explicit safeguard against bias   |                             | Euro 6 conditions   |                             | Any test, with stronger safeguard against bias                       |                               |

\* N2, N3 < 16t, M3 <7,5t

\* N2, N3 < 16t, M3 <7,5t

# Expected Outcome

|               | EU Council<br>22.09.2023   |                                   | ENVI<br>12.10.2023  |   |
|---------------|--|-----------------------------------|---|---|
|               | WHSC/WHTC  | RDE                               | WHSC/WHTC   | RDE                                     |
| NOx [mg/kWh]  | <b>230</b>   | <b>300</b>                        | 200   | 260                                     |
| PM [mg/kWh]   | <b>8</b>   | -                                 | 8   | 10                                      |
| PN [-]        | <b>6*10<sup>11</sup></b><br>>23nm  | <b>9*10<sup>11</sup></b><br>>23nm | 6*10 <sup>11</sup><br><b>&gt;10nm</b>                               | 7.8*10 <sup>11</sup><br><b>&gt;10nm</b> |
| CO [mg/kWh]   | <b>1500</b>  | <b>1950</b>                       | 1500  | 1950                                    |
| NMOG [mg/kWh] | <b>80</b>  | <b>105</b>                        | 75  | 98                                      |
| NH3 [mg/kWh]  | <b>65</b>  | <b>85</b>                         | 60  | 78                                      |
| CH4 [mg/kWh]  | <b>500</b>   | <b>650</b>                        | 500   | 650                                     |
| N2O [mg/kWh]  | <b>200</b>   | <b>260</b>                        | 160   | 208                                     |
| Durability    | <b>N2,N3,M3 300 kkm 8y / 375 kkm 10y</b><br><b>N3,M3 700kkm 12y, 875 kkm 15y</b> |                                   | N2,N3,M3 340 kkm 10y / 400 kkm 12y<br>N3,M3 750kkm 15y, 900 kkm 17y |   |
| OBM           | <b>yes</b>   |                                   | yes   |   |

# Special focus on CO2 for HD

## CO2 regulation situation for HD (14th of Feb)

The standards will apply to all classes of heavy duty freight and passenger vehicles, whereby current CO<sub>2</sub> standards only apply to medium and long-haul trucks. The following are the proposed revisions of the CO<sub>2</sub> reduction targets (vs. the 2019 baseline), and estimates for implied fleet shares of zero-emission vehicles (ZEV):

For all heavy-duty trucks (>3.5 tonnes) and coaches (8 or more passenger seats):

- 2025 No change: 15%
- 2030 Reduction target changed from 30% to 43% (~35-40% ZEV fleet share required)
- 2035 New reduction target of 64% (~60% ZEV fleet share required)
- 2040 New reduction target of 90% (at least 90% ZEV fleet share required)

For urban buses:

- 2030 100% ZEVs

The definition of heavy-duty ZEV includes any vehicle with CO<sub>2</sub> emissions less than 5g/tonne-km or 5g/passenger-km (which would accommodate H<sub>2</sub>ICE vehicles, including those with diesel pilot injection). This definition is likely to be resisted by some NGOs, who are fundamentally against ICEs. A potential compromise could be a tighter threshold, which would still define pure H<sub>2</sub>ICE vehicles as ZEV.

- New Regulation introduction will generate huge change in HD powertrain approach in next decade :
  - 2025 : Possible with ICE => Further step possible, cylinder deactivation, thermal management, friction reduction, small electrification...
  - 2030 :
    - For urban buses : Electrification 100%? H2 ICE? H2 Fuel Cells?
    - For HD trucks : 35/40% ZEV fleet share required ! E-fuel ? H2 ? Electrification ? NGVs ?
  - Further 2035 : Strong reduction of pure ICE...Growth for alternative Powertrain system HPH2? Enhance Fuel Cells? Electrification ?

CO2 regulations still in negotiation but likely to have strong impact on current HD PWT definition

# Euro 7 challenges

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- ◆ Euro 7 will require FIE upgrades, emission control update and significant amount of software development
- ◆ FIE upgrades
  - Accuracy
  - Long term stability
  - Modelling
  - After treatment control
- ◆ After treatment
  - Close coupled DOC and deNOx
  - Double SCR systems
  - Preheating of catalyst



# Legislation – Euro7 EMISSION REGULATION - HD

## WP1- Wet System/Emissions WP4- System

Proposed implementation by July 2027

Euro VII emissions limits vs Euro VI

|                   |        | Euro VII                    | Euro VII                   | Euro VI               | If Euro VII  |
|-------------------|--------|-----------------------------|----------------------------|-----------------------|--------------|
|                   |        | Cold emissions <sup>2</sup> | Hot emissions <sup>3</sup> | Combined <sup>4</sup> | was weighted |
| NOx               | mg/kWh | 350                         | 90                         | 460                   | 126          |
| PM                | mg/kWh | 12                          | 8                          | 10                    | 9            |
| PN <sub>10</sub>  | Number | 5.00E+11                    | 2.00E+11                   | 6.00E+11              |              |
| CO                | mg/kWh | 3500                        | 200                        | 4000                  | 662          |
| NMOG <sup>5</sup> | mg/kWh | 200                         | 50                         | 160 (THC)             | 71           |
| NH <sub>3</sub>   | mg/kWh | 65                          | 65                         | 10ppm                 |              |
| CH <sub>4</sub>   | mg/kWh | 500                         | 350                        | 500                   | 371          |
| N <sub>2</sub> O  | mg/kWh | 160                         | 100                        | N/A                   |              |

- Cold and hot cycle tests now have their own specific limits in Euro VII (Euro VI is a weighted average of the two cycles).
- All limits are generally lower than Euro VI.
- NOx and N<sub>2</sub>O limits will be challenging to meet – aftertreatment calibration.
- Total Hydrocarbon (THC) limit changed to NMOG to encompass emissions that could result from use of bio, paraffinic or synthetic fuels.

Comparison of engines and pollution control devices durability (ref. Article 6)

|                                  |         | Trucks and coaches (N <sub>2</sub> , N <sub>3</sub> , M <sub>3</sub> ) |            |   |            |
|----------------------------------|---------|--|------------|---|------------|
|                                  |         | N <sub>2</sub> , N <sub>3</sub> <16t, M <sub>3</sub> <7.5t             |            | N <sub>3</sub> >16t, M <sub>3</sub> >7.5t |            |
|                                  |         | Euro VI  | Euro VII   | Euro VI                                   | Euro VII   |
| Lifetime                         | Mileage | 300,000 km   | 300,000 km | 700,000 km                                | 700,000 km |
|                                  | Years   | 6  | 8          | 7   | 15         |
|                                  | CF      | 1.5  | 1.0        | 1.5                                       | 1.0        |
| Additional lifetime <sup>6</sup> |         | -  | 375,000 km | -   | 875,000 km |

- For HD vehicles, both mileage and duration are increased
- Conformity Factor (CF) is deleted from Euro VII, as PEMS systems are now considered sufficiently accurate.

| Pollutant emissions    | Emission budget for all trips less than 3*WHTC long | Optional idle emission limits <sup>4</sup> |
|------------------------|---|--|
|                        | per kWh   | per hour                                   |
| NO <sub>x</sub> in mg  | 150   | 5000                                       |
| PM in mg               | 10  |  |
| PN <sub>10</sub> in #  | 3x10 <sup>11</sup>                                  |  |
| CO in mg               | 2700  |  |
| NMOG in mg             | 75  |  |
| NH <sub>3</sub> in mg  | 70  |  |
| CH <sub>4</sub> in mg  | 500   |  |
| N <sub>2</sub> O in mg | 140   |  |

- Specific emissions budget given if ISC test is shorter than 3x WHTC length (it was 4x at Euro VI).
- This is to give a tougher focus on the cold start portion of the test.
- The conformity limits are very low
- In addition an idle NOx limit is introduced – this is new for Euro VII
- Designed to prevent idling to warm the cab while driver is sleeping

- Strong reduction of pollutants !
- Introduction of cold phase limit & idle Nox limit
- Reduction of CF from 1.5 to 1.0 & both mileage & duration are increased.
- ⇒ Improved fuelling accuracy & stability required. Smallest pilot injection required (?) Highest inj pressure (?)
- ⇒ Multiple injections number will increase close to PC.
- ⇒ Close loop mandatory for performance stability vs lifetime.
- ⇒ Impact in control/strategies for Generic Platform to be considered.

# Euro 7 – Legislation update – Status

## WP1- WetSystem/Emissions WP4- System

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- For Diesel LCV programs Delphi-TVS / PHINIA system (wet system + strategies) can fulfill BS7 requirements with current data available.
- For MD/HD Diesel due to more severe emissions limits, increase mileage for in service conformity and reduced CF situation is more complex and three attributes need to be addressed :
  - **Engine out emissions reduction. (The ATS is controlled by OEMs &/or FIE supplier (SCR + DPF) with already strategies available).**
    - ↳ Injection pattern close to latest pass car specification (high number of injections, small separation, improved fueling accuracy).
      - ↳ HD/MD injector upgrade required (part to part, injection dispersion, etc..). Close loop control mandatory for EU7.
  - **CO2 reduction. The contribution of Fuel System is not key but to be considered.**
    - ↳ Reduction of leakages (injector/pump), reduction of weight, increase of pumping efficiency.
  - **In service conformity**
    - ↳ Mainly injector stability versus time and robust close loop control strategy.

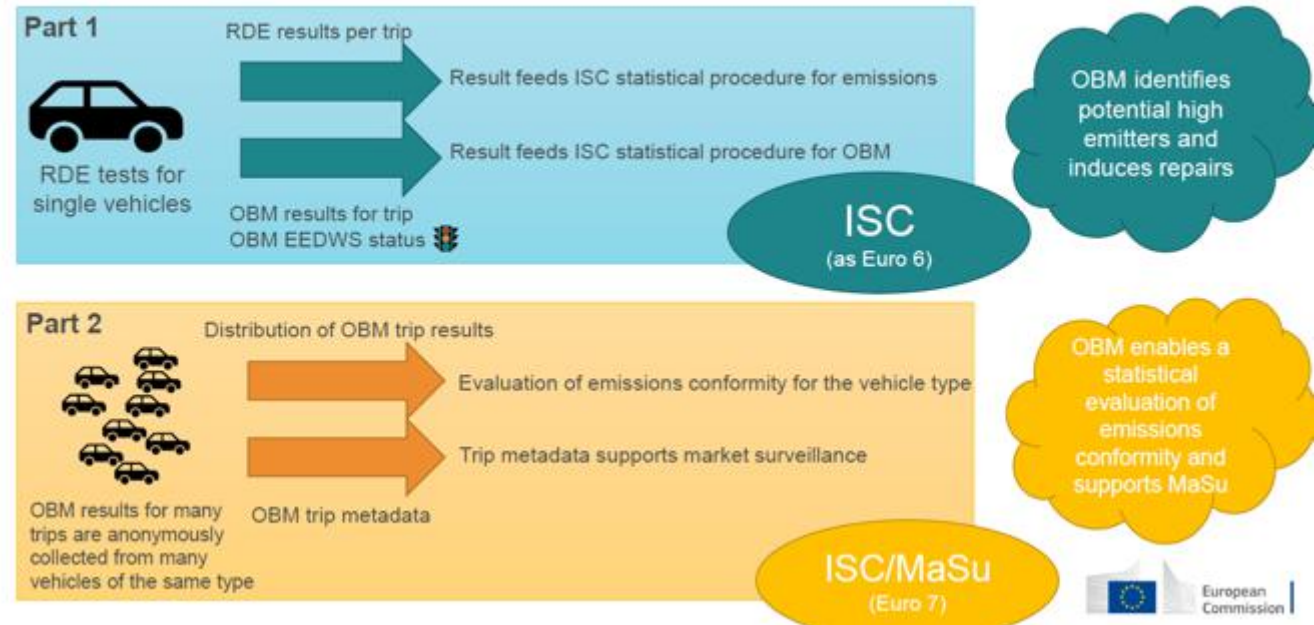
# EU7 OBM/OBD challenge & implementation PC/LCV/HD

## Exceedance Emission Driver Warning System (EEDWS)

- ◆ OBM is the most significant challenge for Euro 7
- ◆ Traffic light system with display to the driver
- ◆ Warn driver when emissions are inconclusive or 2.5x limit
- ◆ Access via OBD port
- ◆ Cold start emissions are included
- ◆ Most emissions to be covered
- ◆ Validation of OBMs across all use cases and durability
- ◆ EU commission expect OBM to be accurate even above 200k kms
- ◆ Will be used as ISC and for Market Surveillance
- ◆ Multi component ageing

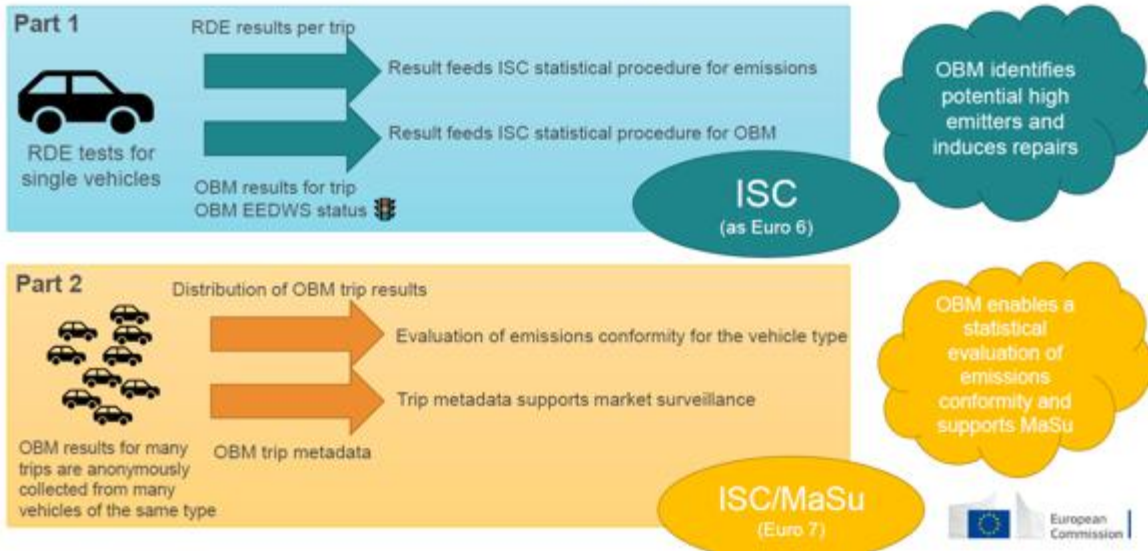


## OBM as a compliance tool (overview)



# EU7 OBM/OBD challenge & implementation PC/LCV/HD

## OBM as a compliance tool (overview)



- Good progress but not fully defined
- Introduction of OBM with real time pollutants survey could impact the EMS system (HW/SW)
- Sensors required
- Intensive introduction of virtual sensors, models, neural network.
- Increase of testing/Calibration/Validation effort...

Exceedance Emission Driver Warning System

### ISC case matrix

|                               |  | EEDWS (pollutant-specific)   |  |   |
|-------------------------------|--|--|--|---|
|                               |  |  |  |   |
| RDE ISC emissions test result |  | ISC statistical procedures for emissions and OBM continue normally   | ISC statistical procedures for emissions and OBM continue normally   | No ISC testing for emissions or OBM – no fail possible<br>Verification of inducement possible |
|                               |  | ISC statistical procedures for emissions and OBM continue normally   | ISC statistical procedures for emissions and OBM continue normally   | No ISC testing for emissions or OBM – no fail possible<br>Verification of inducement possible |
|                               |  | Emissions ISC fails<br>ISC statistical procedure for OBM continues normally unless OBM trip underreports by >30% (then, OBM ISC fails) | Emissions ISC fails<br>ISC statistical procedure for OBM continues normally unless OBM trip underreports by >42% (then, OBM ISC fails) | No ISC testing for emissions or OBM – no fail possible<br>Verification of inducement possible |

Note: if EEDWS status changes after the RDE ISC test, the most favourable conditions apply

# Summary

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- ◆ Fuel agnostic, tighter, longer durability will be the aim of new norms
- ◆ Fuel Injection System and Controls will have a major role to play in meeting these norms
- ◆ OBM could a significant addition
- ◆ Adoption of future norms (BS 7?) for India to be discussed and evolved
- ◆ Significant effort required for calibration, modelling and software development.
- ◆ Sufficient time required for any new implementation.