RECOMMENDATIONS FROM THE EAST AFRICA COMMUNITY SUB-REGIONAL MEETING ON
DRAFT HARMONIZED VEHICLE EMISSION STANDARDS

14 - 15 November 2019, UN Environment, Nairobi, Kenya

The participants agreed on the following recommendations and principles:

A. General recommendations
i. Good political will is needed to ensure successful development and implementation of vehicle emission standards;
ii. There is need to actively involve stakeholders in the development and implementation of vehicle emission standards. This will help in making the standards more acceptable and improve compliance levels;
iii. There is need to not only establish adequate number of vehicle inspection and testing centers by EAC Partner States but also ensure that such centers are equipped with technologies that are aligned with the current global trends;
iv. It is important for EAC Partner States to closely monitor fuel import quality that could support a move to higher standards of emission limits;
v. EAC Partner States should confirm whether emission limits for new motor vehicles in the draft standards reflects at least Euro IV/4 emission limits;
vi. There is need to clearly define a time frame for consensus building at the national level to enable standards to be discussed and approved in time;
vii. There is need to ensure that vehicles manufactured in the sub-region comply with the global criteria on safety and emissions;
viii. The Air Quality Technical Committee secretariat was asked to establish a working group to revise the draft standards based on comments from the meeting and incorporate experts where necessary;
ix. Different initiatives are being undertaken by Partner States to reduce emission from motor vehicles;
x. Rwanda to share a write-up on rationale for selecting the respective limits in the working draft by 29th November, 2019.

B. General Principles
i. There is need to relook at the scope of the standard to make it more specific and comprehensive;
ii. There is need to consider structuring the standard into parts. e.g Part One- limits for new vehicles; Part Two- limits for imported vehicles and Part Three- limits for in-use vehicles, building on the experience of Rwanda that has already drafted and adopted similar standards;
iii. The references to the annexes should be reviewed with the view of adopting the source documents in accordance with the rules for making normative reference;

iv. Vehicle age may be an important factor to consider in controlling vehicle emissions but should not form part of the standards;

v. There is need to consider available regulations under environment and transport in the EAC Partner States to inform the draft EAC vehicle emission standards;

vi. The scope should exclude electric mobility;

vii. The draft standard should give due consideration to other types of green technology;

viii. Consider reviewing the notes in the draft standard in reference to emission limits to provide advisory information rather than the technology and avoid being prescriptive;

ix. The draft EAC harmonized vehicle emission standards should serve as the EAC position for harmonization of vehicle emissions at the African Organisation for Standardisation (ARSO) and Tripartite Transport and Transit Facilitation Programme (TTTFP). The EAC members are urged to actively participate in the ARSO Process.

x. The emission limits for in-use vehicles should be informed by available data in the Sub-Region. This will help in creating a win-win situation for harmonization of such standards;

xi. It is important to note that the overall goal of the harmonized vehicle emission standards is emission reduction from the transport sector

C. Comments on the draft harmonized standards

Participants made the following comments on the draft standards;

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<th>DRAFT VEHICLE EXHAUST EMISSION STANDARDS</th>
<th>COMMENTS</th>
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<tbody>
<tr>
<td><strong>ITEM</strong></td>
<td><strong>COMMENTS</strong></td>
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| Scope                                    | • The pollutants should be specified, in particular oxides of nitrogen;  
• Consider replacing total suspended particulate matter with particulate matter to ensure consistency in the standard;  
• The third sentence should incorporate the word emissions....to read “Emissions from all vehicles...”;  
• The TC to consider adding various types of standards....For new vehicles, imported used and in-use vehicles.  
• Specify vehicles that are not covered by the standard such as electric vehicles  
• Expunge defined terms not used in the standard |
<p>| Normative Reference                      | • Delete ISO 3929 from the list as it has not been mentioned in the standard |</p>
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<tr>
<th>Terminology</th>
<th>• The definition of used vehicle should read “any motor vehicle, motor cycle or motor tricycle which has previously been owned or registered in relevant authority from any other jurisdiction.”</th>
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| General Requirements | • 4.1.1: Consider specifying the vehicles that shall be inspected and tested….e.g. new vehicles, imported vehicles and in – use vehicles;  
• Need to align 4.1.1 and 4.1.2 for clarity;  
• Consider providing a paragraph to specify the categories of vehicles;  
• 4.1.5: Consider using may instead of shall. |
| Emission Standards for all vehicles | • Align all the tables;  
• Abbreviation in table 1 should be SPM and not PM  
• Delete word “law”  
• Consider specifying the test method in the tables instead of referring to the annex;  
• Consider using, “All imported used motor vehicle must be fitted with at least the Euro 4 compliant engine” on the note on tables for limits of imported vehicles;  
• Align how you define 4.1 and 4.1.2 to avoid ambiguity  
• Revise the titles of table 1 & 2 by making them short and precise. Some contents of the title can be captured in the text  
• Capture information on different types of measurements in the introduction for common understanding.  
• Consider removing the note on tables for limits for imported vehicles and find a way of referring to the technology  
• Provide explanatory notes on the emission limits to help with TC discussions  
• To avoid ambiguity under date of manufacture in table 6, a range should be provided |
| Test methods | • The test methods should be in publicly available documents |
| Annex B | • Annex B should be informative |