

From: [REDACTED]
To: [vemissions](#)
Cc: [REDACTED]
Subject: BRP CANADA SUBMISSION -VEHICLE EMISSIONS DISCUSSION PAPER
Date: Friday, 8 April 2016 5:17:34 PM

To Whom It May Concern

Dear Sir/Madam,

On behalf of BRP Canada, I hereby submit the Company's comments in response to request for submissions as contained in the Vehicle Emissions Discussion Paper, released February last.

BRP, through the Can-Am Spyder tradename, markets in Australia 'LEM2' Category (Three Wheeled) L-group vehicles. Can-Am Spyder offering in Australia is tightly linked to Europe's and Japan's regulations. While the two are not perfectly in tune, they generally aligned.

- As of February 2016 (MY2016), all Can-Am Spyder models comply with the EU 2 exhaust requirements as defined by EU Directives 2002/24/EC & 97/24/EC as last amended (Test method being UNECE R40).
- With one or two year lag on EU, Australian Can-Am Spyder models should match EU's performance and thus, comply with Eu 4 per the new EU regulations (Reg. (EU) 168/2013 & REPPR 1334/2014)
- If Euro 5 is introduced in 1/1/2020-1/1/2021 in EU, a similar transition is envisioned for Can-Am Spydery proposed for the Australian market.
- BRP is opposed to CO2 limits for 'L' Category vehicles mainly because they are not aligned with international regulations.
- Also BRP is opposed to any fleet averaging standard for fuel efficiency for 'L'-category manufacturers. Mainly because 'L'-category OEM are typically smaller than passenger car OEM and do not have the range of models which allows flexibility in the product offering of passenger car (e.g. Can-Am Spyder has only one or two engines so averaging is almost a strict limit). Moreover, any averaging system brings very burdensome administrative requirements for compiling, reporting and proving.
- In Europe there is no discussion about the introduction of CO2 limit. Therefore to impose a CO2 requirement for L-category manufacturers in Australia, which make up less than 4.5% of the registered vehicle fleet and on average consume far less fuel for each kilometre travelled than light vehicles (and thereby emit much less CO2), would not only be contrary to international practice but also unjustified for Australia.

Regards

Paul P

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