Environment and Climate Change Canada
Environnement et Changement climatique Canada

GUIDANCE DOCUMENT

Submission Requirements for Evidence of Conformity for Light-duty Vehicles, Light-duty Trucks, Medium-duty Passenger Vehicles and Heavy-duty Class 2b and 3 Vehicles

In Relation to the On-road Vehicle and Engine Emission Regulations and the Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations Made Under the *Canadian Environmental Protection Act, 1999*

Canada

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GUIDANCE DOCUMENT

SUBMISSION REQUIREMENTS FOR EVIDENCE OF CONFORMITY FOR LIGHT-DUTY VEHICLES, LIGHT-DUTY TRUCKS, MEDIUM-DUTY PASSENGER VEHICLES AND HEAVY-DUTY CLASS 2B AND 3 VEHICLES

IN RELATION TO THE
ON-ROAD VEHICLE AND ENGINE EMISSION REGULATIONS
AND THE
PASSENGER AUTOMOBILE AND LIGHT TRUCK GREENHOUSE GAS EMISSION REGULATIONS
MADE UNDER THE
CANADIAN ENVIRONMENTAL PROTECTION ACT, 1999

Disclaimer

This document is intended to provide guidance only. It does not in any way supersede or modify the *Canadian Environmental Protection Act (CEPA), 1999, PALTGGER*, *ORVEER*, or their amendments. In the event of an inconsistency between this document and the CEPA , the PALTGGER and/or the ORVEER, the CEPA, the PALTGGER and the ORVEER prevail.

Environment and Climate Change Canada
May 2020

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1.0 Purpose

This document provides guidance on the implementation of the *On-Road Vehicle and Engine Emission Regulations* (the ORVEER) and the *Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations* (the PALTGGER) made under the *Canadian Environmental Protection Act, 1999* (CEPA). Specifically, it describes what evidence of conformity to both the ORVEER and the PALTGGER (the Regulations) is required and what procedures should be followed when submitting evidence of conformity for light-duty vehicles, light-duty trucks, medium-duty passenger vehicles, class 2b vehicles and class 3 vehicles (paragraphs 6(1)(a), (b), (c) and (d) of the ORVEER) manufactured for sale in Canada or imported into Canada.

2.0 Evidence of Conformity

According to subsection 153(1) of CEPA, vehicles must conform to standards prescribed by ORVEER. Evidence of conformity with those standards must be "obtained and produced in the prescribed form and manner or, if the regulations so provide, in a form and manner satisfactory to the Minister[1] (paragraph 153(1)(b)). Obtaining, maintaining and submitting evidence of conformity are requirements of importation under the Act and the ORVEER. Sections 35, 35.1 and 36 of the ORVEER specify the form and manner requirements for evidence of conformity.

The ORVEER provides five options for complying with the evidence of conformity requirement. When determining which type of submission to provide, a company should consider the information required, the timing of the submission, the applicable standards and the label required. Before the import of a vehicle or, in the case of 153(2) of CEPA with proper declaration, before the vehicle leaves the possession or control of the company[2] or before affixing the National Emissions Mark (NEM), a company must ensure that it has the **complete** evidence of conformity readily available. This information must be maintained in accordance with section 38 of the ORVEER. The following table provides an overview of the options that are available.

[1] For the purpose of this document, Minister refers to the Minister of Environment and Climate Change Canada
[2] For more information on this clause refer to section 42 of the ORVEER

Table 1: Options for submitting evidence of conformity

Type of Submission	Information Required	Timing of Submission	Applicable Standards	Type of Emission Label
35(1) Covered by a U.S. Environmental Protection Agency (EPA) Certificate & sold concurrently in Canada and the United States	See section 2.1.1 of this document	Upon request	ORVEER Section 19 & PALTGGER Section 12 (Standards listed on EPA certificate where applicable)	EPA's VECI label, as per EPA certification
35(1) Covered by an EPA Certificate & affixed with the NEM	See section 2.1.2 of this document	Upon request	ORVEER Section 19 & PALTGGER Section 12 (Standards listed on EPA certificate where applicable)	EPA's VECI label, as per 35(1)(d)(i)
35(1.1) Covered by an EPA Certificate	See section 2.1.3 of this document	Before importing or affixing NEM	ORVEER Section 19 & PALTGGER Section 12 (Standards listed on EPA certificate where applicable)	EPA's VECI label, as per 35(1)(d)(i)
35.1 Equivalent to a vehicle Covered by an EPA Certificate	See section 2.2 of this document	Before importing or affixing NEM	ORVEER Section 19 & PALTGGER Sections 9-10 and subsections 44(3) and 44(4) (Standards listed on EPA certificate where applicable)	Canadian label, as per guidance
36 Canada-unique	See section 2.3 of this document	Before importing or affixing NEM	ORVEER 11 - 17, PALTGGER Section 9 - 11 + In-use section 44(3) and 44(4)	Canadian label, as per guidance

Under the CEPA and Regulations, the responsible company is the one that manufactures the vehicle in Canada or imports the vehicle into Canada that is legally responsible to maintain and submit the evidence of conformity. In addition, it is the company's responsibility to ensure that information provided to the Minister is accurate, complete and that the vehicles imported into Canada or manufactured in Canada are identical to the vehicles described in the evidence of conformity. The

company importing the vehicle remains liable for producing the appropriate evidence of conformity when requested.

As defined in section 149 of the CEPA, a company means a person who:

a) is engaged in the business of manufacturing vehicles, engines or equipment in Canada;
b) is engaged in the business of selling to other persons, for the purpose resale by those persons, vehicles, engines or equipment obtained directly from a person described in paragraph (a) or the agent of such a person; or
c) imports any vehicle, engine or equipment into Canada for the purpose of sale. (*enterprise*)

For the purposes of this document, the word "company" is referring to the CEPA company as defined in the Act.

2.1 Covered by an EPA certificate

In the United States, manufacturers and importers are required to certify their vehicles with the U.S. Environmental Protection Agency (EPA) prior to being introduced into commerce. U.S. companies submit an EPA application for certification, which contains technical information about all models within a test group and demonstrates that the models within the test group conform to the applicable standards. The EPA reviews the application and if satisfied, issues a Certificate of Conformity which allows the U.S. company to sell the models listed on the certificate.

For the purpose of the ORVEER, a vehicle is considered to be covered by an EPA certificate if its make and model are specifically listed on a valid EPA certificate of the same model year and which is in a configuration permitted by the EPA certificate. It is the company's responsibility to ensure that the model of the vehicle being imported or offered for sale in Canada be in all material respects as described in the EPA application for certification. An example of an EPA certificate has been included in Appendix A.

The ORVEER allows for a company to use EPA certification and, in many cases, industry chooses to heavily rely on this provision. However, the Minister must be informed of any discrepancies between the vehicle certified in the U.S. and the vehicle that is imported or manufactured in Canada. This includes the scenario when a Canadian company chooses to use a different model name or a variation of the model name listed on the EPA certificate or in the EPA application for certification. When there are discrepancies, the company must inform the Minister of the difference(s) by submitting an equivalent vehicle submission prior to import or manufacturing (see section 2.2 of this document).

The intent of subsection 19(1) of the ORVEER is to provide companies with some choice regarding how they demonstrate compliance when importing or manufacturing a vehicle which is covered by an EPA certificate of conformity. For vehicles covered by an EPA certificate, a company may select whether to conform to either the standards found in sections 11 to 17 of the ORVEER or the standards found in section 19 of the ORVEER (those listed on the EPA certificate). This decision is established prior to the time of import or NEM affixation and defines the content and timing of evidence of conformity (EoC) to meet the condition of 153(1)(b) of CEPA. It is important to note that this decision is only required for the ORVEER since under the PALTGGER, if a vehicle is covered by a certificate and bears the U.S. EPA VECI label, it must conform to the standards found in section 12 of the PALTGGER (those listed on the EPA certificate). If a company chooses to meet section 11 to 17 of the ORVEER, the vehicle will not be considered to be covered by an EPA certificate for these Regulations, and would need to follow

requirements under section 36. A different VECI label would need to be affixed and would therefore not reflect the VECI label described in the EPA application for certification supporting the certificate.

Furthermore, if a company is unable to obtain all the documents identified in section 35 of the ORVEER (such as the full and complete records submitted to the EPA in support of the EPA certificate) prior to import or if it is relying on section 153(2) of the CEPA, prior to the vehicle leaving the possession or control of the company[3] , then the vehicle cannot be considered covered by an EPA certificate in Canada. Obtaining these documents is a condition of import or manufacture outlined in section 153 of the CEPA. A company must obtain and maintain the required documents for each model year. Alternatively, a company may always choose to provide evidence of conformity under section 36 of the ORVEER regardless of the existence of an EPA certificate, concurrent sales or a NEM (see section 2.3 of this document).

There are 3 options for providing evidence of conformity when a vehicle is covered by an EPA certificate.

2.1.1 Vehicle covered by an EPA certificate and sold concurrently in Canada and in the United States – subsection 35(1)

Subsection 35(1) of the ORVEER identifies the evidence of conformity required in the case of a vehicle that is covered by a valid EPA certificate and sold concurrently in Canada and in the United States. In this case a company may choose, as per subsection 19(1) of the ORVEER, to conform to the certification and in use standards referred to in the EPA certificate instead of the standards described in sections 11 to 17 of the ORVEER. This decision is only required under the ORVEER since under the PALTGGER, if a vehicle is covered by a certificate and bears the U.S. EPA VECI label, it must conform to the standards found in section 12 of the PALTGGER (those listed on the EPA certificate).

Concurrent sale is defined in section 1.1 of the ORVEER. In general, a vehicle that is sold in Canada is considered to be “sold concurrently” in the United States if any vehicle of that model year that belongs to the same test group is offered for sale in the United States during the 365 days preceding the vehicle’s importation into Canada, the application of the NEM, or, in the case of subsection 153(2) of the CEPA, before the vehicle leaves possession or control of the company (see section 4.0 of this document). The following are examples of accepted documents that may be submitted;

1. A vehicle of the same test group and model year is sold to the first retail purchaser or leaser in the United States. This must be substantiated with any of a, b, or c below:
a) Copy of dated invoice to the first U.S. retail purchaser/leaser;
b) Copy of dated invoice to a U.S. party who sells or leases at the U.S. retail level (e.g. dealer); or
c) Copy of dated purchase order between a U.S. party and the first U.S. retail purchaser/leaser.

2. A dated advertisement of the test group and model year targeted at U.S. consumers (this could include sales brochure, printed ad, magazine, price list etc.) demonstrating that the product was actively marketed and available for delivery in the U.S.

3. A dated U.S. manufacturer/importer/dealer list for the same test group and model year for the U.S. demonstrating that the product was actively marketed and available for delivery in the U.S.

[3] Refer to section 42 of the ORVEER

4. A dated copy of an invoice from the same test group and model year from the factory to a U.S. distributor showing that the products have been wholesaled* in the U.S. This demonstrates sale of products at the wholesale level which will inevitably convert to retail sales over time.

* *Wholesale as defined by the Gage Canadian Dictionary means "the sale of goods in large quantities at a time, usually to retailers rather than to consumers directly."*

If a company chooses to rely on subsection 35(1) of the ORVEER to meet the evidence of conformity requirements for a vehicle covered by an EPA certificate and sold concurrently in Canada and in the United States, it is required that the following information be obtained at the time of import or affixing the NEM and maintained in its complete form and submitted upon written request from the Minister:

a) A copy of the EPA certificate covering the vehicle;
b) For a vehicle that does not have a NEM affixed, a document demonstrating that a vehicle that belongs to the test group was offered for sale in the United States during the 365 days preceding the day on which the vehicle is imported into Canada
    i. Please provide the date of importation into Canada of the vehicle;
c) A copy of the records submitted to the EPA in support of the application for the EPA certificate in respect of the vehicle and any application for an amendment to that EPA certificate and any records submitted to the EPA to maintain that EPA certificate.
    i. This is inclusive of all versions of the certificate applications and records (i.e. U.S. EPA Part 1, Part 2, associated Common Sections and Running Changes);
    ii. Service manuals and technical service bulletins form part of an EPA certificate application as per CFR §86.1844-01(e)(5); and
d) A copy of the Vehicle Emissions Control Information (VECI) label.

2.1.2 Vehicle covered by an EPA certificate and affixed with the NEM – subsection 35(1)

If a company chooses to affix the NEM to a vehicle covered by a valid EPA certificate, proof of concurrent sale is not required, nor is the actual event of concurrent sale necessary.

It should be noted that the NEM is required for vehicles that are manufactured in Canada and will be transported between provinces and/or territories. Before affixing the NEM, the company must obtain the authorization of the Minister. For more information on the NEM, please contact the Regulatory Administration Section. Contact information can be found in section 5.6.

If a company chooses to rely on subsection 35(1) of the ORVEER to comply with the evidence of conformity for a vehicle covered by an EPA certificate and affixed with a NEM, the following information must be maintained and is required to be submitted, as per subsection 38(3) of the ORVEER, only upon request from the Minister:

a) A copy of the EPA certificate covering the vehicle;
b) A document demonstrating that the vehicles covered by the EPA certificate bears the national emissions mark;

c) A copy of the records submitted to the EPA in support of the application for the EPA certificate in respect of the vehicle and any application for an amendment to that EPA certificate and any records submitted to the EPA to maintain that EPA certificate;
    i. This is inclusive of all versions of the certificate applications and records (i.e. U.S. EPA Part 1, Part 2, associated Common Sections and Running Changes);
    ii. Service manuals and technical service bulletins form part of an EPA certificate application as per CFR §86.1844-01(e)(5); and
d) A U.S. emission control information label that is permanently affixed to the vehicle in the form and location set out in section 1807 of Title 40, chapter I, subchapter C, part 86, subpart S, of the CFR for the applicable model year of vehicle.

In reference to item b) above, an example of a document demonstrating that the NEM is affixed to the vehicle is provided in Appendix B.

2.1.3 Vehicle covered by an EPA certificate and not sold concurrently in Canada and the United States or not affixed with a NEM – subsection 35(1.1)

If a vehicle is covered by a valid EPA certificate, but it is not sold concurrently in Canada and the United States (see section 2.1.1 of this document) or it does not have a NEM affixed to it, evidence of conformity must be submitted to the Minister before importation as per subsection 35(1.1) of the ORVEER. Alternatively, a company may always choose to provide evidence of conformity under section 36 of the ORVEER regardless of the existence of an EPA certificate, concurrent sales, or the NEM (see section 2.3 of this document).

If a company chooses to rely on subsection 35(1.1) of the ORVEER to comply with the evidence of conformity requirements for a vehicle covered by an EPA certificate but not sold in the United States or not affixed with the NEM, the following information must be maintained and is required to be submitted prior to importation:

a) A copy of the EPA certificate covering the vehicle;
b) A Statement of Compliance Letter (see section 2.3.1 of this document);
c) A copy of the records submitted to the EPA in support of the application for the EPA certificate in respect of the vehicle to which it is equivalent and any application for an amendment to that EPA certificate and any records submitted to the EPA to maintain that EPA certificate;
    i. This is inclusive of all versions of the certificate applications and records (i.e. U.S. EPA Part 1, Part 2, associated Common Sections and Running Changes);
    ii. Service manuals and technical service bulletins form part of an EPA certificate application as per CFR §86.1844-01(e)(5);
d) A U.S. emission control information label that is permanently affixed to the vehicle in the form and location set out in section 1807 of Title 40, chapter I, subchapter C, part 86, subpart S, of the CFR for the applicable model year of vehicle.

2.2 Equivalent Vehicle – section 35.1

Section 19.1 of the ORVEER states that a vehicle of a specific model year that is not covered by an EPA certificate may be considered equivalent to a vehicle that is covered by an EPA certificate if a company submits the evidence of conformity referred to in section 35.1. The equivalency of a vehicle is determined by the Minister, based on the information outlined in section 35.1.

An equivalent vehicle must be in the same configuration as the vehicle covered by the EPA certificate. To be in the same configuration means that:

a) Both vehicles share all the necessary features described in sections 1821 and 1827 of Title 40, chapter I, subchapter C, part 86, subpart S, of the CFR that are used by the EPA to classify vehicles into test groups and into evaporative/refueling families;
b) The equivalent vehicle has the same emission control features; and
c) The equivalent vehicle has no features that could cause it to have a higher level of emissions than the certified vehicle.

In other words, to be equivalent, the vehicle would therefore be able to be sold in the United States "as is," if it were listed on the EPA certificate or in the EPA application for certification.

To import or manufacture vehicles which are not in the same configuration as the vehicle covered by the EPA certificate, a company must submit a Canada-unique submission, as per section 36 of the ORVEER (see section 2.3 of this document).

As specified in subsection 19.1(2) of the ORVEER, the determination of a vehicle being equivalent to a vehicle covered by an EPA certificate is made by the Minister, based on the evidence of conformity described in section 35.1 of the ORVEER. If the Minister has determined that a vehicle is equivalent, it will be considered in Canada to be covered by the EPA certificate provided in the evidence of conformity. This equivalent vehicle can only be sold in Canada during the period for which the EPA certificate is valid in the United States.

If a company chooses to rely on section 35.1 of the ORVEER to comply with the evidence of conformity requirements for an equivalent vehicle, the following information must be maintained and is required to be submitted prior to importation or before affixing the NEM:

a) A written statement that the vehicle has the same emission control features as the vehicle tested to obtain the EPA certificate and has no features that could cause it to have a higher level of emissions than that certified vehicle; and
b) A copy of the EPA certificate covering the vehicle to which it is equivalent.

Additionally, if a company chooses to rely on section 35.1 of the ORVEER to comply with the evidence of conformity requirements for an equivalent vehicle, the following information must be maintained and is required to be submitted only upon request from the Minister:

c) A copy of the records submitted to the EPA in support of the application for the EPA certificate in respect of the vehicle to which it is equivalent and any application for an amendment to that EPA certificate and any records submitted to the EPA to maintain that EPA certificate;
    i. This is inclusive of all versions of the certificate applications and records (i.e. U.S. EPA Part 1, Part 2, associated Common Sections and Running Changes);

ii. Service manuals and technical service bulletins form part of an EPA certificate application as per CFR §86.1844-01(e)(5);

d) For the 2017 and later model years, an emission control information label that is permanently affixed to the vehicle in a readily accessible location and that contains information that is equivalent to the information required under the CFR provisions referred to in subparagraph 35.1(1)(d)(i) of the ORVEER and either:
   i) a national emissions mark affixed in manner prescribed by subsection 8(3) of the ORVEER, or
   ii) the statement "THIS VEHICLE CONFORMS TO ALL APPLICABLE STANDARDS PRESCRIBED BY THE ON-ROAD VEHICLE AND ENGINE EMISSION REGULATIONS / CE VÉHICULE EST CONFORME À TOUTES LES NORMES QUI LUI SONT APPLICABLES EN VERTU DU RÈGLEMENT SUR LES ÉMISSIONS DES VÉHICULES ROUTIERS ET DE LEURS MOTEURS."

e) Additional evidence, obtained and produced in a form and manner satisfactory to the Minister, establishing that the vehicle and the vehicle covered by the EPA certificate are equivalent in that they share all the features described in the CFR that are used by the EPA to classify vehicles into test groups and, as applicable, into families based on evaporative and refueling emissions.

An example of a statement of compliance letter is provided in Appendix C, which contains the statement referenced in a) above.

To facilitate the review of the equivalent vehicle submission, please provide a comparison table between the two models along with items a) and b) listed above. This information is often requested as a follow-up, as per paragraph 35.1(1)(e) of the ORVEER. This table should compare the information listed in sections 1821 and 1827 of Title 40, chapter I, subchapter C, part 86, subpart S, of the CFR for both the vehicle covered by the EPA certificate and the vehicle that the company believes to be equivalent. An example of a comparison table can be found in Appendix D.

Please note that companies must submit equivalent vehicle submissions for each model year. If a company continues equivalent vehicle submissions for subsequent model years, please ensure that this information is submitted to the Minister before importation, sale or the NEM is affixed.

2.3 Canada-Unique Vehicle – section 36

In general, the term "Canada-unique" refers to a vehicle that is neither covered by an EPA certificate nor equivalent to a vehicle covered by an EPA certificate. However, a company may choose to provide evidence of conformity under section 36 of the ORVEER regardless of the existence of an EPA certificate, concurrent sales or a NEM. Using this option, the company choses to conform to the standards set out in section 11 and 17 of the ORVEER, rather than those listed on the EPA certificate.

For the purpose of paragraph 153(1)(b) of the CEPA, section 36 of the ORVEER requires evidence of conformity for a Canada-unique vehicle to be obtained and produced "in a form and manner satisfactory to the Minister."

Since the Regulations are aligned with those of the United States, the general intent is to enable companies to establish compliance by submitting information similar to that which is provided to obtain an EPA certificate and required under paragraph 35(1)(c) of the ORVEER. The following sections

summarize the evidence of conformity that shall be obtained and produced "in a form and manner satisfactory to the Minister," as per section 36 of the ORVEER.

It should be noted that the standards that are applicable to a Canada-Unique vehicle are the standards found in section 11 and 17 of the ORVEER and PALTGGER which reference sections 1806, 1811, 1813 and 1816 of Title 40, chapter I, subchapter C, part 86, subpart S and section 103 of Title 40, chapter I, subchapter U, part 1037, subpart B of the CFR. As per section 1(2) of the ORVEER, the standards that are incorporated by reference in the ORVEER from the CFR are those expressly set out in the CFR and shall be read as excluding:

- References to the EPA or the Administrator of the EPA exercising discretion;
- Alternative standards related to fleet averages, other averages, emission credits, small volume manufacturers, or financial hardship; and
- Standards or evidence of conformity of any authority other than the EPA or California Air Resources Board (CARB).

If a company chooses to rely on section 36 of the ORVEER to comply with the evidence of conformity for a Canada-Unique vehicle, the following information must be maintained and is required to be submitted under section 36 of the ORVEER, prior to importation or before affixing the NEM:

a) Statement of Compliance Letter (see section 2.3.1 of this document);
b) Technical information (see section 2.3.2 of this document); and
c) A sample drawing or copy of the Vehicle Emission Control Information (VECI) label that will be affixed to the vehicle (see section 2.3.3 of this document).

Please note that companies must submit Canada-unique submissions for each model year. If a company continues Canada-unique submissions for subsequent model years, this information must be submitted to the Minister before importation, sale or applying the NEM.

If a company intends to make any changes to a vehicle for which a Canada-unique submission has been filed, such that the altered vehicle is no longer identical to the initial submission, the Minister must be notified. Furthermore, if there exists a possibility these changes could be expected to alter vehicle emissions and/or the description of the models covered within the test group, the Minister must be notified. Companies must submit an amendment to the Canada-unique submission which provides a description and explanation for any proposed running changes along with sufficient evidence that the vehicles covered by the Canada-unique submission will comply with the applicable standards after the changes are applied. Alternations cause this vehicle to be considered new and providing new EoC ensures that any import post-changes will be compliant.

2.3.1 Statement of Compliance Letter

A submission of evidence of conformity under section 36 or subsection 35(1.1) of the ORVEER must contain an original signed letter from an authorized representative of the company. An example of a statement of compliance letter is provided in Appendix E.

The letter must include, as a minimum, the following items:

- Name and address of the company;
- The identification of the vehicle (e.g. model year, make, model, test group, evaporative/refueling family, vehicle class);

- The applicable exhaust and evaporative emission standards, family emission limits and useful lives;
- Estimated projected sales in Canada for the test group;
- An unconditional statement of compliance with all the applicable standards and requirements of the *On-Road Vehicle and Engine Emission Regulations* made under the *Canadian Environmental Protection Act, 1999*;
- A statement that the vehicles are manufactured to the same specifications as those set out in the evidence of conformity;
- A statement acknowledging that the signatory is authorized to act on behalf of the company; and
- A request for an acknowledgment by Environment and Cimate Change Canada that the evidence of conformity submitted has been obtained and produced in a form and manner satisfactory to the Minister.

The following additional information may be included:

- The identity of persons/entities (both inside or outside of the company) that may be contacted regarding the submission (e.g. technical contacts for importers);
- Indicate if the information being submitted is a direct carry-over (i.e. identical) to a submission that was received and acknowledged by the Minister the previous year;
- Indicate whether some information is to be treated as confidential; and
- Any other information believed to be relevant.

2.3.2 Technical Information

The technical information required is similar to that found in an EPA application for certification. It is based on information that is submitted to the EPA for the purpose of certification as defined in section 1844 of Title 40, chapter I, subchapter C, part 86, subpart S, of the CFR. It should be noted that this list may change from time to time to respond to new technology, evolving testing and information requirements for different types of vehicles, and to stay aligned with the EPA's requirements in the United States. The current list of technical information that is required can be found in Appendix F. To demonstrate compliance with the applicable standards, the test results provided in the evidence of conformity must be obtained using the test procedures and calculation methods identified in section 18 of the ORVEER and section 11 of the PALTGGER which reference:

- Title 40, chapter I, subchapter C, Part 86, subparts A, B and C of the CFR; and
- Title 40, chapter I, subchapter Q, Part 600, subparts A, B and C of the CFR.

2.3.3 Vehicle Emission Control Information (VECI) label

A sample drawing or copy of the Vehicle Emission Control Information (VECI) label must be included in the submission of evidence of conformity. The information contained on the label is similar to that listed in section 1807 of Title 40, chapter I, subchapter C, part 86, subpart S, of the CFR, excluding the EPA compliance statement. The technical information presented on the VECI label can be provided in English but the compliance statement, required if the vehicle is not affixed with the NEM, must be provided in English and in French. Additional details and requirements, including an example of a VECI label can be found in Appendix G. Requirements for the naming of test groups, evaporative/refueling families and durability groups are included in Appendix H.

3.0 Advanced Technology Vehicles

Advanced technology vehicles such as hybrid electric vehicles (HEV), plug in hybrid electric vehicles (PHEV), fuel cell vehicles (FCV) and battery powered fully electric vehicles (BEV) are not excluded from the Regulations, provided that they meet the definition of a "vehicle" as per section 149 of the CEPA and an "on-road vehicle" as per section 1 of the ORVEER. The type of submission for an advanced technology vehicle is determined using the same criteria as a combustion engine powered vehicle previously described in section 2.0 of this document.

If an advanced technology vehicle is a Canada-unique product, the evidence of conformity consists of the same items described in section 2.3 of this document. However, certain items may be modified to reflect the technical requirements for advanced technology vehicles as described in section 1844 of Title 40, chapter I, subchapter C, part 86 subpart S of the CFR. Evidence of conformity submitted to the Minister must include all special procedures necessary for the proper operation and testing of advanced technology vehicles. This could include but is not limited to:

- A description of the criteria used by the manufacturer to determine durability and test grouping;
- Proper charging procedures;
- Regenerative braking system description of operation;
- Activation procedure for test modes or dyno modes;
- Any information that is provided in the owner's manual documents;
- Any additional information which is necessary to properly demonstrate compliance with applicable standards; and
- Electric ranges according to the certification.

Test group determination for advanced technology vehicles should be consistent with paragraph 1827-01(f) of Title 40, chapter I, subchapter C, part 86 subpart S of the CFR. Manufacturers may provide a statement of compliance with their application as described in §1829-15(f) of Title 40, chapter I, Subchapter C, part 86 subpart S of the CFR. The naming conventions for test groups and durability groups specific to advanced technology vehicles are included in Appendix H.

An example of a statement of compliance letter specific to advanced technology vehicles is provided in Appendix I.

The sample list of technical information that Environment and Climate Change Canada requires can be found in appendix F. This sample list may change from time to time to reflect the introduction of new advanced technologies or to maintain consistency with the technical requirements of the EPA.

An example of a VECI label, along with additional details and requirements can be found in appendix G. Manufacturers may choose to indicate in the emission control section of the VECI label that the vehicle to which this label is affixed is an advanced technology vehicle.

As with combustion powered vehicles, the general intent is to enable companies to establish compliance by submitting information similar to that which is provided to obtain an EPA certificate and required under paragraph 35(1)(c) of the ORVEER. As an additional reference, EPA guidance letter CD-14-19 (see section 6.0) provides a list of suggested technical considerations for advanced technology vehicle submissions.

4.0 Incomplete Vehicles

A company may import an incomplete vehicle under subsection 153(2) of the CEPA, provided that it submits a declaration prior to importation, as per section 42 of the ORVEER and the requirements of subsection 153(1) of the CEPA are satisfied before the vehicle leaves the possession or control of the company and before the vehicle is presented for registration under the laws of a province or an aboriginal government, or before affixing a NEM.

An incomplete vehicle is one which, at the time of importation requires additional assembly as per the manufacturer's instruction. These vehicles must, when completed in accordance with instructions and specifications provided by the manufacturer, conform to the standards prescribed under the Regulations or the EPA certificate used to demonstrate conformity. In addition, all other regulatory requirements apply to incomplete vehicles.

The options for submitting evidence of conformity for an incomplete vehicle are the same as those listed in Table 1 (see section 2.0 of this document). Any information which is required to be submitted prior to importation must instead be submitted before the vehicle leaves the possession or control of the company and before the vehicle is presented for registration under the laws of a province or an aboriginal government, or before affixing a NEM.

Should a company choose to rely on an EPA certificate of conformity to demonstrate compliance when importing an incomplete vehicle, any alterations made by the company to the vehicle must not cause the completed vehicle to deviate from the specifications listed in the evidence of conformity which support that EPA certificate. As per paragraph 1848-10(c)(4) of Title 40, chapter I, subchapter C, part 86, subpart S, of the CFR, this could include exceeding maximum curb weight or frontal area limitations. In this case, it would be considered a different vehicle and require certification.

5.0 Administrative Information

It is each company's responsibility to ensure compliance with all applicable sections of the Regulations. In addition to the evidence of conformity, there are other regulatory obligations covered under the Regulations. For further information regarding other administrative requirements, such as submitting Importation Declarations and End of Model Year Reports, or for general inquiries, please contact the Regulatory Administration Section. Contact information can be found in section 5.6.

5.1 Maintenance of Records

Regardless of the type of submission for evidence of conformity, a company is responsible for obtaining these records prior to import, or if it is relying on section 153(2) of CEPA, prior to the vehicle leaving the possession or control of the company[4], before affixing a NEM. Additionally, these records must be maintained after import, as per paragraph 153(1)(g) of the CEPA, in accordance with section 38 of the ORVEER. Evidence of conformity must be maintained by a company for a period of at least eight years after the date of manufacture. As required by paragraphs 35(1)(c) and 35.1(1)(c) of the ORVEER, the maintenance of records includes:

[4] Refer to section 42 of the ORVEER for more information

- A copy of the records submitted to the EPA in support of the application for the EPA certificate;
- Any application for amendment to that EPA certificate; and
- Any records submitted to the EPA to maintain that EPA certificate.

Alternatively, if this information is maintained on behalf of a company, the company must keep a record of where the evidence of conformity is located and who is responsible for this information. A company must maintain the required documents for each model year.

If the Minister makes a written request for the evidence of conformity, a company must provide this information, under subsection 38(3) of the ORVEER, in either official language, within 40 days, or 60 days if the information must be translated from a language other than English or French.

5.2 Suspension/Revocation of an EPA Certificate

If an EPA certificate referred to in section 19 or 19.1 of the ORVEER is suspended or revoked, any company that used that certificate to meet evidence of conformity requirements, is required to submit information to the Minister within 60 days after the day on which the certificate is suspended or revoked in accordance with section 38.1 of the ORVEER. Contact information can be found in section 5.6.

5.3 Who should submit evidence of conformity

Each company that either imports or that affixes a national emissions mark is responsible for maintaining and submitting the evidence of conformity as required in subsection 153(1) of the CEPA and in accordance with sections 35, 35.1, 36 and 38 of the ORVEER, as described in this document.

The intent of the ORVEER is that companies have access to evidence of conformity, to be in a position to ensure that the products they import or manufacture are identical in all material respects to the evidence of conformity documentation and the vehicle that was used to obtain the test results.

5.4 How to submit evidence of conformity

It is recommended that the submission for evidence of conformity be provided electronically and must be in PDF or Microsoft Word format. The information can be provided in either English or French. Please use a descriptive subject line, such as "Evidence of conformity – [*model year*, *make*, *model*, *company name*]." The electronic documentation should be sent to ec.verifications-des-emissions-emissions-verification.ec@canada.ca.

Environment and Climate Change Canada's email message size limit is 20 megabytes. If the submission exceeds this limit, it is recommended that the submission be separated into parts and sent in multiple emails. Companies are also able to use their account on the Vehicle and Engine Emissions Reporting Registry (VEERR) or contact us to obtain one. Alternatively, the submission can be provided on a CD or USB stick and sent by courier to:

Vehicle and Engine Testing and Emission Verification
Transportation Division

Energy and Transportation Directorate
Environmental Protection Branch
Environment and Climate Change Canada
335 River Road South
Ottawa, Ontario, K1V 1C7

When a company submits information for a test group for which an identical submission was received and acknowledged by the Minister the previous year, the company should notify the Minister that the submission is a direct carry-over to facilitate the process.

In cases where a company is providing submissions for more than one test group, it would be helpful if it stated the order in which it would prefer the Minister to process them.

5.4.1 Confidential information

When a company submits evidence of conformity to the Minister, the company is responsible for identifying which information in the submission is confidential. That information will be dealt with in accordance with the law. This includes but is not necessarily limited to the Access to Information Act which is available at: http://laws-lois.justice.gc.ca/eng/acts/A-1/index.html and the Privacy Act that is available at: http://laws-lois.justice.gc.ca/eng/acts/P-21/index.html.

5.5 Response from Environment and Climate Change Canada

An acknowledgement will be sent to the company who submitted the evidence of conformity once a review has been completed and the information is considered to be “in a form and manner satisfactory to the Minister.” This acknowledgement does not relieve the company of the obligation to comply with all applicable requirements under the CEPA and the Regulations. The letter only provided acknowledgment that we received the letter.

Environment and Climate Change Canada will strive to respond to submissions according to the timelines shown in the table below, but incomplete submissions may cause delays beyond the time given in the table. When information is found to be missing the wait time to receive additional information will be added to the processing time listed below.

Table 2: Processing times for evidence of conformity

Type of Submission	Processing Times[5]
35(1) Covered & sold concurrently	Confirmation of receipt of submission: 15 calendar days after date of reception
35(1) Covered & NEM	Confirmation of receipt of submission: 15 calendar days after date of reception
35(1.1) Covered	Confirmation of receipt of submission: 15 calendar days after date of reception
35.1 Equivalent	Satisfactory to minister letter: 30 calendar days after date of reception
36 Canada-unique	Confirmation of receipt of submission: 15 calendar days after date of reception Satisfactory to Minister letter: 60 calendar days after date of reception

5.6 Contact information

For any questions or inquiries related to the evidence of conformity, please contact the Vehicle and Engine Testing and Emission Verification Section, of Environment and Climate Change Canada's Transportation Division.

Email: ec.verifications-des-emissions-emissions-verification.ec@canada.ca

In addition to the evidence of conformity, there are other regulatory obligations covered under the Regulations. For any other regulatory inquiries or further information regarding other administrative requirements, such as Importation Declarations and End of Model Year Reports, please contact Environment and Climate Change Canada's Transportation Division.

Email: ec.infovehiculeetmoteur-vehicleandengineinfo.ec@canada.ca

[5] Missing information will increase the processing by the amount of time taken to complete the missing information

6.0 References

Below is a list of references relevant to evidence of conformity that are discussed in this document.

Canadian Environmental Protection Act, 1999:
http://laws-lois.justice.gc.ca/eng/acts/C-15.31/index.html

On-Road Vehicle and Engine Emission Regulations:
http://laws-lois.justice.gc.ca/eng/regulations/SOR-2003-2/index.html

United States Code of Federal Regulations, Title 40:
http://www.ecfr.gov/cgi-bin/text-idx?SID=4e9f7c1f87d7edf83f8c6fe353ba4f8a&tpl=/ecfrbrowse/Title40/40tab_02.tpl

Environment and Climate Change Canada's CEPA Environmental Registry:
https://www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry.html

United States Environmental Protection Agency : Certification Application Reporting Guidance
https://iaspub.epa.gov/otaqpub/display_file.jsp?docid=33582&flag=1

Appendix A – Example of an EPA certificate

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
2020 MODEL YEAR
CERTIFICATE OF CONFORMITY
WITH THE CLEAN AIR ACT

OFFICE OF TRANSPORTATION
AND AIR QUALITY
ANN ARBOR, MICHIGAN 48105

Certificate Issued To:	**Effective Date:**		**Issue Date:**
Certificate Number:	**Expiration Date:**	**Byron J. Bunker, Division Director** **Compliance Division**	**Revision Date:**

Test Group Name:	**Engine Displacement:**
Evaporative/Refueling Family Name:	**Exhaust Emission Test Fuel Type:**
Applicable Exhaust Emission Standards:	**Full Useful Life Miles: Exhaust Emissions:**
Applicable Evaporative/Refueling Standards:	**Full Useful Life Miles: Evaporative/Refueling Emissions:**
Models Covered:	

Pursuant to section 206 of the Clean Air Act (42 U.S.C.7525) and 40 CFR Parts 85, 86, 88, 600, 1037, 1065, and 1066 as applicable, this certificate of conformity is hereby issued with respect to test vehicles which have been found to conform to the requirements of the regulations on Control of Air Pollution from New Motor Vehicles and New Motor Vehicle Engines (40 CFR Parts 85, 86, 88, 600, 1037, 1065, and 1066 as applicable) and which represent the new motor vehicle models listed above by test group and evaporative/refueling emission family, more fully described in the application of the above named manufacturer. Vehicles covered by this certificate have demonstrated compliance with the applicable emission standards as more fully described in the manufacturer's application. This certificate covers the above models, which are designed to meet the applicable emission standards specified in 40 CFR Parts 85, 86, 88, 600, 1037, 1065, and 1066 as applicable at both high and low altitude as applicable.

EPA is issuing this certificate subject to the conditions and provisions of 40 CFR 86.1848(c), and 40 CFR 1037 as applicable.

This certificate covers only those new motor vehicles or vehicle engines which conform, in all material respects, to the design specifications that apply to those vehicles or engines described in the documentation required by 40 CFR Parts 85, 86, 88, 600, 1037, 1065, and 1066 as applicable and which are produced during the 2020 model year production period stated on this certificate of the said manufacturer, as defined in 40 CFR Parts 85, 86, 88, 600, 1037, 1065, and 1066 as applicable. The manufacturer shall obtain the approval of the California Air Resources Board (in the form of an executive order issued by the California Air Resources Board) prior to introducing any vehicle covered by this certificate into commerce 1) in the State of California, or 2) in a State that, under the authority of Section 177 of the Clean Air Act, has adopted and placed into effect the California standards to which this test group has been certified.

Catalyst-equipped vehicles designed to be operated on gasoline or flexible fuel are equipped with an emission control device which the Administrator has determined will be significantly impaired by the use of leaded fuel. This certificate is issued subject to the conditions specified in 40 CFR 80.24. Catalyst-equipped vehicles designed to be operated on gasoline or flexible fuel, otherwise covered by this certificate, which are driven outside the United States, Canada, Mexico, Japan, Australia, Taiwan and the Bahama Islands will be presumed to have been operated on leaded fuel resulting in deactivation of the catalysts. If these vehicles are imported or offered for importation without retrofit of the catalyst, they will be considered not to be within the coverage of this certificate unless included in a catalyst control program operated by manufacturer or a United States Government Agency and approved by the Administrator.

In the case of completely assembled vehicles, this certificate of conformity covers only vehicles which are completely manufactured prior to January 1, 2021. Normally incompletely assembled vehicles (such as cab chassis) may be completed after this date, provided that the basic manufacturing (including installation of the emission control system) was completed prior to January 1, 2021. This certificate does not cover vehicles sold, offered for sale, or introduced, or delivered for introduction, into commerce in the U.S. prior to the effective date of the certificate.

Appendix B – Example of a Letter Demonstrating that the NEM is Affixed

[*Company Name*]

[*Insert Date*]

Director, Transportation Division
Energy and Transportation Directorate
Environmental Protection Branch
Environment and Climate Change Canada
351 St. Joseph Blvd.
Gatineau, Québec, K1A 0H3

Subject: Proof that the vehicles covered by the EPA certificate bears the NEM for 20XX model year [V*ehicle Make Model*] (Test Group: [*Test Group Name*]).

Dear Director:

[*Company Name*] has been authorized by the Minister of Environment and Climate Change to apply the National Emissions Mark (NEM) to their on-road vehicle, as per section 151 of the CEPA and section 8 of the ORVEER. The authorization number assigned by the Minister to [*Company Name*] is [*Authorization Number*].

[*Company Name*] attests that all vehicles in the above referenced test group, manufactured in, or imported into Canada, are affixed with the NEM.

As the signatory of this letter, I, [N*ame*], certify that I am authorized to act on behalf of [*Company Name*] concerning the 20XX [*Vehicle Model*]. Should you have any questions in regard to the information provided, please contact [*Name, Position and Company Name*].

[*Signature*]

[*Insert Name*]
[*Position*]
[*Contact Information*]

Appendix C – Example of a Statement of Compliance Letter (for Vehicles Equivalent to a Vehicle Covered by an EPA Certificate as per Section 35.1)

[*Company Name*]

[*Insert Date*]

Director, Transportation Division
Energy and Transportation Directorate
Environment and Climate Change Canada
351 St. Joseph Blvd.
Gatineau, Québec, K1A 0H3

Subject: Submission of Evidence of Conformity pursuant to the On-Road Vehicle and Engine Emission Regulations (ORVEER) and the Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations (PALTGGER) for the 20XX model year [*vehicle make and model*] (Test Group: [*test group*] EVAP Family: [*evaporative family*]).

Dear Director:

[*Company Name*] intends to sell a 20XX model year [*Vehicle Make and Model*], in Canada. Evidence of conformity is being submitted as per section 35.1 of the ORVEER and section 36 of the PALTGGER. The subject vehicle model is not covered by a certificate of conformity issued by the U.S. Environmental Protection Agency, but it may be considered equivalent to a vehicle listed on a valid EPA certificate (attached), as per section 19.1 of the ORVEER.

Standards to which the vehicle conforms:

Exhaust Emission Standards & Useful Lives	**Evaporative Emission Standards & Useful Life**
LD[XX] Tier[X] (Bin Y) – XXX,XXX miles *Pollutant Specific Emission Standards:* *PM :* Tier[X] - XXX,XXX miles *SFTP NMOG+NOx FEL :* XXX g/mi *Cold NMHC FEL :* XXX g/mi *CH_4:* XXX g/mi *N_2O:* XXX g/mi	Tier [X] – XXX,XXX miles FEL: X.XXX grams

The equivalent vehicle has the same emission control features as the vehicle tested to obtain the EPA certificate and has no features that could cause it to have a higher level of emissions than that certified vehicle.

[*Company Name*] attests that all vehicles of this test group comply with all applicable standards set out in the ORVEER and the PALTGGER made under the Canadian Environmental Protection Act, 1999. Attached, please find [*Company Name*]'s evidence of such conformity, including a detailed description of the subject vehicles. [*Company Name*] also attests that the vehicles of this test group are manufactured

to the same specifications as those set out in the evidence of conformity and will be affixed with an appropriate vehicle emission control information label.

[*Company Name*] requests that Environment and Climate Change Canada acknowledge that the attached evidence of conformity has been obtained and produced in a form and manner satisfactory to the Minister.

As the signatory of this letter, I, [*Name*], certify that I am authorized to act on behalf of [*Company Name*] concerning the 20XX [*Vehicle Model*]. Should you have any questions in regard to the information provided, please contact [*Name, Position and Company Name*].

[*Parts* (as listed)] of the information supplied in this package is classified as confidential.

[*Signature*]

[*Insert Name*]
[*Position*]
[*Contact Information*]
Encl.

Appendix D – Example of a Comparison Table for Equivalent Vehicles

The following table is an example of the information required to demonstrate that a vehicle could be equivalent to a model that is specifically listed on an EPA certificate.

Comparison Table for Equivalent Vehicles		
	EPA Certificate Model	**Canadian Model**
Make		
Model		
Body Style		
EPA Certificate Number		N/A
Test Group		
Evaporative/Refueling Family		
Test Group Criteria		
1. Durability Group		
a) Combustion Cycle (e.g., 2-stroke, 4-stroke, Otto Cycle, Diesel Cycle, Dedicated Electric)		
b) Engine Type (e.g., piston, rotary, air-cooled, water-cooled, Electric)		
c) Fuel Used (e.g., gasoline, diesel, methanol, ethanol, CNG, LPG, flex-fuel, Electric)		
d) Basic Metering System (e.g., throttle body injection, port injection, CNG fuel mixer) or Battery Type (e.g.,Lithium-Ion, NiMH)		
e) Catalyst Construction (e.g., beads, monolith)		
f) Precious metal composition of the catalyst by type of principal active material (e.g., platinum based ox-cat, palladium based ox-cat, platinum and rhodium 3-way cat, palladium and rhodium 3-way cat, platinum and palladium and rhodium 3-way cat)		
g) Catalyst Grouping Statistic (GS) or other criteria (40 CFR 86.1820-01(b)(7)(i) or (ii))		
h) Other Durability Grouping strategy (based on 40 CFR 86.1820-01(c), (d), or (e)		
2. Engine Displacement (within 15 percent or 50 in^3, whichever is larger) or Electric Motor capacity (kW)		
3.Electric vehicle range in the case of BEVs or PHEVs		
4. Number of cylinders or combustion chambers		
5. Arrangement of cylinders or combustion chambers (e.g., in-line V, horizontally opposed) or Type and Voltage of Electric Motor		
6. Emission standards (same or more stringent)		
Other: Grouping criteria based on 40 CFR 86.1827-01(b), (c), (d), (e) or (f)		
Evaporative/Refueling Family Criteria (For gasoline-, ethanol-, methanol-, liquefied petroleum gas-, and natural gas-fueled vehicles)		
1. Type of vapor storage device (e.g., canister, air cleaner, crankcase)		
2. Basic Canister Design		
a) Working capacity (within a 10 gram range)		

b) System configuration (Number of canisters, method of connection (e.g., series or parallel))		
c) Canister geometry, construction and materials		
3. Fuel system		
4. Type of refueling emission control system (e.g., integrated or non-integrated with evaporative control system		
5. Fillpipe sealing mechanism (e.g., mechanical, liquid, other)		
6. Vapor control system or method of controlling vapor flow through the vapor line to the canister (e.g., type of valve, vapor control strategy)		
7. Purge control system (e.g., type of valve, purge control strategy)		
8. Vapor hose material		
9. Fuel tank material		
Other: Grouping criteria based on 40 CFR 86.1821-01(c), (d), or (e)		
Statements:		
The equivalent vehicle described above has the same emission control features as the vehicle tested to obtain the EPA certificate and has no features that could cause it to have a higher level of emissions than that certified vehicle.		
Our Company has access to all records submitted to the EPA in support of the application for the issuance of the EPA certificate.		
Comments / Additional Information:		

Appendix E – Example of a Statement of Compliance Letter (For Vehicles Not Covered by an EPA Certificate or Not Sold Concurrently in Canada and the United States)

[*Company Name*]

[*Insert Date*]

Director, Transportation Division
Energy and Transportation Directorate
Environment and Climate Change Canada
351 St. Joseph Blvd.
Gatineau, Québec, K1A 0H3

Subject: Submission of Evidence of Conformity pursuant to the On-Road Vehicle and Engine Emission Regulations (the ORVEER) and the Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations (PALTGGER) for the 20XX model year [Vehicle Make and Model] (Test Group: [Test Group Name] EVAP Family: [Evaporative Family Name]).

Dear Director:

[*Company Name*] intends to sell a 20XX model year [*Vehicle Make and Model*], in Canada. Evidence of conformity is being submitted as per [*Subsection 35(1.1) OR Section 36*] of the ORVEER and section 37(1) of the PALTGGER. The subject vehicle model [*Is Covered OR Is Not Covered*] by a certificate of conformity issued by the U.S. Environmental Protection Agency.

Standards to which the vehicle conforms:

Exhaust Emission Standards and Usefull Life	**Evaporative Emission Standards and Useful Life**
LD[XX] Tier[X] (Bin Y) – XXX,XXX miles *Pollutant Specific Emissin Standards:* *PM* Tier[X] - XXX,XXX miles *SFTP NMOG+NOx FEL : XXX g/mi* *Cold NMHC FEL : XXX g/mi* *CH_4: XXX g/mi* *N_2O: XXX g/mi*	Tier [X] – XXX,XXX miles FEL: X.XXX grams

[*Company Name*] attests that all vehicles of this engine family comply with all applicable standards set out in the On-Road Vehicle and Engine Emission Regulations and the Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations made under the Canadian Environmental Protection Act, 1999. Attached, please find [C*ompany Name*]'s evidence of such conformity, including a detailed description of the subject vehicles. [*Company Name*] also attests that the vehicles of this test group are manufactured to the same specifications as those set out in the evidence of conformity and will be affixed with an appropriate vehicle emission control information label.

[*Company Name*] requests that the Minister of Environment and Climate Change Canada acknowledge that the attached evidence of conformity has been obtained and produced in a form and manner satisfactory to the Minister.

As the signatory of this letter, I, [*Name*], certify that I am authorized to act on behalf of [*Company Name*] concerning the 20XX [*Vehicle Model*]. Should you have any questions in regard to the information provided, please contact [*Name, Position and Company Name*].

[*Parts* (as listed)] of the information supplied in this package is classified as confidential.

[*Signature*]

[*Insert Name*]
[*Position*]
[*Contact Information*]
Encl.

Appendix F – Technical Information Requirements

Heading	Requirements	Comments	Location found (TEMP)
Cover Page	Model year	*Identify the model year.*	
	Make, models and carlines	*Identify the make(s) and model(s) covered by the submission.*	
	Durability Group Name	*Alpha numeric code to identify the Durability Group for the vehicle.*	*Previous EC guidance document*
	Test Group name	*Identify the test group.*	
	Evaporative family name	*Identify the evaporative family.*	
	Brief description of durability group	*Provide a brief description of the durability group (e.g. combustion cycle, fuel type, catalyst code, etc.)*	*Previous EC guidance document*
	Brief description of test group	*Provide a brief description of the test group (e.g., engine displacements, fuel delivery system, emission control systems, catalyst type, oxygen sensor config., etc.).*	
	Vehicle Class	*LDV,LDT,HDV, etc.*	
	Applicable standards, including but not limited to: exhaust, greenhouse gas, evaporative/refueling or any interim in use standards.	*Identify exhaust and evaporative emission standards applicable to the test group, (including CH_4, N_2O and FELs when applicable). Indicatice if vehicle is Tier 3 or Interim Tier 3 compliant.*	
	Applicable useful life	*Identify the useful life of the test group, and evaporative family.*	
	Vehicles tested (EDVs)	*List each vehicle identity and configuration number tested and the corresponding test type(s) for each*	

Heading	Requirements	Comments	Location found (TEMP)
		combination. Include data for any carry over EDVs.	
	Company name	*Identify the company's name (See definition in CEPA 1999, section 149).*	
	Vehicle manufacturer	*Identify the vehicle's original equipment manufacturer name.*	
Laboratory Accreditation	Provide the name and address of the laboratory where accreditation testing was carried out. Also include the accreditations of the laboratory where the testing was performed. The laboratory where the tests are carried out would have to be capable of certifying to Canadian or U.S. standards	This is normally demonstrated by the lab having previously completed testing to support the issuance of a U.S. EPA certificate. View the list of Environmental Laboratory Accredition programs	
Section 1 – Correspondence and Communications	Identify person(s) both within and outside the company authorized to be in contact with staff from the Transportation Division of Environment and Climate Change Canada and who may be contacted with regards to the submission. Identify areas of responsibility for each person listed, if applicable.		
	Name of company	*Provide the company's name.*	
	Address of company	*Provide the company's postal address.*	
	Company representative(s)	*Provide the representative's name, including title/position and their individual area of responsibility.*	
	Representative address	*Provide the representative's postal address, if different than listed above.*	
	Email address	*Provide the representative's email address.*	

Heading	Requirements	Comments	Location found (TEMP)
	Phone number	*Provide the representative's phone number.*	
Section 2 – Durability Group Description	Durability group name	*Provide durability group name.*	
	Combustion cycle or indicate that vehicle is a hybrid, fuel cell or dedicated electric vehicle.	*e.g. four stroke- Otto cycle, compression ignition, etc.*	
	Engine type or type of electic motor	*e.g. piston, rotary, DC brushless, etc.*	
	Fuel used or battery type (including cell chemisty)	*e.g. gasoline, diesel, Nickel Metal Hydride, etc.*	
	Basic fuel metering system	*e.g. multi-port fuel injection, direct fuel injection, etc.*	
	Catalyst construction and general location	*e.g. ceramic monolith, etc.*	
	Precious metal composition of the catalyst by the type of active material(s) used	*e.g. palladium based oxidation catalyst, platinum and rhodium three way catalyst, etc.*	
	Precious metal loading for all catalysts in the durability group	*As defined in paragraph 86.1820-01(b)(7)(i)(A) of the CFR*	
	Range of Catalyst Grouping Statistics	*Provide if applicable*	*1820-01(b)(7)(i)*
	Durability Data Vehicle (DDV) Description	*Specify which vehicle was used for testing, and its applicable configuration number.*	
	Test Groups included in Durability Group	*List all test groups.*	
Section 3 – Evaporative/Refuelling Family Description	Evaporative/refuelling family name	*Provide name of evaporative/refuelling family.*	
	Schematics or general descriptions	*May be placed in the commons section.*	
	Evaporative/Refueling Family Parameters including: • Type of vapour storage device	As specified in 40 US CFR §86.1821	*40 CFR §86.1821-01*

Heading	Requirements	Comments	Location found (TEMP)

	• Basic canister design
	  ○ Working capacity
	  ○ System configuration
	  ○ Canister geometry (construction and material)
	• Fuel system
	• Type of refueling emission control system (integrated or non-integrated)
	• Fillpipe seal mechanism
	• Vapour control system or method for controlling vapour flow through the vapour lines to canister
	• Purge control system
	• Vapour hose material
	• Fuel tank material
	• Evaporative emission standard or family emission limit (FEL)		

Section 4 – Durability Procedure Description	Provide the following information for all Emission Data Vehicles (EDVs)		
	Durability group	*Provide the name of the durability group.*	
	Amount of aging required and performed		
	Description of exhaust durability procedure	*Procedure used as specified in §86.1823 as well as the equivalency factor required to be calculated in §86.1823-08(e)(1)(iii)(B) if applicable*	
	Description of evaporative/refuelling durability procedure	*Procedure used as specified in §86.1824 and §86.1825*	
	Deterioration factor list, calculated to full or intermediate useful life as applicable.	*If listed in Section 7 - Test Results, those locations may be referenced in lieu*	

Heading	Requirements	Comments	Location found (TEMP)
		of tabulating deterioration factors in Section 4.	
	Indicate whether additive or multiplicative DF's are used	*Specify deterioration factor as either multiplicative or additive.*	
	Indicate if aged components were used	*Specify if aged components were used to determine certification levels.*	
Section 5 – Test Group Description	Test group name	*Provide the name of the test group. See Appendix H for test group naming convention.*	
	Engine displacements covered	*List all which apply.*	
	Arrangement and number of cylinders or combustion chambers	*e.g. V6, I4, etc.*	
	Vehicle class(es) covered	*e.g. LDV, LDT1, LDT2, etc.*	
	Emission standards class	*e.g. Tier 3, Interim Tier 3, etc.*	
	Applicable emission standards	*e.g. Bin 0, Bin 125, etc.*	
	A manufacturer of hybrid electric vehicles must create separate test groups based on type of battery technology employed and upon features most related to their exhaust emission characteristics.	*Refer to* 40 US CFR §86.1827-01(e).	
	A manufacturer of electric vehicles is required to create separate test groups based on: • Type of battery technology; • Storage capacity and voltage of battery; • Voltage, type and size of electric motor; and • Any other parameters used by the manufacturer to classify vehicles into test groups.	*Refer to* 40 US CFR §86.1827-01(f)	
	Provide the following information for all emission data vehicles covered by this test group.		

Heading	Requirements	Comments	Location found (TEMP)
Section 6 – Test Vehicle Description	Vehicle identification numbers	*VIN, test vehicle number and configuration number*	
	Test group and evaporative family		
	Provide justification as to why vehicle chosen as test vehicle is representative of the worst case scenario.	*A detailed description as to why the chosen test vehicle will have the highest level of emissions over other vehicles of the same test group or evaporative emission family.*	
	Tests performed	*Identify which tests were performed (e.g. EVAP/Refueling, Cold CO, SFTP, etc.).*	
	US EPA Certification and Fuel Economy Information System (CFEIS) or VERIFY vehicle information	*Provide printouts of all that apply.*	
	Basic vehicle description	*Include the make, model, model year, drive source, fuel system, and vehicle layout (e.g. 4-door sedan)*	
	Engine code		
	Engine displacement or size/capacity of electric motor		
	Number of cylinders		
	Valves per cylinder		
	Rated horsepower or kW	*In hp for conventional engines or kW for electric vehicles*	
	Curb weight		
	Equivalent test weight (ETW)		
	Gross weight		
	If there are multiple fuels, indicate if they are stored separately or together		
	If there are multiple fuels, indicate if they are combusted together or separately		

Heading	Requirements	Comments	Location found (TEMP)
	Indicate if vehicle is equipped with a rechargeable energy storage system	*List the type and describe the system*	
	Indicate if the vehicle is capable of off board charging		
	Tire size		
	Transmission type and number of gears		
	Axle ratio		
	N/V Ratio	*Range of values acceptable*	
	Emission Control System	*List all exhaust emission related components (e.g. air injection pump, detonation sensor, three-way catalyst, oxygen sensor, etc.). Indicate catalyst preheating method, if applicable.*	
	Vehicle drive mode while testing	*Indicate if vehicle is to be tested in a selectable driving mode such as sports, dyno mode, etc.*	
	Aged emission components	*Identify if aged emission control components were installed on the EDVs*	
	Main fuel tank capacity or battery energy capacity	*Specify in Liters for combustion fuels or kWh for electric vehicles.*	
	Battery type if applicable	*Lithium Ion, NiMH, etc.*	
	Dynamometer Target force coefficients		
	Dynamometer Set force coefficients		
	Road Load Horsepower		
	Turbo/Supercharger	*Indicate which is installed, if applicable.*	
	Identify if vehicle is equipped with air conditioning	*If applicable*	
Section 7 – Test Results	Official test results (listing all applicable constituents) on all test vehicles which are applicable to this submission.	*A comprehensive list of all test results and the applicable intermediate (if applicable) and full*	

Heading	Requirements	Comments	Location found (TEMP)
		useful life emission standards to which the test group is deemed to comply with as specified in sections 11 through 13 of the ORVEER and sections 8 through 12 of the PALTGGER. At least one separate sheet of results should be provided for each test performed (e.g. HWFCTE, Cold FTP, Federal fuel 2-day exhaust, USO6, SCO3, ORVR, etc.). U.S. EPA CFEIS or VERIFY CSI PDFs are acceptable, if all required information is included and if available.	
	Standards for pollutants for which testing is waived (see section 8 of this appendix) and interim in-use standards	*Include all emission standards for which a manufacturer is using compliance statements in lieu of testing and any interim in-use standards that are applicable.*	
	Calculation and list of the emission levels for each constituent	*For each emission constituent tested and for each odometer level which requires reporting, the company must show the measured test result, the deterioration factor used, indicate if it is Multiplicative or Additive, indicate the useful life in which it complies, the upward and downward adjustment factors (if applicable), list the calculated emission level and also list the emission*	

Heading	Requirements	Comments	Location found (TEMP)
		standard value it is being measured against, including the applicable Tier and Bin numbers.	
	NMOG/NMHC ratio	*When applicable, specify how NMOG values were calculated as described in 40 CFR 1066.635.*	
	Indicate EDV used for each test performed	*Identify the EDV used for each test performed.*	
	Indicate test fuel used for each test performed	*Identify test fuel used for each test performed. Also identify the method of accounting for ethanol in determining evaporative emissions for gasoline fueled vehicles.*	
Section 8 – Emission Emission Compliance Statements (in lieu of conducting emission testing)	Subsections 1806, 1810 and 1829 of Title 40, chapter I, subchapter C, part 86, subpart S, of the of the CFR describes general testing procedures and includes several provisions allowing for statements of compliance instead of testing in certain circumstances. Please refer to these subsections of the CFR for the appropriate compliance statements as applicable. Below are examples of some of the emission data vehicle compliance statements which may be submitted.		
	Gasoline or methanol fueled particulate matter	*Indicate what approach is being followed to comply with PM phase in standards and if the test group is included in the percentage of vehicles required to meet Tier 3 PM standards under section 17 of the ORVEER. If vehicle is*	*CFR and ORVEER*

Heading	Requirements	Comments	Location found (TEMP)
		covered by an EPA certificate, include appropriate statement per 40 US CFR §86.1829-15(d)(1) or (d)(2) or (d)(3).	
	High altitude Exhaust/Evaporative	*If applicable. As per 40 US CFR §86.1829-15(c)*	*CFR*
	Formaldehyde Emissions	*If applicable. May provide a statement that vehicles comply with the applicable formaldehyde standard instead of submitting test data. As per 40 US CFR §86.1829-15(d)(4).*	*CFR*
	N_2O Emissions	*If applicable. Prior to MY 2019, may provide a statement that vehicle complies to applicable standards instead of measuring N_2O emissions. As per 40 US CFR §86.1829-15(d)(6). Also must indicate which standard under PALTGGER 10(1) that N2O complies.*	*CFR*
	Refueling emission standard for diesel, natural gas or LPG fueled vehicles	*If applicable. May provide a statement that vehicle complies to applicable standards instead of submitting test data for refueling standards. As per 40 US CFR §86.1829-15(e)(1),(2)&(3).Note that natural gas vehicles must meet the refueling connection requirements of 40 CRF 86.1813-17(f)(1).*	*CFR*

Heading	Requirements	Comments	Location found (TEMP)
	Evaporative emission standard for natural gas or LPG fueled vehicles	*If applicable. May provide a statement that vehicle complies to applicable standards instead of submitting test data for evaporative standards. As per 40 US CFR §86.1829-15(e)(2)&(3).*	*CFR*
	Leak Standard	*If applicable. May provide a statement that vehicles not tested in a given model year comply with the leak standard in §86.1813 instead of submitting test data. As per 40 US CFR §86.1829-15(e)(4).*	*CFR*
	Fuel Spitback	*If applicable. May provide a statement that vehicles comply with the fuel dispensing spitback standard instead of submitting test data. As per 40 US CFR §86.1829-15(e)(5).*	*CFR*
	Supplemental Two-Diurnal Test Sequence	*If applicable. In lieu of testing for supplemental two-diurnal test sequence, may provide a statement that vehicles comply. As per 40 US CFR §86.1829-15(e)(6).*	*CFR*
	Refueling test for incomplete class 3 HD vehicles or complete class 3 HD vehicles with fuel tanks exceeding 35 gallons nominal capacity.	*Company may provide a statement as per 40 US CFR §86.1829-15(e)(9).*	
	OBD Compliance Statement	*The company must state that the OBD system complies with the On-Road Vehicle and Engine Emission Regulations. If*	

Heading	Requirements	Comments	Location found (TEMP)
		available, a US EPA or CARB letter indicating OBD system approval without deficiencies could be included.	
	Electric Vehicles and Fuel Cell Vehicles	*Manufactureres may provide a statement that vehicles powered solely by electricity comply with all the requirements of this subpart instead of submitting test data as per 40 US CFR §86.1829-15(f).*	
	91 RON Fuel Testing	*A company must provide a statement that the knock sensor is not a defeat device when vehicles are tested with RON 91 test fuel (as per EPA Guidance VPCD-97-01).*	
	US06 SFTP A/F ratio lean best torque	*Include a statement that vehicles covered under will comply with the requirements of 40 US CFR 86.1811-17(d)(1) and include an explanation for any conditions where additional enrichment is required to protect the engine or emission control system as per 40 CFR 86.1844-01(d)(11)(iii).*	
	Leak free exhaust statement	*Include a statement of compliance that exhaust system is designed according to 40 CFR 86.1844-01(d)(16). May reference the complete exhaust system.*	

Heading	Requirements	Comments	Location found (TEMP)
		description as per section 16 of this Appendix.	
	20˚F to 86˚F emissions	*Include a statement as per 40 CFR 86.1809-12(e) that no discontinuity exists in emissions of NMOG, CO, CO2, NOx, CH4 or HCHO within the specified temperature range.*	
	Fixed liquid level gauge waiver for testing refueling emissions (LPG vehicles)	*If applicable. As per 40 US CFR §86.1810-09(n).*	
Section 9 – OBD System Description	A description of the functional operation characteristics of the onboard diagnostic system.	*As per 40 US CFR §86.1806-17.*	
	The general method of detecting malfunctions for each emission-related component.	*As per 40 US CFR §86.1806-17.*	
	Statement that no OBD deficiencies exist within test group	*As per paragaph 12(b) of The ORVEER.*	
Section 10 – Description of Alternate-fueled Vehicles	Description of all flexible or dedicated alternate fuel vehicles. May choose to include descriptions of electric fueled vehicles in this section.	*This includes, but is not limited to, the fuel and/or percentage of alternate fuel for all such vehicles if applicable.*	
Section 11 – AECD Description	A list of all auxiliary emission control devices (AECD) installed on any applicable vehicles including the sensed and controlled parameters.	*The detailed description of the AECD should include parameters sensed and controlled, and the expected effect the AECD has on emissions (both on and off-cycle). All AECDs that reduce the effectiveness of the emission control system and therefore require a justification include "lean-oncruise" and "air-conditioner-on" strategies. This information should be*	

Heading	Requirements	Comments	Location found (TEMP)
		supplied in a form that can be easily understood by an engineer skilled in automotive emissions control (e.g. not in computer language). Preferred format is a table listing AECDs (down) and sensed and controlled parameters (across).	
	A detailed justification of each AECD which results in a reduction in effectiveness of the emission control system, and rationale why the AECD is not a defeat device as defined in subsection 11(3) of the ORVEER.	*AECD descriptions and justifications of why they are not defeat devices can be included in a common sections submission. Additionally, manufacturers could include statements in their evidence of conformity as to why an AECD is not a defeat device as per subsection 11(4) of the ORVEER.*	
Section 12 – Description of Vehicles Covered by Certificate and Test Parameters	Carline		
	Model name		
	Vehicle classification	*e.g. LDV, LDT1, etc.*	
	Engine code		
	Number of valves per cylinder		
	Engine displacement		
	Transmission and overdrive		
	Shift light indicator		
	Tire size		
	N/V ratio	*Range of values acceptable.*	
	Equivalent test weight (ETW)	*Range of values acceptable.*	
	Fuel tank volume or Battery Storage Capacity	*Range of values acceptable.*	
	Engine starting procedures		
	Transmission test mode or modes if equipped with a driver		

Heading	Requirements	Comments	Location found (TEMP)
	selectable multimode or select shift type		
	Shift schedules	*If applicable. List EPA shift schedule number and shift speeds.*	
	Dyno loading Information	*Either: (1) Twin roll Dyno DPA (Dyno Power Absorption) and coastdown times, or (2) single roll dyno roadload coefficients, as appropriate; indexed by the vehicle characteristics (models, ETW, tires) covered. Roll diameter will also be required.*	
	Evaporative testing parameters	*i.e. canister loading, running loss fuel tank temperature, etc.*	
	Emission test site cooling fan location		
	Advanced technology system test mode or modes	*e.g. idle start/stop enabled or disabled.*	
	Emission Control System Description		
	Type, number and configuration of catalyst(s)		
	Exhaust Gas Recirculation (EGR) type	*If applicable.*	
	Air pump type		
	Fuel system type		
	Intake air aspiration method		
	Other		
	Advanced Technology Vehicle Description		
	Electric motor size (in kW) and type		
	Indicate if vehicle is equipped with a rechargeable energy storage system	*Battery type and cell chemistry, fuel cell description, etc.*	
	Battery voltage and energy storage capacity		
	Advanced technology test mode or modes	*e.g. idle start/stop enable and disable, etc.*	

Heading	Requirements	Comments	Location found (TEMP)
	Indicate if vehicle is capable of off-board charging		
	Other	*Any additional parameters used by the manufactuer to classify advanced technology vehicles.*	
Section 13 – Projected Sales	Projected Canadian sales for each "Canada-unique" test group and evaporative/refueling family combination.	Please note that the company will still be required to comply with the applicable fleet average requirements and to file an end of model year report no later than May 1 after the end of the model year.	
Section 14 – Request for Certification	Contains a copy of the written request for a review of the evidence of conformity, signed by an authorized representative of the company.	*Include copy of your cover letter. The request must include the statement of compliance.*	
Section 15 –Information Specific to HEVs and EVs	Any additional information regarding the range, starting and recharging procedures, methods for determining battery performance or control system logic for fuel fired auxiliary heaters.	*Include any applicable information as specified in 40 CFR 86.1844-01(d)(15).*	
Section 16 – Exhaust System Design	A statement that the exhaust system has been designed according the the requirements for leak free operation.	*See 40 CFR 86.1844-01(d)(16) for requirements.*	
Section 17 – Name of Agent for Services of Process	May reference the correspondence and communications section ofyour submission.		
Section 18 – Vehicle Emission Control Information (VECI) Label	An image or drawing of the VECI label as it will appear once affixed to the vehicle.	*VECI label requirements are included in Appendix G of this document. Manufacturers may also include a diagram identifying the location of*	

Heading	Requirements	Comments	Location found (TEMP)
		the VECI label on the vehicle.	

Appendix G – VECI Label Requirements

A sample drawing or copy of the Vehicle Emission Control Information (VECI) label must be included in the submission of evidence of conformity for all vehicles that are imported into, or manufactured in Canada and must contain the information provided in this section. The technical information presented on the VECI label should be in English and the compliance statement must be in English and French. The technical information required on the VECI label is consistent to that listed in section 35 of the ORVEER, which references §1807 of Title 40, chapter I, subchapter C, part 86, subpart S, of the of the CFR.

a) A permanent, legible label must be affixed in a readily accessible location. Multi-part labels may be used;
b) The label shall be affixed in such a manner that it cannot be removed without destroying or defacing the label, and shall not be affixed to any part which is easily detached from the vehicle or is likely to be replaced;
c) The label must be resistant to, or protected against, any weather condition;
d) The label must have lettering in block capitals and numerals that are not less than 2 mm in height and must be in a colour that contrasts with the background colour of the label;
e) The label must have units that are identified by the appropriate name or symbol;
f) The label must contain the following information;
    i) The label heading shall read: “Vehicle Emission Control Information”;
    ii) Full corporate name and trademark of the vehicle’s manufacturer (optionally, the name of the Canadian importer may also be included);
    iii) Engine displacement;
    iv) Test group, evaporative/refueling family and applicable exhaust emission standards of family emission limit;
    v) Identification of the exhaust emission control system;
    vi) Minimum fuel octane requirement and engine lubricant requirements; and
    vii) An unconditional statement of conformity: “THIS VEHICLE CONFORMS TO ALL APPLICABLE STANDARDS PRESCRIBED BY THE ON-ROAD VEHICLE AND ENGINE EMISSION REGULATIONS / CE VÉHICULE EST CONFORME À TOUTES LES NORMES QUI LUI SONT APPLICABLES EN VERTU DU RÈGLEMENT SUR LES ÉMISSIONS DES VÉHICULES ROUTIERS ET DE LEURS MOTEURS.” For Type 3 or equivalent if NEM is not affixed.
g) Paragraphs (vi) and (vii) may be excluded if the information is in owner’s manual. In such circumstances, the following statement must be on the label “See owner’s manual for tune-up specifications and fuel / lubricant details”.

In lieu of the compliance statement, a company has the option of affixing the National Emissions Mark (NEM). In that particular situation, the VECI label should also be affixed to provide the necessary technical information (test group, evaporative/refuelling family, engine displacement, exhaust emission control system, etc.). It should be noted that the NEM is generally required for vehicles that are manufactured in Canada. Before affixing the NEM, the company must obtain the authorization of the Minister. For more information on the NEM, please contact Environment and Climate Change Canada's Transportation Division at *ec.infovehiculeetmoteur-vehicleandengineinfo.ec@canada.ca*.

Note that the above requirements shall not prevent a company from also reciting on the label that such vehicles of the test group conform to any other applicable standards for new vehicles or any other information that the company deems necessary for, or useful to, the proper operation and satisfactory maintenance of the vehicle. Below is an example of an acceptable VECI label.

VEHICLE EMISSION CONTROL INFORMATION
[Company Trademark] [Company Name]
TEST GROUP: [ΩΩΩΩC####ΩΩΩ] EVAPORATIVE/REFUELING FAMILY: [ΩΩΩΩPαΩΩΩαΩΩ] EXHAUST EMISSION CONTROL SYSTEM: EXHAUST EMISSION STANDARDS: Tier #, BIN ### ENGINE DISPLACEMENT: [##.#] L FUEL OR ENGINE LUBRICANT REQUIREMENTS: ENGINE TUNEUP SPECIFICATIONS AND ADJUSTMENTS:
*THIS VEHICLE CONFORMS TO ALL APPLICABLE STANDARDS PRESCRIBED BY THE ON-ROAD VEHICLE AND ENGINE EMISSION REGULATIONS / CE VÉHICULE EST CONFORME À TOUTES LES NORMES QUI LUI SONT APPLICABLES EN VERTU DU RÈGLEMENT SUR LES ÉMISSIONS DES VÉHICULES ROUTIERS ET DE LEURS MOTEURS

*If the NEM is affixed, there is no need for the statement of compliance.

Where:
α: are alpha fields
#: are numeric fields
Ω: are alphanumeric fields

Appendix H – Consolidated Naming Convention for Durability Groups, Test Groups and Evaporative/Refueling Family Names

The EPA guidance letter CD-17-10 outlines how to create a test group name, evaporative/refueling family name and durability group name. Vehicles are grouped into test groups based on expected similar emission characteristics, as described in section §1827, 1821 and 1820 of Title 40, chapter I, subchapter C, part 86, subpart S, of the of the CFR .

Durability Group Name

Position	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**
Code	Model Year	EPA or ECCC 3-character manufacturer code			Combustion Cycle Code	Engine Type Code	Fuels Used (8 and 9 are for Second and Third Fuels Used)			Manufacturer Assigned Character to create a unique group name or Manufacturer Assigned Battery Code if applicable	Manufacturer Assigned Character to create a unique group name or Manufacturer Assigned Catalyst Code if applicable	

Position 1: Model Year Codes
Use the list below to select the appropriate model year code for the durability group name.

A – 2010	F – 2015	L – 2020	S – 2025	Y –2030	5 –2035
B – 2011	G – 2016	M – 2021	T – 2026	1 –2031	6 –2036
C – 2012	H – 2017	N – 2022	V – 2027	2 –2032	7 –2037
D – 2013	J – 2018	P – 2023	W –2028	3 –2033	8–2038
E – 2014	K – 2019	R – 2024	X –2029	4 –2034	9–2039

Positions 2-4: EPA 3-character manufacturer code
Insert the 3-character alphanumeric EPA manufacturer code assigned to your company. If your company does not have an assigned EPA manufacturer code, please contact Environment and Climate Change Canada at the contact information found within this document.

Position 5: Combustion Cycle Code

The following table includes position 5 code descriptions for durability group names.

2	Otto Cycle – two stroke
G	Otto Cycle – four stroke
A	Diesel Cycle – two stroke
D	Diesel Cycle – four stroke
E	Dedicated Electric
H	Hybrid Electric with Otto Cycle – four stroke engines (includes PHEVs)
J	Hybrid Electric with Diesel Cycle – four stroke engines (includes PHEVs)
C	Fuel Cell

Position 6: Engine Type Code:
The following table includes position 6 code descriptions for durability group names.

P	Piston
R	Rotary
E	Electric (including fuel cell)
H	Hybrid Electric (including PHEV)
A	Other

Position 7, 8 and 9: Fuels Used
See table below for code descriptions to identify types of fuels used. Position 7 refers to the primary fuel used for the durability group. Positions 8 and 9 refer to second and third fuels used.

G	Gasoline
D	Diesel
M	Methanol
E	Ethanol
C	CNG
L	LNG
P	LPG
V	Electric (from off-board charging)
I	Hydrogen
N	Not Aplicable (for second or third fuels)

Position 10: Manufacturer Specific Character
The character in position 10 are reserved for a manufacturer specific code used to creat a unique durability group name. If applicable, manufacturer may specify a character to identify an Assigned Battery Code.

Position 11 and 12: Manufacturer Specific Character
The Characters in position 11 and 12 are reserved for a manufacturer specific code used to create a unique durability group name. If applicable, manufacturer may specify characters to identify an Assigned Catalyst Code.

Test Group Name

Position	1	2	3	4	5	6	7	8	9	10	11	12
Code	Model Year	EPA or ECCC 3-character alphanumeric manufacturer code			Industry Sector Code	Engine Displacement or Family Type Descriptor				Manufacturer's self-designated code to identify a unique family name.		

Position 1: Model Year Codes
Use the list included with durability group position 1 to select the appropriate model year code for the test group name.

Positions 2-4: EPA 3-character manufacturer code
Insert the 3-character alphanumeric EPA manufacturer code assigned to your company. If your company does not have an assigned EPA manufacturer code, please contact Environment and Climate Change Canada at the contact information found within this document.

Position 5: Industry Sector Codes
For Light-Duty Vehicles and Light-Duty Trucks/Medium Duty Passenger Vehicles, the industry sector code is “J” as per EPA guidance letter CD-17-10. Alternatively the industry code “T” can be used for Light-Duty Trucks or “V” for Light-Duty Vehicles.

Positions 6-9: Engine Displacement
Insert the applicable engine displacement for each engine family. Engine displacement units must be in Liters (##.# or .###) .

Positions 10-12: Sequence Characters
Enter any combination of valid characters in positions 10 through 12 in order to provide a unique identification for a test group name. At a minimum, the sequence characters, in combination with the other characters in the test group name, must provide a unique identifier for each test group name for a manufacturer for each model year. Further, it is recommended that numbers and letters be selected that minimize possible confusion. The sequence characters themselves could be used to represent other information such as the applicable EPA or California emission standards, however Environment and Climate Change Canada will treat these as simple sequence characters with no additional meaning.

Evaporative/Refueling Family Name

Position	1	2	3	4	5	6	7	8	9	10	11	12
Code	Model Year	EPA or ECCC 3-character alphanumeric manufacturer code			Industry Code	Total evap canister working capacity in grams.				Manufacturer's self-designated code for this permeation family		

Position 1: Model Year Codes
Use the list provided with durability group names to select the appropriate model year code for the evaporative/refueling family name.

Positions 2-4: EPA 3-character manufacturer code
Insert the 3-character alphanumeric EPA manufacturer code assigned to your company. If your company does not have an assigned EPA manufacturer code, please contact Environment and Climate Change Canada at the contact information found within this document.

Position 5: Industry Sector Codes
For Light-Duty Vehicles and Light-Duty Trucks/Medium Duty Passenger Vehicles, the industry sector code is “R” as per EPA guidance letter CD-17-10.

Positions 6-9: Canister Total Working Capacity in Grams
The total working capacity of all evap canisters installed on the vehicle, reported in grams.

Positions 10-12: Sequence Characters
Enter any combination of valid characters in positions 10 through 12 in order to provide a unique identification for an evaporative/refueling family name. At a minimum, the sequence characters, in combination with the other characters in the evaporative/refueling family name, must provide a unique identifier for each evaporative/refueling family name for a manufacturer for each model year. Further, it is recommended that numbers and letters be selected that minimize possible confusion.

Examples

Test Group:
JXYLV03.5ABC = Company XYL has a 2018 model 3.5L light duty vehicle
J = 2018 model year
XYL = EPA manufacturer code for XYL corporation
V = Light-Duty vehicle
03.5 = engine displacement of 3.5 L.
ABC = 3-character code which uniquely identifies the engine family name

Evaporative/Refueling Family:
JXYLR0120DEF = Company XYL has a 2018 light-duty evaporative/refueling family with 120 g total working capacity
J = 2018 model year
XYL = EPA manufacturer code for XYL corporation
R = Light-Duty evaporative/refueling family
0120 = 120 grams total working capacityDEF = 3-character code which is used by the manufacturer to uniquely identify the evaporative/refueling family name

Appendix I – Example of a Statement of Compliance Letter for Canada Unique Advanced Technology Vehicles

[*Company Name*]

Director, Transportation Division
Energy and Transportation Directorate
Environment and Climate Change Canada
351 St. Joseph Blvd.
Gatineau, Québec, K1A 0H3

[*Insert Date*]

Subject: Submission of Evidence of Conformity pursuant to the On-Road Vehicle and Engine Emission Regulations (ORVEER) and the Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations (PALTGGER) for 20XX model year [*Vehicle Make and Model*] (Test Group: [*Test Group Name*]).

Dear Director:

[*Company Name*] intends to sell a 20XX model year [*Vehicle Make and Model*], in Canada. Evidence of conformity is being submitted as per [*Subsection 35(1.1) OR Section 35.1 OR Section 36*] of the ORVEER. The subject vehicle model [*Is Covered OR Is Not Covered*] by a certificate of conformity issued by the U.S. Environmental Protection Agency [ONLY FOR 35.1: *, but it may be considered equivalent to a vehicle listed on a valid EPA certificate (attached), as per section 19.1 of the ORVEER*].

Standards to which the vehicle conforms:

Exhaust Emission Standards & Useful Life
LD[XX] Tier[X] (Bin Y) – XXX,XXX miles

[ONLY FOR 35.1: *The equivalent vehicle has the same emission control features as the vehicle tested to obtain the EPA certificate and has no features that could cause it to have a higher level of emissions than that certified vehicle.*]

The above mentioned [*Vehicle Model*] is an advanced technology vehicle and is equipped with a(n) [*HEV, PHEV, EV, FCV*] propulsion system. [*Company Name*] attests that all vehicles of this Test Group comply with all applicable standards set out in the On-Road Vehicle and Engine Emission Regulations and the Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations made under the Canadian Environmental Protection Act, 1999. Attached, please find [*Company Name*]'s evidence of such conformity, including a detailed description of the subject vehicle.

[*Company Name*] also attests that the vehicles of this test group are manufactured to the same specifications as those set out in the evidence of conformity and will be affixed with an appropriate vehicle emission control information label.

[*Company Name*] requests that Environment and Climate Change Canada acknowledge that the attached evidence of conformity has been obtained and produced in a form and manner satisfactory to the Minister.

As the signatory of this letter, I, [*Name*], certify that I am authorized to act on behalf of [*Company Name*] concerning the 20XX [*Vehicle Model*]. Should you have any questions in regard to the information provided, please contact [*Name, Position and Company Name*].

[*Parts* (as listed)] of the information supplied in this package is classified as confidential.

[*Signature*]

[*Insert Name*]
[*Position*]
[*Contact Information*]
Encl.