

Japan's Position Regarding the REESS

Our Position:

Provided the following conditions are ensured, Japan can accept both; to treat as an amendment to R100 or a new Regulation.

-The battery safety requirements on the vehicle crash situation for a part of categories L5-L7 can be developed within the current rule-making time-frame.

or

- Categories L5-L7 are excluded from the scope of this rule-making for the time being.

Justifications:

In Japan, a part of vehicles which are categorized as L5-L7 under UN R.E.3, may be categorized as a "Passenger car" and such vehicles are already required for the crashworthiness performance to ensure the battery safety.

We believe that the safety requirements on the vehicle crash situation of such vehicles should have the same level of performances as required for ordinary passenger cars, depending on the vehicle configuration.

The battery installed on such vehicles should accordingly satisfy the relevant safety requirements defined in accordance with the same philosophy as ordinary passenger cars.

However, the current draft document does not contain the REESS post-crash requirements for such vehicles of categories L5-L7.

We believe that it is necessary to generate common understandings globally established for the philosophy on the crashworthiness, before establishing the technical requirements and test procedures for REESS safety in the event of the collision. However, we are afraid that it would take a long time to resolve such issues and the general discussion of the passive safety requirements would remain open if the REESS safety requirements are established without thorough considerations. Therefore, hasty adoption of the REESS safety requirements in the event of vehicle collision should be avoided, as it will prevent essential discussion of the crashworthiness of such vehicles from being held.

For the reasons mentioned above, Japan would like to propose the removal of categories L5-L7 from the scope of the regulation under discussion, and to establish the requirements focusing on the vehicle categories (L1-L4) on which the demands of regulatory requirements are currently considered as urgent. Japan believes this is the most reasonable and pragmatic solution we can take at this moment.