

**Japan Feedbacks against EC/US/UK proposal
on
Part A and Part B program**

Revision_1
10th September, 2021

52nd EVE IWG Meeting
8th and 10th September, 2021

Japan Positions

Japan accepts EC/US/UK proposal **with the following modifications**

Part A_① ~~Exclude extra operation per customer questionnaire and~~

withdraw and accept the revised text with one modification

~~allow sample exclusion with TAA agreement~~

Slide_3

Part A_② Accept and/or allow to combine with other region verification results

appreciate to incorporate Japan proposal into latest GTR text with one clarification

Part A_③ ~~Increase the factor A (verification threshold) from 5% to 7%~~

withdraw

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Part B_① Delete on-board information of OEM exclusion justification

we need to know how Annex 2 #7 (OEM justification for exclusion) works

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{Annex 2}

Values to be read from each vehicle:

1. SOCE monitor value
2. SOCR monitor value
3. Odometer (in km) <part of drafting issue>
should add virtual odometer
4. Worst case certified energy consumption of PART B family [Wh/km]
5. Total discharge energy in V2X mode [Wh]
6. Last driven for more than 10 km on [Date]
7. OEM justification for exclusion

Part A_①

with one modification

- J** JPN Counter-proposal
Last charged band for more than 50% of nominal capacity
eg. SOC after charged – SOC before charge > 50 %
- DP** DILARA Panagiota (GROW) 2021年7月09日
To be decided. It has implication of having to set codes.
- J** JPN_20210910 4 分前
JPN needs to know how this on-board value works.
It's just up to OEM ?
or plan to define the concrete criteria ?

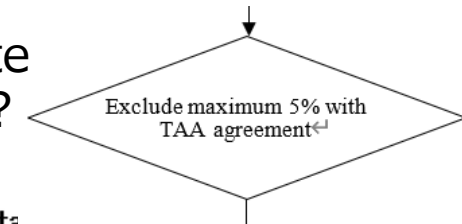
6.4.1. Frequency of verifications

Data shall be collected yearly by the authorities from a statistically adequate sample of vehicles within the same battery durability family. The decision on the number of the vehicles in the sample may be taken by the responsible authority based on risk assessment methodology, but in principle should not be less than [500].

If the number of vehicles in the sample is less than [500], then on the request of the manufacturer, a maximum of 5% of the values might be excluded from the sample. In such a case, the manufacturer needs to provide adequate information on the reason behind the exclusion directly in the values read for each vehicle according to Annex 2.

Part B_① more info. is MUST for further consideration

After confirmation how #7. works, then JPN consider which process is more appropriate #7. or TAA agreement ?



- DP** DILARA Panagiota
This would need a list with codes.
Maybe too much for Phase 1.

Part A_② **with one clarification**

Are EC / UK / CH / US / CA willing to accept the verification results performed in JP ?

6.3.1. Frequency of verifications ←

The manufacturer shall complete the procedure for in-use verification for Part A with a frequency agreed with the authorities, until 5 or 8 years as defined in paragraph 5.2. after the last vehicle of each monitor family is sold and report the results of the verification to the authorities. The authorities may decide to proceed with their own verification of Part A, at a frequency and magnitude based on risk assessment, or request more information from the manufacturers.

With the agreement of all CPs involved, the verification of Part A for vehicles in the same family may be combined between different Contracting Parties. In such cases the relevant Contracting Parties shall be considered as a single authority for the purposes of this verification. |

The-At the option of the Contracting Party, the verification of the monitors shall not be mandatory if the annual sales of the monitor family are less than 5,000 vehicles in the market for the previous year. Such ~~in-service conformity~~ families may still be selected to be tested for Part A, at the request of the responsible authorities.}] ←



DILARA Panagiota (GROW) 昨日

To accommodate the request of Japan to be able to join verification programmes from different CPs ←



JPN_20210910 2 分前

Just clarification ←

Are EC / UK / CH / US / CA willing to accept the verification results performed in JP ? ←

返信 解決