

Email from Japan to RESS Informal Group

Dear Mr. Gerd Kellerman

With respect to your enquiry as to whether this proposal (*Remark: requirements for vehicles of category L*) should be developed as an amendment to R100 or a new Regulation at the 10th RESS group, I would like to communicate the position of the Japanese government as well as my explanatory notes.

Clarifications of Japanese proposal:

In Japan, vehicles which are categorized as L5, 6 or 7 under UN R.E.3 may in some cases be categorized as a "Passenger car".

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

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

Remarks:

According to Japanese legislation, vehicle categorized as L5, 6 or 7 under UN R.E.3 may be applicable to the requirements of "Passenger car" the requirements of "Passenger car" may be applicable to vehicles categorized as L5, 6 or 7 under UN R E3. This is because a vehicle with a cabin, and certain power (engine maximum net power? 0.6 kW or engine displacement? 500 cc) is categorized as "Passenger car". Such a passenger car is required for the crashworthiness performance to ensure the safety of passengers.

However, the current working document for category L 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 consideration. 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, 6, and 7 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.

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 categories L5-7 can be developed within the current rule-making time-frame for L category.

or

- Categories L5-7 are excluded from the scope of this rule-making for the time being.

If categories L5-7 are included in the proposed regulation without thorough consideration, Japan may have difficulties in continuing to adopt R100 from the Japanese legislation standpoint. In particular, if amendment of R100 is to be selected, it may be necessary for Japan to cease the adoption of R100. (We understand this option would not be realistic....)

On the other hand, Japan hopes that the development of the REESS safety requirements in post-crash situation for the categories L5, 6 and 7 would be continued further.

Lastly, as a general opinion, Japan thinks that the requirements for category L which is considered at RESS group is better to manage as a new UN Regulation Japan's opinion is that it would be better to treat the requirements for category L, which is considered at RESS group, as a new UN Regulation, from the viewpoint that there will be less restrictions for further amendments.

Japan indeed understands that the technical requirements for category L should be concluded as soon as possible with an aim to transmit the formal draft text to GRSP in May 2014.

Since we hope to proceed with the rule making for category L smoothly and promptly, we have no intention to hold up this rule making.

However, we would like to propose that the scope be amended.

It would be highly appreciated if you could understand and support our proposal.

Best Regards,
Terunao

Terunao KAWAI , Ph.D.
Deputy Director
Principal Researcher
Automotive Safety Research Dept.
NATIONAL TRAFFIC SAFETY and ENVIRONMENT Lab.
7-42-27 Jindaiji-higashi, Chofu, Tokyo 182-0012, Japan
Tel: +81-422-41-3410 (direct), +81-422-41-3324 (office)
Facsimile: +81-422-76-8603

Japan's Proposal Regarding the REESS

Proposal:

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 categories L5-7 can be developed within the current rule-making time-frame for L category.
- or
- Categories L5-7 are excluded from the scope of this rule-making for the time being.

Justifications:

In Japan, vehicles which are categorized as L5, 6 or 7 under UN R.E.3, may in some cases be categorized as a “Passenger car”.

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

The traction 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 working document for category L 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, 6, and 7 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.