

**PROPOSAL FOR ESTABLISHMENT OF TWO INFORMAL WORKING GROUPS
ADDRESSING THE SAFETY AND ENVIRONMENTAL REQUIREMENTS FOR ELECTRIC
VEHICLES TO ENHANCE REGULATORY COOPERATION INCLUDING DEVELOPING
GLOBAL TECHNICAL REGULATIONS IN THE FRAMEWORK OF THE 1998
AGREEMENT**

A. INTRODUCTION

The proposal for setting up two informal working groups on electric vehicles¹ (EVs) comes at the initiative of the European Commission, DG Enterprise and Industry, the National Highway Traffic Safety Administration and the Environmental Protection Agency in the United States and the Ministry of Land, Infrastructure, Transport and Tourism (MLIT) in Japan, which will act as technical co-sponsors of the groups and of potential UN Global Technical Regulations (GTRs) to be developed. The intention of setting up the groups was announced during the WP.29 plenary session in June 2011.

Through this initiative, the co-sponsors aim to:

- exchange information on current and future regulatory requirements for electric vehicles in different markets,
- minimize the differences between these regulatory requirements, with a view toward facilitating the development of vehicles to comply with such requirements
- where possible, develop common requirements in the form of one or more UN Global Technical Regulations (GTR)

Both working groups should be established under the 1998 Agreement to create the basis for the possible development of a GTR. All global partners are invited to join the groups and share experiences regarding setting relevant regulatory requirements as well as from the market.

The groups aim to replicate the successful approach of the Working Group on Hydrogen & Fuel Cell Vehicles, including the safety (HFCV-SGS) and environmental (HFCV-SGE) subgroups, which facilitated an exchange of information among participants when each party was developing domestic regulatory requirements for hydrogen and fuel cell vehicles and which is now aiming to develop a GTR setting up global safety requirements for hydrogen and fuel cell vehicles.

The technology of electric propulsion is fairly mature, but recent advances in energy storage (batteries, capacitors, flywheels) have largely improved electric vehicles' performance and made them a valid choice for consumers. There is a considerable potential for further developments in automotive energy storage. Electric vehicles, like hydrogen and fuel cell vehicles, represent a promising technology in terms of addressing climate change, improving air quality and cutting oil dependency. The current regulatory pressure to lower CO₂ and

¹ The term and the work in the groups will cover both battery electric (BEV) and hybrid electric vehicles (HEV) (including plug-in hybrids (PHEV)).

pollutant emissions is helping to drive an increasing market penetration of electric vehicles. Furthermore, many governments support the development and deployment of electric vehicles by financing research or offering incentives for consumers. Consequently, the automotive industry is investing in research and development, as well as the production capacity for electric vehicles, at a scale not seen in the past.

Together with support measures for industry development, many governments have already started to define their regulatory framework for electric vehicles - mostly in order to ensure their safety and thus gain consumer confidence -- but also in consideration of environmental performance measures.

Because of the relatively small volume of electric vehicles and their components currently produced, any degree of convergence between regulatory obligations can result in economies of scale and cost reductions for automotive manufacturers – critical in the context of economic recovery and the general cost-sensitiveness of the industry. The objective of the new informal groups is to seek regulatory convergence on a global scale, via the framework of the 1998 Agreement. This avenue of cooperation is particularly interesting in consideration of the fact that the regulatory structure for electro-mobility technologies is currently being developed on both sides of the Atlantic and in Asia, so that there exists an unique opportunity to develop common approaches.

It is also important to note that while electric vehicles are currently on the market and regulators are moving forward with setting applicable technical requirements, the technology is still evolving. This ongoing technology development necessitates a flexible yet solid regulatory framework - one that is performance-oriented, based on the best available data and scientific research and analysis. Cooperation with relevant researchers and technical experts will be a prerequisite for successful operation of the group.

B. AREAS OF WORK IN TWO WORKING GROUPS

The two key topics for the working groups are safety requirements and environmental performance of electric vehicles.² Two separate structures, reporting to GRSP and GRPE respectively, will facilitate organization of the work, nomination of experts and chairs of the meetings.

1. Informal Working Group on Electric Vehicles Safety (EVS)

The aim of this working group is to sponsor an effort to develop one GTR (or more, if appropriate) to address the safety of EVs.³ The GTR would attain equivalent levels of safety for electric vehicles as for conventional gasoline powered vehicles. The GTR would address the unique safety risks posed by EVs and their components, taking into account the actual use in the market. It would be performance-based to the extent possible so as not to restrict future technologies. It should be preceded by an exchange of information on current and future

²The results of the informal working group on Quiet Road Transport Vehicles, expected early 2012, are also acknowledged and will be taken into consideration, if appropriate.

³ The work already accomplished under the 1958 Agreement could be an important input, notably the Regulation 100, 12, 94 and 95 and the results of the RESS informal working group which has been operating since November 2010 and which is scheduled to deliver the results early 2012. Importantly, the start of the work under the 1998 Agreement will not pre-empt any further work on RESS under the 1958 Agreement.

planned regulatory safety requirements for electric vehicles, including the underlying scientific and technical basis and research.

Given that electric vehicle technology is advancing and vehicle manufacturers are planning to produce EVs at higher production volumes in the near future, it is necessary to ensure the occupants are protected, while in use and after a crash event, from electric shocks associated with the high voltage circuits of EVs and from potential hazards associated with lithium-ion batteries and/or other rechargeable energy storage systems (RESS) (in particular, containing flammable electrolyte) during and after a crash event.

The GTR would also set provisions and test protocols to ensure the vehicle system and/or electrical components perform safely, are appropriately protected, and are electrically managed while recharging from external electricity sources, at a residence or other charging location.

The GTR will cover high voltage electrical safety, electrical components such as electric connectors and receptacles, and RESS in particular, containing flammable electrolyte. In addition, the EVS will investigate design, development and production of lithium-based battery technology. The safety provisions will address the safety of electric vehicles, both in-use and post-crash. The key items would be as follows:

a. In-use:

- a) Occupant protection: protection against electric shock
- b) Charging requirements including electric receptacle and connector
- c) Safety requirements for RESS, including battery safety (battery management system, thermal shock, thermal cycling, mechanical shock, overcharge/isolation resistance, over-charge, vibration, fire resistance and short circuit, etc.)

b. Post-crash:

- a) Electrical isolation: protection against electric shock
- b) Battery integrity: battery management system, robustness and survivability
- c) Best practices or guidelines for manufacturers and/or emergency first responders; and
- d) Battery discharge procedures

To the extent possible, the experts of the subgroup will develop the GTR using the following processes:

- Identify potential safety risks specific to EVs taking account of the actual use in the market;
- Develop and evaluate the requirements by reviewing analyses and evaluations conducted to justify the requirements;
- Develop and validate test procedures based on existing evaluations and research; and
- Avoid design-restricted requirements and provisions that are not technically justified.

Finally, this group could also consider the different standards for electro-mobility (e.g. vehicle inlets for which the US and EU industry have expressed interest in a transatlantic standard), based on relevant expertise. Such standards, which are in principle voluntary, could potentially be transformed into regulatory requirements or represent a de facto product

requirement and could also impact safety. Standards are a factor of competitiveness, and harmonized or common standards would likely result in cost savings for industry and society.

Another area for consideration by the group is the standardization of vehicle-to-grid communication, potentially enabling intelligent charging and energy storage on board of the vehicle. At the same time, regulators could look into opportunities offered by meters that could be installed on board of the vehicles. While those standards go outside the scope of the automotive regulations, they may influence some technical requirements (e.g. on RESS) and could therefore be considered by the group.

2. Informal Working Group on Electric Vehicles and Environment (EVE)

The informal working group on Electric Vehicles and the Environment would be an open structure which would enable the exchange of information and experience on relevant policies and regulations. Concerning environmental performance, the general consensus is that electric vehicles have superior environmental performance to conventional vehicles, but the exact method of measurement of emissions and energy efficiency is still not defined under the 1998 Agreement (although there is ongoing work on test-cycle for hybrid electric vehicles in WLTP and HDH groups). While this area is less likely to provide grounds for a GTR, it is important to provide a forum for sharing information about developing techniques for such important considerations such as measuring the energy efficiency of future electric vehicles, battery durability, cold start performance, and recharging performance. Furthermore, application of fuel economy standards to electric vehicles and measurement of upstream emissions could be discussed as well.

Moreover, while investigating the potential for future regulatory action, the informal working group can discuss the related research priorities, current projects and experience in order to foster mutual learning and possibly encourage development of common research projects and definitions. Among the important considerations regarding the environmental aspects of electric vehicles to be examined for potential GTR or other appropriate action might include the methods and procedures necessary to determine the operational, recharging performance of the electric drive system in any given vehicle and end-of-life battery approaches.

With the continuing efforts to foster the development of electro-mobility, there will also be opportunities to share information on issues such as infrastructure build-up, standards for charging infrastructure, support for battery manufacturing, battery recycling and second-life usage, thus bringing together dispersed competences within the global context of WP29.

All of these considerations regarding environmental performance aspects and other issues should be reviewed in the context of the existing work already being conducted by the WLTP, HDH and EFV informal groups. This will enable a clear and discrete development of the terms of reference for the new informal group on environmental performance of EVs.

C. Existing regulations and directives:

At present time there are no regulations concerning electric vehicle safety in the Compendium of Candidates. Consideration of regulations, voluntary standards and guideline documents during development of the GTR regarding safety of electric vehicles should include, but not be limited to, the following:

Regulations and directives:

- United States -- FMVSS 305 - Electric-Powered Vehicles: Electrolyte Spillage and Electrical Shock Protection
- ECE – Regulation 12 – Uniform Provisions Concerning The Approval Of Vehicles With Regard To The Protection Of The Driver Against The Steering Mechanism In The Event Of Impact
- ECE – Regulation 94 – Uniform Provisions Concerning The Approval Of Vehicles With Regard To The Protection Of The Occupants In The Event Of A Frontal Collision
- ECE – Regulation 95 -- Uniform Provisions Concerning The Approval Of Vehicle With Regard To The Protection Of The Occupants In The Event Of A Lateral Collision
- ECE -- Regulation 100 - Uniform Provisions Concerning The Approval Of Vehicles With Regard To Specific Requirements for Electric Power Train
- Japan -- Attachment 101 – Technical Standard for Protection of Occupants against High Voltage in Fuel Cell Vehicles
- Japan -- Attachment 110 – Technical Standard for Protection of Occupants against High Voltage in Electric Vehicles and Hybrid Electric Vehicles
- Japan -- Attachment 111 – Technical Standard for Protection of Occupants against High Voltage after Collision in Electric Vehicles and Hybrid Electric Vehicles
- Japan – Circular notice for test procedures with Hard-In-the-Loop Simulator system to measure fuel efficiency and emission in Electric Hybrid Heavy-duty Vehicles (H19.3.16, KOKU-JI-KAN No.281)
- China -- GB/T 24548-2009 Fuel cell electric vehicles - terminology
- China -- GB/T 24549-2009 Fuel cell electric vehicles - safety requirements
- China -- GB/T 24554-2009 Fuel cell engine - performance - test methods
- Canada -- CMVSS 305—Electric Powered Vehicles: Electrolyte Spillage And Electrical Shock Protection
- Korea -- Motor Vehicle Safety Standard, Article 18-2 – High Voltage System
- Korea -- Motor Vehicle Safety Standard, Article 91-4 – Electrolyte Spillage and Electric Shock Protection

International Industry standards:

- ISO 23273-3 -- Fuel cell road vehicles — Safety specifications — Part 3: Protection of persons against electric shock
- ISO6469 Electrically propelled road vehicles
- ISO 6469-1 (2009) Electrically propelled road vehicles —Safety specifications —Part 1: On-board rechargeable energy storage system (RESS)
- ISO 6469-2 (2009) Electrically propelled road vehicles - Safety specifications -Part 2: Vehicle operational safety means and protection against failures
- ISO 6469-3:2001 Electric road vehicles -- Safety specifications -- Part 3: Protection of persons against electric hazards
- SAE J1766 -- Electric and Hybrid Electric Vehicle Battery Systems Crash Integrity Testing
- SAE J2578 -- General Fuel Cell Vehicle Safety

- SAEJ2929 Electric and Hybrid Vehicle Propulsion Battery System Safety Standard-Lithium -based Rechargeable Cells
- SAEJ2464 Electric and Hybrid Vehicle Rechargeable Energy Storage System (RESS) Safety and Abuse Testing

Environment:

USA: U.S. Code of Federal Regulations (CFR) Title 40: Protection of the Environment; Parts 85, 86, 600 (Light-duty); Parts 85, 86, 600, 1033, 1036, 1037, 1039, 1065, 1066, and 1068 (Medium-, heavy-duty)

EU: Regulation (EC) n° 715/2007 on type approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance

Regulation (EC) n° 595/2009 on type-approval of motor vehicles and engines with respect to emissions from heavy duty vehicles (Euro VI) and on access to vehicle repair and maintenance information

Regulation (EU) No 510/2011 setting emission performance standards for new light commercial vehicles as part of the Union's integrated approach to reduce CO2 emissions from light-duty vehicles

Regulation (EC) n° 443/2009 setting emission performance standards for new passenger cars as part of the Community's integrated approach to reduce CO2 emissions from light-duty vehicles

D. Timeline

- **14-18 November 2011:** World Forum for Harmonization of Vehicle Regulations (WP.29) (155th session) – agreement on establishment of two informal Working Groups on electric vehicles submitted to the AC.3.
- **January 2012:** End of the work of the RESS informal group, its final outcome to be considered in the informal group on EVs safety requirements.
- **January 2012:** feedback of other parties interested to join the group on the proposal.
- **13-16 March 2012:** official adoption of the decision to launch the two informal WG by WP.29 in Geneva, chairs and secretaries are elected.
- **March 2012:** first meetings of the two informal WGs
- **Spring 2012,** adoption of Terms of Reference for each informal WG by the GRPE and GRSP, respectively.

The respective chairs will manage the various aspects of the work ensuring that the agreed action plan is implemented properly and that milestones and timelines are set and met.

- **2012-2013:** meetings of the WG, regular reporting to the Administrative Committee

- **2014:** possible adoption of Global Technical Regulation(s)

