

# Comments on GTR22 amendment

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**95<sup>th</sup> EVE IWG**

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## ➤ Specification format of battery families

Justification : Propose to add the following texts to define the coding rule for each family to share and check the verification results from the other Contracting Parties.

### *Proposal (add new paragraph or new Annex)*

<Possible position to add the texts : new paragraph 6.1.4.>

*Each of the vehicle families specified below shall be attributed a unique identifier of the following format:*

*FT-nnnnnnnnnnnnnnnnn-WMI*

*Where:*

*FT is an identifier of the family type:*

*(a) MF = Monitor family as defined in paragraph 6.1.1.*

*(b) BD = Battery Durability family as defined in paragraph 6.1.2.*

*(c) VD = virtual distance family as defined in paragraph 6.1.3.*

*nnnnnnnnnnnnnnnnnn is a string with a maximum of fifteen characters, restricted to using the characters 0-9, A-Z and the underscore character '\_'.*

*WMI (world manufacturer identifier) is a code that identifies the manufacturer in a unique manner defined in ISO 3780:2009.*

*It is the responsibility of the owner of the WMI to ensure that the combination of the string nnnnnnnnnnnnnnnnn and the WMI is unique to the family and that the string nnnnnnnnnnnnnnnnn is unique within that WMI to the approval tests performed to obtain the approval.*

# ➤ Part A verification result

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Part A test (SOCE accuracy)

=> 3~16 vehicle/monitor family



If the tests need to be done in each region/country, it'll be huge burden for OEM



Part A: SOCE monitor accuracy	
Pass/Fail decision criteria	<p>Monitored value</p> <p>↕ <math>\leq +5\%</math> (statistical judge)</p> <p>Measured value</p>
Sampling volume	<p>N=3~16</p> <p>Test w/vehicle</p>

General Concept of Battery Durability UNRs		region unique	not DONE yet
	Vehicles make business in EU/UK	Vehicles make business in JPN	Vehicles make business in EU/UK and JPN
ISC	R83	JPN Regional	R83
	Part A (conducted by Manufactures) same Part A family	under the consideration to accept EU/UK test results	procure vehicles from EU/UK market
	different Part A family	procure vehicles from EU/UK market	under the consideration to accept EU/UK test results
	procure vehicles from EU/UK market	procure vehicles from JPN market	procure vehicles from EU/UK market
	procure vehicles from EU/UK market		procure vehicles from JPN market

## <GTR22 6.3.1.>

6.3. Part A: Verification of SOCR/SOCE monitors

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 Contracting Parties involved, the verification of Part A for vehicles in the same monitor 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.

Paragraph 6.3.1. states that all vehicles, if belonging to the same monitor family, can be combined between different CPs to avoid additional burden for Authorities and OEMs.

## ➤ Clarification request to CPs that adopted GTR22:

How do CPs/ authorities ensure the exchange of verification data?

# ➤ Part A verification result

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Japan comment

✓ Japan plans to implement the battery durability ISC by regional regulation based on GTR22, not UNR83. (Because Japan doesn't support the ISC concept under the 1958 agreement.)

During the meeting related to implementing UNR (LD Battery Durability)

General Concept of Battery Durability UNRs		region unique		not DONE yet	
		Vehicles make business in EU/UK	Vehicles make business in JPN	Vehicles make business in EU/UK and JPN	
					
ISC		<b>R83</b>	<b>JPN Regional</b>	<b>R83</b>	<b>JPN Regional</b>
	Part A (conducted by Manufactures)				
	same Part A family	procure vehicles from EU/UK market	under the consideration to accept EU/UK test results	procure vehicles from EU/UK market	under the consideration to accept EU/UK test results
	different Part A family	procure vehicles from EU/UK market	procure vehicles from JPN market	procure vehicles from EU/UK market	procure vehicles from JPN market

Basically, Japan accepts EU/EC test results based on GTR22, but Japan understands that the requirement of Part A in UNR83 is same as that in GTR22. (if the family is same, regardless of the region, the algorithm is also same.)

Japanese authority is considering to accept Part A results that are derived from **not only GTR22 but also UNR83.**

Have CPs / authorities agreed to the exchange of Part A verification results from other CPs?

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