

中国 WTO/TBT 国家通报咨询中心

China WTO/TBT National Notification & Enquiry Center

No.20,Hepingli East Street, Dongcheng District, Beijing,China,Tel: 86-10-57954638 Fax:86-10-57954689

FAX

TO: USA WTO TBT Enquiry Point	Email: usatbtep@nist.gov
Date: Jun 14, 2024	Number of pages: 2+1
Copies: Department for WTO Affairs, Ministry of Commerce of P.R. China	E-mail: dingtao@mofcom.gov.cn
Permanent Mission of P. R. of China to WTO	Fax: +41-22-9097688 E-mail: bizhonglin@126.com
From: China WTO/TBT National Notification & Enquiry Center.	Tel: 86-10-57954638 Fax: 86-10-57954689 E-mail: tbt@customs.gov.cn
Subject: Comments from P. R. China on United States Notification G/TBT/N/USA/2113 Federal Motor Vehicle Safety Standards; FMVSS No. 305a Electric-Powered Vehicles: Electric Powertrain Integrity Global Technical Regulation No. 20, Incorporation by Reference	

Comments from P. R. China on United States Notification

G/TBT/N/USA/2113

Federal Motor Vehicle Safety Standards; FMVSS No. 305a Electric-Powered Vehicles: Electric Powertrain Integrity Global Technical Regulation No. 20, Incorporation by Reference

Dear Sir or Madam,

We appreciate the opportunity to submit comments on the notified draft proposed by United States of America.

Enclosed please find comments in English and Chinese.

Please acknowledge receipt of the comments by e-mail to tbt@customs.gov.cn and pengdy_tbt@163.com.

Thank you very much in advance for United States of America taking into account comments from P.R. China. Your formal reply will be appreciated.

Best regards,

Jiao Yang



Deputy Director General

China WTO/TBT National Notification & Enquiry Center
No.20, Hepingli East Street, Dongcheng District, Beijing

Post Code: 100013

Tel: 86-10-57954638

Fax: 86-10-57954689

E-mail: tbt@customs.gov.cn pengdy_tbt@163.com

Comments from P. R. China on United States Notification

G/TBT/N/USA/2113

In the notified document Chapter III Proposals Based on GTR No. 20, the c.2 “Mitigating Risk of Thermal Propagation Due to Internal Short Within a Single Cell in the REESS” and c.3 “Warning Requirements for REESS Operations” both summarized the relevant chapters in UN GTR20 with NHTSA Proposal. But the proposal is not harmonized with UN GTR 20 with substantive differences.

We suggested to harmonize with UN GTR 20 in the c.2 “Mitigating Risk of Thermal Propagation Due to Internal Short Within a Single Cell in the REESS” and c.3 “Warning Requirements for REESS Operations” .

Comments in Chinese are as below:

通报文本第 III 章基于 GTR20 的提案，c.2 缓解 REESS 中单个电池内部短路导致的热传播风险和 c.3 REESS 操作的警告要求均总结了电动汽车安全全球技术法规（UN GTR 20）相关章节内容，并提出了 NHTSA 方面的提案。NHTSA 提案与电动汽车安全全球技术法规相关章节内容有实质性差异。

建议文本 c.2 缓解 REESS 中单个电池内部短路导致的热传播风险和 c.3 REESS 操作的警告要求与联合国电动汽车安全全球技术法规（UN GTR 20）保持协调一致。