

Proposal for Legal Inspection Requirements for Secondary Lithium Battery Packs for Road Vehicle Propulsion

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs

Introduction:

To achieve net-zero carbon emissions by 2050, the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu has been actively promoting the development of electric vehicles (EV). Since lithium battery thermal runaway is extremely difficult to extinguish and poses significant safety risks to both the public and the environment, the BSMI proposes including “Secondary Lithium Battery Packs for Road Vehicle Propulsion” with a capacity of up to 100 kWh in the mandatory inspection scope to strengthen product quality and safety. Applicants may choose between two alternative conformity assessment procedures: Registration of Product Certification (RPC) or Type-Approved Batch Inspection (TABI).

Proposed date of implementation: 1 July 2027.

Scope of covered products:

Description of Goods	Inspection Standards (Note)	C.C.C. Code (the first 6 digits are the same as HS Code)(For reference)	Conformity Assessment Procedures
Secondary Lithium Battery Packs for Road Vehicle Propulsion (inspection scope: battery capacity not exceeding 100 kWh for vehicles with 4 or more wheels)	CNS 16160:2023	8507.60.00.90.0G 8507.80.90.19.5G	RPC Scheme (Modules II+IV or II+V or II+VII) or TABI Scheme

Description of the two kinds of conformity assessment procedures

1. Registration of Product Certification (RPC) Scheme:

For product subject to Modules II+IV, II+V, or II+VII procedures, not only the products shall be type-tested in advance (Module II) by the BSMI or BSMI-recognized testing laboratories, but the quality management systems of the production premises must be in conformity with Module IV (Full Quality Management System), Module V (Production Quality Management System) or Module VII (Factory Inspection).

For Module IV and Module V, a registration certificate in accordance with the CNS 12681 (ISO 9001) is required to be obtained from the BSMI, or certification bodies recognized by the BSMI. As for Module VII, a factory inspection report issued by the BSMI or BSMI-recognized factory inspection bodies is needed in the same way.

In addition, a declaration of conformity-to-type is also required to ensure that the mass-produced commodities are in conformity with that shown in the type-test report for all the above three IV, V, VII modules.

After being certified and registered by the BSMI, products will be allowed to use the Commodity Inspection Mark with the letter ‘R’ and the identification number given by the BSMI. Additionally, these products can clear customs directly without any further inspection if not being sampled by RPC border check procedures. The application fee and annual fee for RPC are both NT\$5,000 (about US\$170) for each certification, and the RPC certification is valid for 3 years. If there are any serial products, an extra NT\$3,000 (about US\$102) of application fee will be charged for every application in each certification. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

2. Type-Approved Batch Inspection (TABI) Scheme

Under this procedure, manufacturers or importers shall have their products type-tested by the BSMI or BSMI-designated testing laboratories, and file an application for Type Approval to the BSMI or its branches.

After manufacturers or importers obtain a Type Approval certificate, they are required to file an application for batch inspection to the BSMI each time before their products are released from the production premises or arrive at the port of entry. The BSMI will then review the application and the related documents while additional samples may be required for further testing if it is deemed necessary.

After the products have passed the inspection, they will be allowed to use the Commodity Inspection Mark with the letter 'T' and the identification number given by the BSMI. The application fee for the Type Approval is NT\$3,500, and a Type Approval certificate is valid for three years. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

*Further information on the two schemes can also be found on the BSMI website:

<https://www.bsmi.gov.tw/wSite/lp?ctNode=9768&CtUnit=4132&BaseDSD=7&mp=2>

Locations to apply for Type Testing:

The BSMI designated testing laboratories.

Locations to apply for Registration of Product Certification:

The BSMI or its branches.

Locations to apply for Batch Inspection:

1. Domestic manufacturers or consigned manufacturers: submit inspection applications to the BSMI or its branches according to the location of the production premises. If necessary, cross-jurisdictional inspections may be requested.
2. Importers or entrusted importers: apply to the BSMI or its branches for inspection according to the jurisdiction of the port of entry. If necessary, cross-jurisdictional inspections may be requested.

Time required for Registration of Product Certification:

14 working days. (This period does not include the time for corrective actions by the applicant due to deficiencies in the documents or samples. Extra 7 working days may be required if additional tests are required.)

Related requirements:

1. The inspection for the above listed commodity, no matter imported and domestically produced, the inspection will begin from 1 July 2027. The import regulation code is C02. From the announcement date, the BSMI can accept applications for Type Approval Batch Inspection and Registration of Product Certification for the above listed commodity.
2. Those who apply for a certificate to the BSMI from the date of announcement shall provide the type test report that meets the inspection standards. The certificate shall be issued after the examination by the BSMI. The validity period of the certificate shall be three years from the date of issuance. (If the issuance date is before 30 June 2027, the effective date will begin from 1 July 2027 and the expiry date will be 30 June 2030)
3. Products that have obtained vehicle safety inspection criteria review reports issued by institutions commissioned by the Ministry of Transportation and Communications are not subject to mandatory inspection by the BSMI.
4. For the above listed commodity that complies with CNS 16160 and is certified under the Voluntary Product Certification (VPC), the type-test report may be issued by the original BSMI-designated testing laboratories after the supplementary testing is conducted to address differences in the product or standard.
5. The technical documents required for type testing shall comply with the requirements specified in the "Directions Governing Type Approval of Electrical and Electronic Commodities."
6. Fees for product type-testing: Charged in accordance with the fee regulations of the BSMI's designated testing laboratory.
7. Fees for product registration of product certification and type approval batch-by-batch inspection: Charged

in accordance with the relevant provisions of the "Regulations Governing Fees for Commodity Inspection."

8. The inspection standards of the products listed in the table shall be the version published in this announcement. If any updated version is available, the BSMI shall publish the implementation date of the updated version in a further announcement.
9. The C.C.C. Codes listed in the table are used for reference only. The commodity shall still comply with the requirements before entering into the market, even though its C.C.C. Code is identified differently by the Customs Administration, Ministry of Finance or International Trade Administration, Ministry of Economic Affairs.
10. Commodities with combined features or multifunctional products shall comply with the respective inspection standards and conformity assessment procedures of RPC scheme.