



August 12, 2021

Chronology of Defect / Noncompliance Determination

573.6 (c) (6) (7)

Describe the chronology of events leading up to the defect decision or test data for the noncompliance decision:

On December 10, 2020, GM filed recall 20V764 involving toe link fracture in high corrosion states. Recall 20V764 involved certain 2010 – 2013 Buick LaCrosse, 2012 – 2013 Buick Regal, and 2013 Chevrolet Malibu vehicles. Although the supplier's (Shanghai Huizhong Automotive Manufacturing) manufacturing records provided a breakpoint for the prior recall that eliminated a portion of the 2013 model year, GM continued to investigate whether vehicles outside this population might be susceptible to this same condition. Toward this end, GM initiated an employee vehicle survey and inspection process and found suspect parts outside of this original population. GM opened an investigation on February 12, 2021.

On February 25, 2021, GM's employee vehicle survey and inspection process was expanded. Final results of the inspections found four 2013 vehicles with toe links supplied by Shanghai Huizhong Automotive Manufacturing that were not part of the 20V764 recall but exhibited corrosion patterns similar to the recalled toe links. GM's investigator completed an initial review of warranty and post-warranty data on March 2, 2021. In mid-May 2021, additional post-warranty data was reviewed. A final review of field data was completed on July 17, 2021 and showed eight potentially relevant vehicles with post-warranty claims of toe link fracture on 2013 vehicles not recalled under 20V764. All eight vehicles were either registered in high corrosion regions in the US or Canada or had previously spent time in high corrosion regions.

Material loss projection analysis was completed on obtained samples and reviewed on August 4, 2021, predicting corrosion rates similar to toe links recalled under 20V764 given projected field exposure. On August 5, 2021, GM's Safety and Field Action Decision Authority decided to conduct a safety recall for 2013 model year vehicles not already recalled under 20V764 that were ever registered in Corrosion States and that were built with toe links supplied by Shanghai Huizhong Automotive Manufacturing.