#### OMB Control No.: 2127-0004

# Part 573 Safety Recall Report

# 20V-003

Manufacturer Name: Subaru of America, Inc.

**Submission Date:** JAN 07, 2020 NHTSA Recall No.: 20V-003 Manufacturer Recall No.: TKC-20



#### **Manufacturer Information:**

Manufacturer Name: Subaru of America, Inc.

Address: One Subaru Drive

Camden NJ 08103

Company phone: 844-373-6614

# **Population:**

Number of potentially involved: 111,562 Estimated percentage with defect: 100 %

#### Vehicle Information:

Vehicle 1: 2009-2013 Subaru Forester

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: -Description of the issue: In accordance with the terms specified in the May 4, 2016 Amendment to the November 3, 2015 Consent Order in EA15-001. Subaru is submitting this DIR (Zone C) in accordance with section 46 of Coordinated Remedy

Order.

-The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.

-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2009 to 2013 model year Forester vehicles. The number of affected Forester vehicles is

3.268.

Production Dates: DEC 07, 2007 - NOV 20, 2012

NR End: NR ☐ Not sequential VIN Range 1: Begin:

Vehicle 2: 2003-2006 Subaru Baja

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive 1	Information
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-The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.

-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2003 to 2006 model year Baja vehicles. The number of affected Baja vehicles is 2,116.

Production Dates: AUG 06, 2002 - APR 12, 2006

End: NR VIN Range 1: Begin: **☐** Not sequential

Vehicle 3: 2004-2011 Subaru Impreza

Vehicle Type: LIGHT VEHICLES **Body Style: STATIONWAGON** 

Power Train: GAS

Descriptive Information: -Description of the issue: In accordance with the terms specified in the May 4, 2016 Amendment to the November 3, 2015 Consent Order in EA15-001. Subaru is submitting this DIR (Zone C) in accordance with section 46 of Coordinated Remedy Order.

> -The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.

> -How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2004 to 2011 model year Impreza Stationwagon vehicles. The number of affected Impreza Stationwagon vehicles is 11,125.

Production Dates: JAN 09, 2003 - JUN 20, 2011

End: NR Not sequential VIN Range 1: Begin:

Vehicle 4: 2004-2011 Subaru Impreza

Vehicle Type: LIGHT VEHICLES

Body Style : 4-DOOR Power Train : GAS

Descriptive Information: -Description of the issue: In accordance with the terms specified in the May 4, 2016

Amendment to the November 3, 2015 Consent Order in EA15-001. Subaru is

submitting this DIR (Zone C) in accordance with section 46 of Coordinated Remedy

Order.

-The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.

-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2004 to 2011 model year Impreza 4-Door vehicles. The number of affected Impreza 4-Door vehicles is 5.660.

vehicles is 5,660.

Production Dates: JAN 09, 2003 - MAY 31, 2011

VIN Range 1 : Begin : NR End : NR

Not sequential

Vehicle 5: 2004-2014 Subaru WRX

Vehicle Type: LIGHT VEHICLES Body Style: STATIONWAGON

Power Train: GAS

Descriptive Information: -Description of the issue: In accordance with the terms specified in the May 4, 2016

Amendment to the November 3, 2015 Consent Order in EA15-001. Subaru is

submitting this DIR (Zone C) in accordance with section 46 of Coordinated Remedy

Order.

-The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.

-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2004

	to 2014 model year WRX Stationwagon vehicles. The number of affected WRX Stationwagon vehicles is 2,234.						
Production Dates:	JAN 09, 2003 - JA	N 21, 2014					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle Type :	2004-2014 Subar LIGHT VEHICLES						
Body Style :							
Power Train			_				
Descriptive Information :	: -Description of the issue: In accordance with the terms specified in the May 4, 2016 Amendment to the November 3, 2015 Consent Order in EA15-001. Subaru is submitting this DIR (Zone C) in accordance with section 46 of Coordinated Remedy Order.						
	-The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.						
	-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2004 to 2014 model year WRX 4-Door vehicles. The number of affected WRX 4-Door vehicles is 3,619.						
	JAN 09, 2003 - NO		End:	ND	□ Not cognential		
VIN Range 1:	веди:	NR	Ena :	NK	☐ Not sequential		
Descriptive Information	n: -Description of the issue: In accordance with the terms specified in the May 4, 2016 Amendment to the November 3, 2015 Consent Order in EA15-001. Subaru is submitting this DIR (Zone C) in accordance with section 46 of Coordinated Remedy Order.						
	-The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah,						

	Vermont, Washington, Wisconsin, and Wyoming.						
	-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2003 to 2014 model year Legacy vehicles. The number of affected Legacy vehicles is 17,862.						
Production Dates :							
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle Type : Body Style : Power Train :	GAS	ΞS		with the to	erms specified in the May 4, 2016		
Descriptive information :	Amendment to	the Novemb	er 3, 2015 (	Consent Ord	der in EA15-001. Subaru is ection 46 of Coordinated Remedy		
	-The basis for how the recall population was determined: This recall affects vehicles which may have had an interim "like-for-like" repair performed under a previous air bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.						
	-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2003 to 2014 model year Outback vehicles. The number of affected Outback vehicles is 64,459.						
Production Dates:	MAR 08, 2002 -	MAY 21, 20	14				
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle Type : Body Style : Power Train :	-Description of Amendment to	ES ON the issue: In the Novemb	er 3, 2015 (	Consent Ord	erms specified in the May 4, 2016 der in EA15-001. Subaru is ection 46 of Coordinated Remedy		
					rmined: This recall affects vehicles air performed under a previous air		

bag recall using Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate for Zone C. Zone C includes states with lower temperature cycling and absolute humidity. It includes: Alaska, Colorado, Connecticut, Idaho, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New York, North Dakota, Oregon, Rhode Island, South Dakota, Utah, Vermont, Washington, Wisconsin, and Wyoming.

-How the recalled products differ from products that were not included in the recall: Vehicles that did not have an interim "like-for-like" repair performed under a previous air bag recall are not included. The recall population includes certain 2005 to 2006 model year Saab 9-2X vehicles. The number of affected Saab 9-2X vehicles is 1.219.

Production Dates: FEB 12, 2004 - MAR 17, 2006

VIN Range 1 : Begin : NR End : NR Not sequential

#### **Description of Defect:**

Description of the Defect: In accordance with the terms specified in the May 4, 2016 Amendment to the

November 3, 2015 Consent Order in EA15-001. Subaru is submitting this DIR (Zone C) in accordance with section 46 of Coordinated Remedy Order.

Subaru intends to implement the "other" reporting category for removed vehicles in Quarterly Reporting as permitted in the Third Amendment to the Coordinated Remedy Order ("ACRO"), Paragraphs 45 through 49. As a condition of the ACRO, all affected vehicles will remain active, or "live," across Subaru's data systems such that any search of "other" removed VINs will return an open recall status. For this reason, the number of potentially involved vehicles in this report will remain the same. Future changes to overall Total Removed counts, including "other," will be reflected in quarterly reporting.

FMVSS 1: NR FMVSS 2: NR

Description of the Safety Risk: Activation of a non-desiccated ammonium nitrate inflator with degraded

propellant may result in an inflator rupture. An inflator rupture may cause metal fragments to pass through the air bag and into the vehicle interior at

high speed, which may result in injury or death to vehicle occupants.

Description of the Cause: Based upon Takata's investigation to date, the propellant wafers in some of the

subject inflators may degrade over time, which could lead to overaggressive combustion in the event the air bag is activated. Overly aggressive combustion creates excessive internal pressure when the inflator is activated, which may

cause the inflator body to rupture.

Identification of Any Warning None.

that can Occur:

# **Supplier Identification:**

# **Component Manufacturer**

Name: TK Global LLC. Address: 111 Peyerk Court

**Bruce Township MICHIGAN 48065** 

**Country: United States** 

#### **Chronology:**

November 3, 2015 - NHTSA and Takata entered into a Consent Order in EA15-001 to resolve issues raised in that investigation, to mitigate and control risks of harm, and to promote public safety.

May 4, 2016 - NHTSA and Takata entered into an Amendment to the November 3, 2015 Consent Order. As stated in that Amendment, on the basis of testing and analysis conducted by Takata and by independent research organizations, NHTSA has concluded that, "at some point in the future all non-desiccated frontal Takata PSAN inflators will reach a threshold level of degradation that could result in the inflator becoming unreasonably dangerous." As a result of this conclusion, and pursuant to Paragraph 29 of the November 3, 2015 Consent Order, NHTSA ordered Takata to file certain defect information reports ("DIR"), in accordance with the schedule set forth in Paragraph 14 of the Amendment.

May 16, 2016 - As specified in that schedule, Takata submitted the DIR.

May 20, 2016 - Subaru has determined to launch recall according to Section 46 of Coordinated Remedy Order.

January 3, 2017 - As specified in that schedule, Takata submitted the DIR.

January 10, 2017 - Subaru has determined to launch recall according to Section 32 of 3rd amended Coordinated Remedy Order.

January 2, 2018 - As specified in that schedule, Takata submitted the DIR.

January 9, 2018 - Subaru has determined to launch recall according to Section 32 of 3rd amended Coordinated Remedy Order.

January 2, 2019 - As specified in that schedule, TK Global submitted the DIR.

January 8, 2019 - Subaru has determined to launch recall according to Section 32 of 3rd amended Coordinated Remedy Order.

January 2, 2020 - Subaru has determined to launch recall according to Section 32 of 3rd amended Coordinated Remedy Order.

## **Description of Remedy:**

Description of Remedy Program: The remedy plan calls for dealers to replace the passenger airbag inflator.

from Recalled Component:

How Remedy Component Differs The remedy components do not contain PSAN.

The recalled component is "AIR B MOD ASSY P" (part number: 98279SC010 for Forester, 98279AE00A for 2003-2004MY Legacy/ Outback and 2003-2006MY Baja, 98279AG00A for 2005-2009MY Legacy/ Outback, 98279AJ02A for 2010-2014MY Legacy/Outback, 98279FE000 for 2004-2005MY Impreza/WRX, 98279FE160 for 2006-2007MY Impreza/

WRX, 98279FG010 for 2008-2011MY Impreza and 2008-2014MY WRX).

Identify How/When Recall Condition As for Impreza from 2012MY, Forester from 2014MY, and WRX, Legacy/ was Corrected in Production: Outback from 2015MY, parts which are different from Takata Non-Desiccated Frontal Passenger-side Air Bag Inflators containing Phase Stabilized Ammonium Nitrate are being installed in their production. Baja and Saab 9-2X ended production, with 2006MY as the last.

#### **Recall Schedule:**

Description of Recall Schedule: Subaru will send owner notification letters advising the customer to

schedule a repair within 60 days.

Planned Dealer Notification Date: JAN 07, 2020 - JAN 07, 2020 Planned Owner Notification Date: JAN 07, 2020 - FEB 27, 2020

\* NR - Not Reported