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agenda item 2.8.)

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 94

(Frontal collision protection)

Transmitted by the Expert from Consumers International (CI)

Note: The proposal reproduced below was prepared by the expert from Consumers International in order to improve the warnings about hazards from airbags. Proposed modifications to the existing text are shown in **bold**.

Note: This document is distributed to the Experts on Passive Safety only.

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A. PROPOSAL

Paragraph 4.1., amend to read:

"4.1. If the vehicle type submitted for approval pursuant to this Regulation meets the requirements of paragraphs 5 and 6 below, approval of that vehicle type shall be granted."

Insert new paragraph 4.1.3., to read:

"4.1.3. During approval, the manufacturer shall demonstrate that suitable provision has been made to provide warnings to meet the requirements of paragraphs 6.2.1 to 6.2.3 for all countries in which the vehicle will be sold. It shall also be demonstrated, to the satisfaction of the Type Approval authority, that procedures exist to ensure that the correct warnings will be fitted in each country in which the new vehicle is sold."

Paragraph 6.2.1., amend to read:

"6.2.1. As a minimum, this information shall consist of a pictogram and text warning as indicated below. The text shall be in at least one language of the country in which the vehicle is sold. The information must be durably affixed to the vehicle in a way that will ensure that the warning remains present and legible for the life of the vehicle and cannot easily be removed without the use of tools."



*/ Alter according to which seat the warning applies.

The overall dimensions shall be 130 mm x 60 mm, as a minimum."

Paragraphs 6.2.2. and 6.2.3., amend to read:

"6.2.2. In the case of a frontal protection airbag on the front seat, the warning shall be durably affixed to each face of both front sun visors in such a position that at least one warning on each sun visor is visible at all times, irrespective of the position of the sun visors. The text size must allow the label to be easily read by a normal sighted user seated on the seat concerned.

In the case of a frontal protection airbag for other seats in the vehicle, the warning must be directly ahead of the relevant seat, and clearly visible at all times to someone installing a rear-facing child restraint on that seat. The text size must allow the label to be easily read by a normal sighted user seated on the seat concerned.

This requirement does not apply to those seats equipped with a device which automatically deactivates the **frontal protection** airbag assembly when **any** rearward facing child restraint is installed.

- 6.2.3. Detailed information, making reference to the **warning**, shall be contained in the owner's manual of the vehicle; as a minimum the following text in an official ECE language, supplemented by corresponding text in the language of the country where the vehicle is to be registered, must include:

"Do not use a rearward facing child restraint on a seat protected by an airbag in front of it"

The text shall be accompanied by **an illustration of the warning to be found in the vehicle.**"

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B. JUSTIFICATION

In a presentation made at the twenty-second GRSP session in December 1997 (document TRANS/WP.29/GRSP/1997/10), Consumers International proposed harmonization with legislation in the United States of America to require clear labelling on vehicles and child restraints to warn users of the risks posed by frontal protection airbags on passenger seating positions. At the one-hundred-and-sixteenth session of WP.29, GRSP's proposal to amend Regulation No. 44 for the clear labelling of rearward facing child restraints was adopted unanimously (Supplement 2 to the 03 series of amendments to Regulation No. 44).

This now leaves the issue of clear labelling of vehicles to be resolved. The warning label applied to child restraints is a combined pictogram and text label. It is proposed that for vehicle labelling GRSP should adopt a similar approach to that required for child restraints. This provides the consumer with clear consistent advice permanently attached to both the source of the hazard, the vehicle, and the product for which the fatal risk exists, the rearward facing child restraint.

At the twenty-eighth session of GRSP (27 November-1 December 2000), Sweden, Netherlands, United Kingdom, United States of America, Japan, Hungary, Norway, Finland, Czechoslovakia and Germany were in favour of following such an approach.

It is proposed that the fundamentals of the approach should be as follows:

1. The vehicle warning should use the same concept of pictogram plus text as has been adopted for child restraints.
2. The pictogram section of the warning should be identical for both child restraints and vehicles.
3. The text on the warning should be required to be in at least one language of the country in which the vehicle is sold. This is the same requirement as that placed on the child restraint manufacturers.
4. The location and size of the warning should be standardized, so that users become familiar with exactly where they might expect to find such information. Current practice of vehicle labelling for this hazard leaves the consumer to search the vehicle for the warning, which is not satisfactory.
5. The warning should be of an eye-catching design, and visible at all times.
6. The warning must be a permanent feature within the vehicle, as the hazard will exist for the life of the vehicle.
7. The warning requirements should be introduced fast, as passenger airbags have spread very rapidly into the market.
8. Pictogram and text warnings should be seen as a short-term measure, which will no longer be necessary when sophisticated airbags replace the current versions. As soon as the design of the airbag removes the hazard for any rear facing child restraint, warnings to the user will no longer be required.
9. This argues for the rapid adoption and implementation of a uniform warning throughout the new vehicle fleet.

The new warning proposed replaces the current figure in paragraph 6.2.1. of Regulation No. 94 showing the ACEA pictogram. It is based on the Figure from paragraph 4.5. of Supplement 2 to the 03 series of amendments to Regulation No. 44. This paragraph describes the label required to be placed in the immediate area where the child's head rests within a rearward facing child restraint.

The new paragraph 4.1.3. proposed to be introduced into the Approval section of the Regulation explains the basis on which the Type Approval Authority can confirm compliance with paragraph 6.
