

Consumer groups' comments to ECE/TRANS/WP.29/GRSP/2010/12

Consumer groups¹ are very concerned that the modified airbag warning label as proposed by the International Organization of Motor Vehicle Manufacturers, OICA, (ECE/TRANS/WP.29/GRSP/2010/12) will not deliver an acceptable level of safety.

This airbag warning label should be clearly understood by the public. In order to be effective it should:

- Warn on the spot where the child restraint system (CRS) is fitted and be clear to the person who is about to install the CRS
- Make clear what the danger is ('DEATH OR SERIOUS INJURY can occur')
- Describe what should be done to avoid danger ('DO NOT place a rear-facing child seat on this seat with airbag).

The label described in Regulation No. 94 meets these requirements. It was established after lengthy discussions in GRSP in which consumer groups have put forward that the pictogram only was not understood by the public and that reference to the manual was a rather permissive solution. GRSP decided on the option that was supposed to deliver the best guarantee that rearward facing child restraints should not be used in front of an activated passenger airbag.

The by OICA proposed modified label, without text, hardly differs from earlier rejected options. It does not meet the three requirements described above.

The rationale for this by OICA proposed change is not because of new views how consumers should be informed more effectively on this life threatening danger, however just '...to simplify the situation', meaning facilitating manufacturers. There are no studies that support this proposal explaining how well the new label is understood by the public, or studies on effects on wrong installation rates.

Although we sympathise with the idea that car manufacturers should be facilitated if possible, we strongly object to this proposal; facilitating manufacturers should not be detrimental to consumer safety.

Moreover we are very unhappy with this precedent where a UN-ECE regulation is watered down because of less stringent legislation within the EU. This is against the ambition to maintain at least the best practice safety level.

In summary we urge delegates not to agree replacing the current airbag warning label by any 'pictogram only' variant that is not demonstrably well understood by the public or not meeting the three basic requirements mentioned above.

Consumer groups strongly object to this proposal, but are happy to discuss any other option that does meet our requirements. In this respect it might in future be worth to explore new technologies e.g. using the board computer and a display that will prevent the need to rely on print / sticker technology and can be adapted easily to different languages.

¹ Consumers International/ANEC, FIA and FIA Foundation