



Informal document N° 19
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agenda item 2.8)

AIRBAG WARNING - ECE REGULATION 94

OICA contribution

I. INTRODUCTION

After years of discussion on this subject, GRSP appears to be now approaching final conclusions on this subject.

During the 28th GRSP session, OICA submitted informal document 16 containing a possible solution to overcome diverging opinions.

GRSP however requested OICA to further review its proposal, which is now submitted after further intensive discussions within OICA.

OICA wishes to stress that the following proposal is the best offer OICA can make, in view of the difficulties to accommodate the long-standing requests from the expert of Consumers International within the framework of an international type approval, conformity of production and mutual recognition scheme as per the 1958 Agreement.

Any deviation from the following concept would in OICA's opinion require renewed and detailed evaluation of all legal implications; OICA believes that the times are now ripe for governmental authorities to reach a final decision on the issue of "airbag warning".

II. TEXT LABELLING IN THE FRAMEWORK OF THE 1958 AGREEMENT

As already repeatedly expressed in past GRSP sessions, OICA is not at all against airbag warning; as a matter of fact, many vehicles today contain more information than the current "pictogram only" requirement. Unfortunately, this has given the wrong impression that text warning would equally not create any problem in an international type approval framework, with the subsequent issues of conformity of production and mutual recognition.

However, the following basics should be well understood:

1. At time of type approval, no single vehicle of that type has been sold/registered yet. There is consequently no possibility for the manufacturer to meet a type approval requirement such that vehicles must be labelled in the language of the country where they are sold.

2. At time of production, there is virtually no way for the manufacturer:
 - a. to know in advance precisely where particular vehicles will actually be sold
 - b. to keep in stock a huge amount of text labels in the huge amount of existing languages
 - c. to ensure that the correct vehicle will be labelled correctly.
3. In case of type approval of a vehicle with a text label in a particular language, current conformity of production requirements would generally require all production to be systematically labelled identically; this would obviously contradict the idea of labelling vehicles in the language(s) of the country where they are sold.

III. OUTLINE OF THE OICA PROPOSAL

In order to overcome these difficulties, OICA has prepared the following proposal which should hopefully constitute an appropriate solution. In essence, the following proposal consists of:

1. An official list containing the translations of the required text for the label in all the languages of the Contracting Parties. Such list could become a new, separate, annex to ECE R94.
2. The manufacturer requests ECE type approval on the basis of a label in the language of the country where ECE approval is requested. The type approval authority can hence verify that the text corresponds to the requirements, as per the new annex containing all translations. Other authorities would similarly not be in a position to contest validity of the approval.
3. A general requirement such that authorities ensure that vehicles sold on their territory are correctly labelled. This in fact ensures that the real implementation of the requirements occurs at national level, which is the only way to circumvent the problems described above.
4. Further detailed requirements on layout and location of label.

IV. PROBLEM OF MANUAL DEACTIVATION OF AIRBAGS

OICA was also requested by GRSP to develop a proposal for the identification of the manual airbag deactivation device.

During GRSP-28, OICA had included a preliminary proposal in its informal document 16, based on an ISO symbol. It however appears that this symbol might not constitute the optimum solution.

In any case, for cars fitted with such a deactivation device, a new warning label should be developed, potentially replacing in this case the "standard" label foreseen in cars not equipped with such device.

V. DETAILED OICA PROPOSAL TO AMEND THE CURRENT ECE REGULATION 94 LABELLING REQUIREMENTS

Paragraphs 6.1.2 to 6.2.3, replace by:

- "6.1.2 For a vehicle fitted with a passenger airbag intended to protect occupants other than the driver, this information shall consist of the warning label described in paragraph 6.2 below.
- 6.2 A vehicle fitted with one or more airbags which cannot be deactivated manually shall carry information about the extreme hazard associated with the use of rearward-facing child restraints on seats equipped with airbag assemblies.
- 6.2.1 As a minimum, this information shall consist of a label containing a pictogram and text warning as indicated below.



The label shown above may be adapted such that the size, layout, colours and/or pictogram differ from the example above; however, the text content shall meet the above prescriptions.

- 6.2.2 At time of type approval, the label shall be in at least one of the languages of the Contracting Party where the application for approval is submitted.
- 6.2.3 Contracting Parties applying this Regulation shall ensure that vehicles offered for sale on their territory are labelled according to paragraph 6.2.1 in at least one of the national languages of that country. Annex ... to this Regulation contains a list of the approved text in the various languages.
- 6.2.4 The text size must allow the label to be easily read by a normal sighted user seated on the seat concerned.
- 6.2.5 The label shall be durably affixed and located such that it is easily visible to a person about to install a rearward-facing child restraint on the seat in question. A permanent reference should be visible at all times, in case the warning is not visible when the door is closed.

In the case of a frontal protection airbag for seats other than the front passenger seat in the vehicle, the warning must be directly ahead of the relevant seat, and clearly visible to someone installing a rear-facing child restraint on that seat.

- 6.2.6 These requirements do 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.
- 6.2.7 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 language of the country where the vehicle is to be sold, 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."
