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**CANADIAN COMMENTS ON THE PROPOSAL FOR A NEW GLOBAL
TECHNICAL REGULATION CONCERNING SAFETY GLAZING MATERIALS
FOR MOTOR VEHICLES AND MOTOR VEHICLE EQUIPMENT**

Transmitted by the Expert from Canada

Following are the Canadian preliminary comments regarding the proposal for a new gtr concerning safety-glazing materials for motor vehicles:

1. Windscreens in Canada must be made of laminated glass to comply with the Canadian Motor Vehicle Safety Regulation (MVSR) 205, Glazing Material. Other types of windscreens would increase risk to the safety of occupants. Some of the safety hazards associated with tempered (toughened or treated) glass used in windscreens are as follows:
 - a. If broken by stones or other objects, the entire windscreens becomes close to opaque as it will break into small pieces;
 - b. Wind pressure may cause the windscreens to collapse into the car; and,
 - c. If the windscreens is broken there will not be any means of preventing ejection of the occupant(s).
2. Some of the safety hazards associated with glass-plastic windscreens are unsatisfactory durability and damage due to scratching and abrasion
3. Following the approach specified “**One test having given an unsatisfactory results, a further series of test carried out on a new set of test pieces gives a satisfactory results**” as described throughout the gtr document, could result in a test being performed on different samples until a specific group of samples passes, even though the remainder failed. This proposal would create serious difficulties for Canadian compliance, as the “Self Certification” premise requires that all glazing or a percentage of the sample group comply.
Canadian requirements follow a pass/fail criterion
4. Many terms in the proposed gtr document are subject to interpretation since they do not refer to specific values. For example: "about 3mm thick", "substantially perpendicular" and "appropriate accuracy" are not quantifiable terms. Canadian law

requires that testing and inspection results be defined as either an "acceptable" result or a "non acceptable" result and that the testing be repeatable.

As noted, the Canadian Motor Vehicle Safety Act, institutes a Self Certification program for compliance which puts the onus on the manufacturer to ensure that all certified products comply to the requirements. Canada independently monitors the self-certification programs of the numerous manufacturers of vehicles being built for the Canadian market. This is accomplished through a combination of selective inspection and testing of motor vehicles, purchased at the retail level, and a targeted to review the manufacturers certification test records. This allows the Department to confirm whether or not the motor vehicle manufacturers and importers are meeting their responsibilities and that their vehicles do meet the requisite minimum safety performance under the Canadian regulation requirements, as prescribed in the applicable Canada Motor Vehicle Safety Standards. Definable tests and repeatable testing requirements are the corner stone of the compliance-monitoring program to review a manufacturer's certification test data that provide the assurance of vehicle compliance.

5. Canada also has concerns with the issue of gage repeatability and reproducibility that could be difficult to obtain since some fixture drawings and procedures are not detailed enough and could be subject to interpretation.
6. Also, there is concern that reference to one manufacturer as a supplier for test equipment may produce the appearance of favouritism of one company over others (i.e. instrument for abrasion test).

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