Proposal for Supplement 1 to the 02 series of amendments

Submitted by the expert of the European Commission*

The text reproduced below was prepared by the expert from the European Commission in order to fully harmonize the airbag warning label, without text that needs to be translated into any other national language, but which is universally understood. The proposal it is based on a document without a symbol (GRSP-47-04/Rev.1) distributed during the forty-seventh session of the Working Party on Passive Safety (GRSP) and on ECE/TRANS/WP.29/GRSP/2010/12. The modifications to the existing text of Regulation No. 94 are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2006–2010 (ECE/TRANS/166/Add.1, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.
I. Proposal

Paragraph 6.2.1., amend to read:

“6.2.1. As a minimum, this information shall consist of a label containing clear warning pictograms and text warning as indicated below.

The overall dimensions shall be at least 120 x 60 mm or the equivalent area, as a minimum.

The label shown above may be adapted in such a way that the layout differs from the example above; however, the text content shall meet the above prescriptions.”

Paragraph 6.2.2., shall be deleted.
Paragraph 6.2.3. renumber as 6.2.2 and amend to read:

“6.2.2. In the case of a frontal protection airbag on the front passenger seat, the warning shall be durably affixed to each face of the passenger front sun visor in such a position that at least one warning on the sun visor is visible at all times, irrespective of the position of the sun visor. Alternatively, one warning shall be located on the visible face of the stowed sun visor and a second warning shall be located on the roof behind the visor, so, at least one warning is visible all times. *It shall not be possible to easily remove the warning label from the visor and the roof without any obvious and clearly visible damage remaining to the visor or the roof in the interior of the vehicle.* 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 of paragraph 6.2.1. and 6.2.2. does not apply to those seats seating positions equipped with a device which automatically deactivates the frontal protection airbag assembly when any rearward facing child restraint is installed.”

Paragraph 6.2.4. renumber as 6.2.3. and amend to read:

“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 the all official languages of the country or countries where the vehicle could reasonably be expected to be registered (e.g. within the territory of the European Union, in Japan, in Russian Federation or in New Zealand, etc.), must shall at least include:

“*Do not NEVER use a rearward facing child restraint on a seat protected by an airbag ACTIVE AIRBAG in front of it, DEATH or SERIOUS INJURY to the CHILD can occur*”

The text shall be accompanied by an illustration of the warning label found in the vehicle. The information shall be easily found in the owner's manual (e.g. specific reference to the information printed on the first page, identifying page tab or separate booklet, etc.)

The requirements of paragraph 6.2.3. do not apply to vehicles of which all passenger seating positions are equipped with a device which automatically deactivates the frontal protection airbag assembly when any rearward facing child restraint is installed.”

II. Justification

1. It is deemed very beneficial to harmonize the warning label and reduce the burden for vehicle manufacturers, as it can be challenging for manufacturers to ensure that the appropriate language version of the label is provided for the country in which the vehicle is
eventually put into service. In contradiction, it can be assumed that importers and distributors can easily substitute and provide an appropriate language version of the vehicle’s instruction manual.

2. The original warning text on the label, which is omitted due to this proposal, should still be referenced to by means of referral through pictograms and images, in order to avoid any degradation of the safety function (i.e. providing the explicit warning concerning the placement of rearward facing Child Restrain Systems on seats fitted with active airbags).

3. It is expected that the comprehension of the proposed warning label, with the message conveyed by means of pictogram images rather than detailed text, is at least equivalent to that of current warning labels, incorporating the detailed text, as present in vehicles which are available on the market today.

4. To facilitate for further language challenges, for instance in case of import and export of vehicles, use of rental cars by foreigners, etc., it is relatively easy to provide for additional printed text in many (even exotic) languages in the vehicle’s instruction manual. The important information should at least be provided and printed in all appropriate national languages wherever the vehicle could reasonably be expected to be put into service. For instance, vehicles with a European whole vehicle type-approval (EU-WVTA), should as a minimum have the information printed in all 23 official languages of the European Union and it is further recommended to include additional languages of other countries where the EU-WVTA is accepted.

5. The size of the warning label should remain at least 120 x 60 mm, as the size proposed in working document ECE/TRANS/WP.29/GRSP/2010/12 is not sufficient, which was clarified in Informal document No. GRSP-47-04/Rev.1.

6. The images of the different kinds of child seats and booster seats (including non-rearward facing child seats) are included to make the vehicle operator unambiguously aware that this warning concerns child restraint systems in general and indicates clearly to refer to the instruction manual. It can be assumed that it would always be beneficial if the instruction manual is referenced by the vehicle operator when any kind of child seat is about to be installed in the vehicle.

7. Finally, it should be made clear that the warning labels are not to be removed easily without any permanent damage remaining to the sun visor or roof liner in the interior of the vehicle.