Proposal for supplement 4 to the 01 series of amendments to Regulation No. 94

The text reproduced below was prepared by the expert from the European Commission in order to fully harmonise the airbag warning label, without text that needs to be translated into any other national language, but which is universally understood. The proposal is based on working document ECE/TRANS/WP.29/GRSP/2010/12 and is meant to replace specific elements in the aforementioned working document. The modifications to the existing text of Regulation No. 94 are originally marked in bold or strikethrough characters and the modifications in comparison to the above mentioned working document are highlighted in grey.

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, an example of which is as indicated below.

Label outline, vertical and horizontal line black

White background

Top text and symbol black, with yellow or amber background

Bottom pictogram and images black with white background

Pictogram according to ISO 2575:2004 - Z.01 shall be exact or larger as well as in the specified colours

Pictogram and images shall be exact or larger
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 The requirements 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 be registered (e.g. the European Union, Japan, Russia or New Zealand, etc.), must shall at least include:

‘Do not NEVER use a rearward facing child restraint on a seat protected by an 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 to be 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

It is very beneficial to harmonise the warning label and reduce the burden for vehicle manufacturers, as it can be challenging for manufacturers to ensure that the appropriate language is displayed concerning the country in which the vehicle is eventually put into service.

The original warning text that could be omitted due to the proposal should still be referenced to by means of pictograms and images, in order to avoid any degradation of the safety function (i.e. regarding Child Restraint Systems) of the warning label. Additionally, this might also enhance the comprehension of the warning by persons not familiar with a certain national language. For further consideration the following is proposed. To facilitate for such language challenges in case of import and export of new vehicles, use of rental cars by foreigners, etc., the few pages dedicated to this important information can easily be printed in all appropriate language versions wherever the vehicle could be registered based on provisions for first national registration (first entry into service). This means that in case of a vehicle with an EU-WVTA (whole vehicle type-approval), the information would have to be provided in at least the 23 official languages of the European Union.

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.

![Warning Label](image)

(Actual proposed size of 80 x 40 mm if printed on A4 paper)

The images of the different kinds of child and booster seats are included to make the person unambiguously aware that this warning concerns Child Restraint Systems in general and indicates clearly to refer to the instruction manual. In the original proposal, it is not clear enough under what circumstances the instruction manual should be referenced by the vehicle operator.

The exact airbag warning pictogram as published under ISO 2575:2004 – Z.01 should be used, as this pictogram seems to be understood very clearly, particularly that it concerns children, placed in a rearward facing child seat, on a front seat with the presence of an airbag. Especially the latter is rather remarkable and may be contributed to the common assumption that an airbag is expected to be white (as it appears in the pictogram).

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.