

Distr.
GENERAL

TRANS/WP.29/GRSP/1999/5
19 February 1999

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Construction of Vehicles

Working Party on Passive Safety (GRSP)
(Twenty-fifth session, 3-7 May 1999,
agenda item 2.7.)

PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 94 (Frontal collision protection)

Transmitted by the Expert from Consumers International

Note: The text reproduced below was prepared by the expert from Consumers International in order to use the same concept of pictogram plus test as adopted for child restraints. It is based on the text distributed without a symbol (informal document No. 14) during the twenty-fourth session of GRSP (TRANS/WP.29/GRSP/24, para. 60).

Note: This document is distributed to the Experts on Passive Safety only.

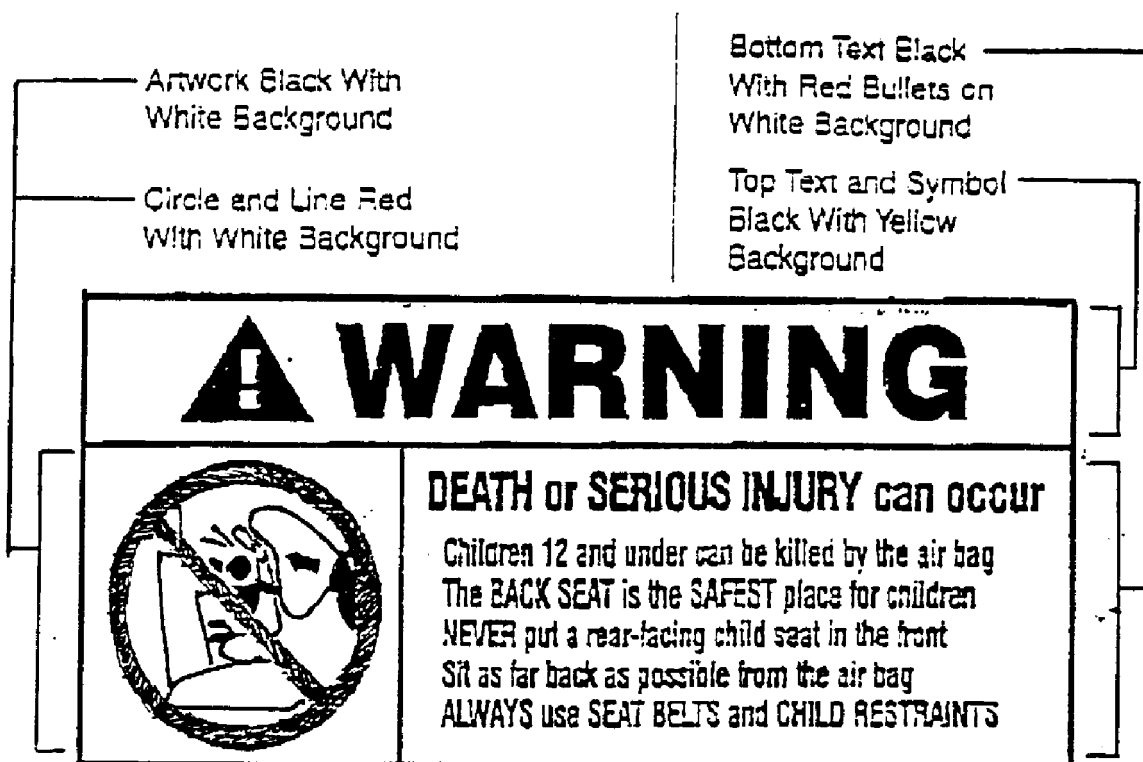
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A. PROPOSAL

Paragraph 6.2.1., amend to read:

"6.2.1. As a minimum, this information shall consist of a pictogram and text label as indicated below. The text shall be in at least one language of the country in which the vehicle is sold.

Label Outline, Vertical and Horizontal Line Black



The label shall have minimum dimensions of 13 x 6 cm."

Paragraph 6.2.2., amend to read:

"6.2.2. The warning label shall be durably affixed to each face of both front sun visors in such a position that at least one label on each sun visor is visible at all times, irrespective of the position of the sun visor.

This requirement assembly when any rearward-facing"

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B. JUSTIFICATION

In a presentation made at the twenty-second GRSP in December 1997 (TRANS/WP.29/GRSP/1997/10), Consumers International (CI) proposed harmonization with legislation in the United States of America to require clear labelling on vehicles and child restraints to warn users of the risks posed by frontal protection airbags on passenger seating positions. It is not acceptable that vehicle users in other countries are given less warning of a fatal hazard than vehicle users in the United States of America.

At the one-hundred-and-sixteenth session of WP.29, GRSP's proposal for the clear labelling of rearward facing child restraints was adopted unanimously (TRANS/WP.29/1998/61). This now leaves the issue of clear labelling of vehicles to be resolved. The warning label applied to child restraints is a combined pictogram and text label very similar to that required on such products in the United States of America. It is proposed that for vehicle labelling GRSP should adopt a similar approach. The fundamentals of the approach could be as follows:

Vehicle labelling should use the same concept of pictogram plus text as has been adopted for child restraints.

The pictogram section of the label should be identical for both child restraints and vehicles.

The text on the label should be required to be in at least one language of the country in which the vehicle is sold. This is the same requirement as that placed on the child restraint manufacturers.

The location and size of the warning label should be standardized, so that users get to know exactly where they might expect to find such information. Current practice of vehicle labelling for this hazard leaves the consumer to search the vehicle for the warning, which is not satisfactory.

The warning should be visible at all times when a child restraint is likely to be installed. The label must be a permanent feature within the vehicle, as the hazard will exist for the life of the vehicle.

The labelling should be introduced fast, as passenger airbags are spreading rapidly into the market.

Labelling should be seen as a short-term measure which will no longer be necessary when sophisticated airbags replace the current versions. As soon as the design of the airbag removes the hazard, labelling will no longer be required.

This argues for rapid adoption and implementation of a uniform labelling policy throughout the new vehicle fleet.

As a final piece of background information, data released on 1 November 1998 by NHTSA listed 121 deaths in minor to moderate crashes involving airbag deployments. These included 48 drivers, 5 adult passengers, 53 children and 15 infants in rearward facing child restraints. The rising accident toll in the United States of America caused NHTSA to go for attention grabbing labels on vehicles and child restraints. Some logical clear action within the ECE is now imperative, in the view of CI. CI requests that the representatives of signatories to the 1958 Agreement and the car industry take urgent action to address this unusual situation where two state of the art safety devices can interact with fatal consequences for young children.

This proposed labelling requirement is somewhat simpler than that adopted by NHTSA in that the current proposal requires a single format of label on both sides of each sun visor. The US rule require a different format for each side of the visor, but it is suggested that the current proposal is simpler and brings the key information to the users attention. In the United States of America a temporary label is required on the facia when the vehicle is first sold. GRSP could consider if it wishes to require such a practice in Europe - if it is seen as desirable. Figure 7 in TRANS/WP.29/GRSP/1997/10 provides a suitable model for a harmonized approach.
