Visually Identifying FMVSS No. 213 Self-Certified CRSs

April 28, 2021
Introduction – Vehicle Safety Act

NHTSA is authorized by the National Traffic and Motor Vehicle Safety Act (Vehicle Safety Act) to issue safety standards for new motor vehicles and new items of motor vehicle equipment sold in the United States.

- NHTSA does not approve or certify any products.
- Each manufacturer is responsible for “self-certifying” that its products meet all applicable Federal motor vehicle safety standards (FMVSSs).
- NHTSA regularly evaluates products for compliance with the standards.
  - If a determination is made that a product is not in compliance with an applicable FMVSS, the manufacturer of the product is subject to recall responsibilities.
- Manufacturers must ensure their products are free of safety-related defects.
Introduction – FMVSS No. 213, “Child restraint systems”

All new child restraint systems (CRS), sold in the U.S. must meet performance requirements and specifications in FMVSS No. 213.

• Frontal impact sled test simulating a 30 mph full frontal rigid barrier crash using different sized dummies.

• As applicable, CRSs are required to:
  o Limit head and chest accelerations
  o Limit head and knee excursions,
  o Limit CRS rotation,
  o Maintain structural integrity, and
  o Maintain general position of the CRS on the seat assembly before and after the test.

• Other FMVSS No. 213 requirements include webbing strength, durability, material flammability, buckle release before and after the test, labeling, compatibility with attaching to the vehicle’s child restraint anchorage system (CRAS), and product registration.

NHTSA has also proposed a side impact sled test.
There are several requirements in FMVSS No. 213 that may help visually identify CRSs that are “self-certified” by the manufacturer including:

- Labeling
- Printed Material
  - Registration Card
  - Instruction Manual
- Attachment Methods

Note: This visual inspection does not guarantee the CRS is compliant.
Labeling Requirements
Labeling Requirements
General

• In English language.
• Letters and numbers that are not smaller than 10 point font.
• White background with black text, unless otherwise specified.
• Sentence capitalization, unless written in all capitals.
• Some labels need to be visible when the CRS is installed in the vehicle.
Labeling Requirements
Certification and Registration

FMVSS Certification

• This child restraint system conforms to all applicable Federal motor vehicle safety standards.

Aircraft Use Certification (Optional) (In red lettering and placed after certification statement.)

• This Restraint is Certified for Use in Motor Vehicles and Aircraft.
• This Restraint is Not Certified for Use in Aircraft.

Registration Information (Inserting address & U.S. telephone number.).

• Child restraints could be recalled for safety reasons. You must register this restraint to be reached in a recall. Send your name, address, e-mail address if available and the restraint’s model number and manufacturing date to ____ or call ________ or register online at __________. For recall information, call the U.S. Government’s Vehicle Safety Hotline at 1-888-327-4236 (TTY: 1-800-424-9153), or go to http://www.NHTSA.gov
Labeling Requirements
Warning Label

Heading
• Statement:

“WARNING! DEATH or SERIOUS INJURY can occur.”

• Yellow background
Optional: White background is allowed on the “DEATH or SERIOUS INJURY can occur.”
# Labeling Requirements
## Warning Label

### Applicable Statements in Following Order

<table>
<thead>
<tr>
<th>Rear Facing (RF) Only</th>
<th>Use only in a rear-facing position when using it in the vehicle.</th>
</tr>
</thead>
<tbody>
<tr>
<td>RF and Forward Facing (FF)</td>
<td>Use only in a rear-facing position when using it with an infant weighing less than ___ (insert a weight not less than 20 lbs).</td>
</tr>
</tbody>
</table>
| **Minimum and Maximum Weight and Height** *(insert values in English and metric units)* | • Use only with children who weigh ____ pounds or less and whose height is ____; or  
• Use only with children who weight between ____ and ____ pounds and whose height is ____ or less and who are capable of sitting upright alone; or  
• Use only with children who weigh between ____ and ____ pounds and whose height is ____ or less; or  
• Use only with children who weigh between ____ and ____ pounds and whose height is between ____ and ____ |
| **CRSs with internal harness** | Snugly adjust the belts provided with this child restraint around your child. |
# Labeling Requirements

## Warning Label

<table>
<thead>
<tr>
<th>CRSs with tether</th>
<th>Secure the top anchorage strap provided with this child restraint.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Booster seats</td>
<td>Use only the vehicle’s lap and shoulder belt system when restraining the child in this booster seat.</td>
</tr>
</tbody>
</table>
| Securing the CRS | Secure this child restraint with the vehicle’s child restraint anchorage system, if available, or with a vehicle belt.  
Note: For car beds, harnesses and belt positioning seats the part of the statement on CRAS is optional. |
| Instructions     | Follow Instructions on this child restraint and in the written instructions located ____ (insert storage location on the restraint for the manufacturer’s installation instruction booklet or sheet). |
| Registration     | Register your child restraint with the manufacturer. |
Labeling Design Examples

Certification Statements in Warning Label

Certification Statements and Registration in different labels
Labeling Requirements
Air bag Warning Label
(Rear-facing CRSs)

Heading:
• Yellow background
• Word “Warning” and an alert symbol in black

Pictogram:
• Black with red circle and slash on white background

Message:
• Area no less than 30 square cm
• Statements:
  • DO NOT place rear-facing child seat on front seat with air bag.
  • DEATH OR SERIOUS INJURY can occur.
  • The back seat is the safest place for children 12 and under.

Location:
• Label permanently attached to the CRS in an area adjacent to the child’s head
• Plainly visible and easily readable
Labeling Requirements
Installation Diagrams

Diagrams showing the CRS installed in:
- A seating position equipped with continuous-loop lap/shoulder belt;
- A seating position equipped with a lap belt,
- A seating position equipped with child restraint anchorage system.
- If the sum of the weight of the CRS (with internal harness) and the maximum child weight recommended for the CRS is greater than 65 lb: Do not install by this method for a child weighing more than ____ (insert child weight limit in English units).
Labeling Requirements
Manufacturing Information

• Model name or number of the system

• Manufacturer’s name
  • Or distributor who assumes responsibility for all duties and liabilities.

• The statement: "Manufactured in_____" (insert month and year of manufacture).

• Place of Manufacture
Registration Card
General

• Registration form attached to the CRS to any surface that contacts the dummy when the dummy is positioned in the system.

• Each form shall:
  • Consist of a postcard attached to an informational card;
  • Conform in size (3 x 5 inches minimum), content and format to Figures 9a and 9b of FMVSS No. 213; and,
  • Have thickness between 0.007 to 0.0095 inches.
Manufacturers may voluntarily provide a web address on the informational card to register CRSs online.
• Each postcard shall:
  • Provide space for purchaser to record his or her name, mailing address and optionally e-mail address.
  • Provide the model name or number and date of manufacture.
  • Be addressed to the manufacturer with prepaid postage.
  • No other information shall appear on the postcard.
Instruction Manual

• Step by step guide on how to use the CRS.
• Location to store the instructions.
• Registration statements.
• Air bag warning for rear facing CRSs.
• Booster seat warning (use with lap shoulder belt only).
• Installation diagrams with lower anchorage attachment weight limits.
Installation Method Requirements

CRSs (other than car beds, harnesses, and booster seats) are required to have lower anchorage attachments.
Installation Method Requirements

CRS must not have any means (other than lower anchorage attachments and tether components) designed for attaching the system to a vehicle seat cushion or vehicle seat back and any component (except belts) that is designed to be inserted between the vehicle seat cushion and vehicle seat back.

Note: Harnesses for exclusive use in school buses with proper labeling may have seat back mount attachments.
Complaint Process
Reporting CRS Complaints – NHTSA.gov

https://www-odi.nhtsa.dot.gov/ivoq/Complaint.cfm

NHTSA.gov → Report a problem → Non-Vehicle (menu on left)
Consumer Complaint Process

NHTSA Screens Complaint for Safety Issues
Every complaint reviewed, and may be selected for further follow-up with consumer, and/or advanced for further analysis.

Decision Made On Next Steps
Open formal investigation and/or monitor manufacturer recalls.

Continue to monitor and reassess safety issue as necessary.

Consumer Submits Complaint
Vehicle Owner’s Questionnaire (VOQ) submitted via website, telephone or mail.

All Complaints Posted On NHTSA Website
www.nhtsa.gov/recalls

NHTSA Analyzes Safety Issue
Technical analysis conducted to assess potential safety risk to determine severity of safety hazard, likelihood of occurrence, and population size of affected vehicles.

Agency technical experts review each and every call, letter, and online report of an alleged safety problem filed with NHTSA.
Consumer complaints of alleged counterfeit car seats are forwarded to Stopfakes.gov

To directly report a problem, visit:
https://www.stopfakes.gov/Contact-Us
Thank you!