FEDERAL PUBLIC SERVICE

MINISTRY OF DEVELOPMENT, INDUSTRY AND FOREIGN COMMERCE
NATIONAL INSTITUTE OF METROLOGY, STANDARDIZATION AND QUALITY - INMETRO

Ordinance no. 038, January 29, 2007.

THE PRESIDENT OF THE NATIONAL INSTITUTE OF METROLOGY, STANDARDIZATION AND QUALITY - INMETRO, in the exercise of his duties, granted under paragraph 3 of article 4 of Law no. 5.966, of December 11, 1973, in item I of article 3 of Law no. 9.933, of December 20, 1999, in item V of article 18 of the Autarchy Regimental Structure, approved by Decree no. 5.842, of July 13, 2006;

Whereas item f of subitem 4.2 of the Reference Term of the Brazilian Conformance Assessment System, approved by Resolution Conmetro no. 04, as of December 2, 2002, which assigns to Inmetro the authority to establish guidelines and criteria for the conformance assessment activity;

Whereas the need to provide more safety to children while using the Child Restraint Device, in cases of car crash or sudden deceleration;

Whereas that, for this purpose, it is necessary to establish, by way of a Conformance Assessment Regulation (RAC – *Regulamento de Avaliação de Conformidade*), the minimum safety requirements to manufacture, import and test of such safety devices;

Whereas it is indispensable to regulate the Child Restraint Device manufacturing and imports segment**,** aiming at bringing more quality to the sector and more safety to the product user, hereby resolves enact the following provisions:

Article 1 Approve the Conformance Assessment Regulation on Child Restraint Device, made available on the website www.inmetro.gov.br or to the address indicated below:

National Institute of Metrology, Standardization and Quality - Inmetro
Conformance Assessment Programs Division – Dipac
Rua Santa Alexandrina n.º 416 - 8º andar – Rio Comprido
20261-232 Rio de Janeiro / RJ

Article 2 To institute, in the sphere of the Brazilian Conformance Assessment System – SBAC, a compulsory certification for Child Restraint Device, which shall be in compliance with the provisions of the Conformance Assessment Regulation on Child Restraint Device, approved hereby.

Article 3 To determine what manufacturers and importers of Child Restraint Device will have ten (10) months, as of the date of publication of this Ordinance, to make their products compliant with the requirements specified in the Regulation, approved hereby.

Sole Paragraph – The test reports on the Child Restraint Device presented by manufacturers or importers, issued six (6) months before the publication of the present Ordinance, shall have their acceptance conditioned to an analysis by the Product Certification Agency – OCP, at to the product construction characteristics.

Article 4 To establish that the Child Restraint Device, which were manufactured or imported before the publication of this Ordinance, may be traded in the domestic market until March 30, 2008.

Article 5 To determine that the inspection of the performance of provisions set forth in this Ordinance, in the whole domestic territory, shall be liable to Inmetro and entities of public associated thereto.

Article 6 This Resolution shall be enforced on the date of its publication in the Federal Registry.

JOÃO ALZIRO HERZ DA JORNADA

CONFORMANCE ASSESSMENT REGULATION ON CHILD RESTRAINT DEVICE

1 OBJECTIVE

To establish, the criteria for the conformance assessment program on Child Restraint Device, focused on safety, by means of the compulsory certification system, in compliance with the requirements specified in the ABNT standard NBR 14400, aiming at increasing safety in the transportation of children in automobile vehicles.

2 SUPPLEMENTARY DOCUMENTS

Inmetro Ordinance no. 073:2006	Approves the Regulation on the use of Inmetro Brands, Accreditation Symbols and Identification Seals
ABNT NBR 14400:1999	Road Vehicles – Child Restraint Device
ABNT NBR ISO 9001: 2000	Quality Management Systems – Fundaments and Vocabularies.
ABNT NBR ISO/IEC 17000:2005	Conformance Assessment – Vocabulary and General Principles
ABNT NBR 5426:1985	Sampling Plan and Inspection Procedures per Assignment

3 DEFINITIONS

For the purposes of this RAC, definitions 3.1 to 3.15 are adopted, supplemented by the definitions set forth in ABNT standard NBR 14400, ABNT NBR ISO/IEC 17000 and in ABNT NBR ISO 9001.

3.1 Accessories

Components attached to the Child Restraint Device, not contemplated by the certification process of the same.

3.2 Original Components

Child Restraint Device components originally manufactured, or components that are recommended by the manufacturer or importer**.**

3.3 Child Restraint Device

Set of elements comprising a combination of harness straps with lock buckle, adjustment device, fixation parts and, in some cases, devices such as: stroller system, infant car seat and/or impact protection, which shall be fixed in the vehicle. These devices are designed to reduce risk to users, in case of car crash or sudden vehicle deceleration, minimizing impact to the child's body. Examples of child safety devices: infant car seat (restraints child while lying down) and safety seat (holds child in position while sitting).

3.4 Initial Test

The test performed with a sample of the product, which represents a continuous manufacturing process, aiming at evidencing conformance with ABNT standard NBR 14400.

3.5 Maintenance Test

The test performed with a sample of the product, which represents a continuous manufacturing process.

3.6 Mass Group
Classification of child mass, for use in Child Restraint Device.

3.7 Conformance Identification Seal
The Conformance Identification Seal fixed on the product according to the criteria set forth by Inmetro, based in the principles and policies adopted in the sphere of SBAC, indicating an adequate level of trust that the product is in conformance with ABNT standard NBR 14400 and assuring the traceability of the product.

3.8 Authorization for the Use of Conformity Identity
Document issued according to the criteria set forth by Inmetro, based in the principles and policies adopted in the sphere of SBAC, by means of which OCP grants a company, by means of an agreement, the right to use the Conformance Identification Seal in the sphere of SBAC in their products, in compliance with this RAC.

3.9 Manufacturing Batch
Set of Child Restraint Device, of one same model, defined and identified by the manufacturer, manufactured in a determined period.

3.10 Importation Batch
Set of Child Restraint Device, of one same model, covered by an importation license, identified and defined by the importer.

3.11 Installation Manual
It is the printed material, including the installation information for the Child Restraint Device.

3.12 Specifications
A report prepared by the manufacturer or importer, including the complete description of the components and building characteristics of a model Child Restraint Device.

3.13 Model
Designation given to the union of single characteristics of one determined Child Restraint Device, manufactured according to the mass groups defined un the ABNT standard NBR 14400, as to safety aspects, material, processes and other standardizing requirements.

3.14 Product Certification Agency
Third party public agency, private or mixed, and accredited by the Inmetro, according to the criteria established by it, based on the principles and policies adopted in the sphere of SBAC.

3.15 Version
The variation of on Child Restraint Device model, which presents the same building characteristics and the same performance in the conformance tests to ABNT standard NBR 14400.

4 ACRONYMS

ABNT	*Associação Brasileira de Normas Técnicas* [Brazilian Association of Technical Standards]
CNPJ	*Cadastro Nacional de Pessoa Jurídica* [Brazilian Revenue Service Registry of Legal Entities]
Conmetro	*Conselho Nacional de Metrologia, Normalização e Quality Industrial* [National Council of Metrology, Standardization and Industrial Quality]
EA	European Cooperation for Accreditation

IAAC	Interamerican Accreditation Cooperation
IAF	International Accreditation Forum
ILAC	International Laboratory Accreditation Cooperation
Inmetro	National Institute of Metrology, Standardization and Quality
ISO	International Organization for Standardization
MOU	Memorandum of Understanding
NBR	Brazilian Standard
OCP	Product Certification Agencies
RAC	Conformance Assessment Regulation
SBAC	Brazilian Conformance Assessment System

5 CONFORMANCE ASSESSMENT SYSTEM

The Conformance Assessment System selected for the Child Restraint Device is the certification.

5.1 This RAC establishes two (2) distinct models to obtain Authorization for the Use of the Conformance Identification Seal.

5.2 The applicant is responsible for the deliverance, to OCP, of the model that shall be used for the certification of their products.

6 CONFORMANCE ASSESSMENT PROCESS STEPS

6.1 Model with Evaluation of the Manufacturer Quality Management System and Tests of Products

6.1.1 Certification Request

The application shall include the name of the model, mass group, version and specifications (Annex B) and Installation Manual of the Child Restraint Device (Annex E), along with the documentation of the Manufacturer's Quality Management System, developed to meet the provisions of the Annex C hereof.

Note: The presentation of the Quality Management System Certificate, issued at SBAC, based on ABNT standard NBR ISO 9001, and being this certification valid for the production of the Child Restraint Device, subject matter of the application, shall exempt the holder of such certificate of the evaluations of the Quality Management System set forth herein, for as log as it is valid, provided all the items of the Annex C are monitored during each periodic assessment. In this case, the OCP shall verify the reports issued by the Quality Management System Agency, the process control records and the product tests and inspections records.

6.1.2 Documents Analysis

The OCP shall analyze the Quality Management System documents, giving priority to controls related to the manufacturing stages of the products that will be certified. It shall also analyze the Installation Manual and Specifications of the Child Restraint Device.

6.1.3 Initial Assessment

After analysis and approval of the application and documents, the OCP, upon agreement with applicant, program and performance of initial assessment of the manufacturer's Quality Management System, based on Annex C.

6.1.4 Type Test

6.1.4.1 Sampling

The OCP shall collect (per model) a sample of the Child Restraint Device (proof test, control assay and testimony), manufactured in equal amounts for each mass group, as per table 2.

Table 1 – Distribution of mass groups for tests

Mass groups	Characteristics
Group 0	For children up to 10 kg, approximate height 0.72m, up to 9 months of age;
Group 0+	For children up to 13 kg, approximate height 0.80m, up to 12 months of age;
Group I	For children from 9 kg to 18 kg, approximate height 1 m, up to 32 months of age;
Group II	For children from 15 kg to 25 kg, approximate height 1.15 m, up to 60 months of age;
Group III	For children from 22 kg to 36 kg, approximate height 1.30 m, up to 90 months of age;

Sampling (proof test, control assay and testimony) of each retention device model chosen for the tests, shall meet the amount of samples described in table 2.

The OCP provide the tests (per model) of each sample, using table 2.

Table 2

MASS GROUP	NUMBER OF SAMPLES
GROUP 0 or I or II or III	4 SAMPLES
GROUP 0 and I	6 SAMPLES
GROUP 0, I and II	8 SAMPLES
GROUP I and II	6 SAMPLES
GROUP I, II and III	8 SAMPLES

In case the test laboratory needs more samples to perform all tests, the OCP should perform a new sampling and sent it to the laboratory.

6.1.4.2 Tests

After the initial assessment, the OCP should carry out all tests stated in ABNT standard NBR 14400, according to table 3 below:

Table 3 – Initial and Maintenance Tests

ABNT 14400	TEST	SAMPLE IDENTIFICATION NO.
7.1.1	CORROSION	1
7.1.2	ROLL-OVER	1
7.1.3	DYNAMIC	
Group 0	Newly born/ rear facing/ frontal impact of newly born/ rear facing/ rear impact 9 Kg dummy/ rear facing / frontal impact 9 Kg dummy / rear facing / rear impact	1 2 3 4
Group 0+	Newly born/ rear facing/ frontal impact of newly born/ rear facing/ rear impact 11 Kg dummy/ rear facing / frontal impact 11 Kg dummy / rear facing / rear impact	1 2 3 4
Group I	9 Kg dummy/ forward facing / frontal impact Dummy 15 Kg / forward facing / frontal impact	1 2
Group II	15 Kg dummy/ forward facing / frontal impact Dummy 22 Kg / forward facing / frontal impact	1 2
Group III	22 Kg dummy/ forward facing / frontal impact Dummy 32 Kg / forward facing / frontal impact	1 2
7.2.1.1	FORCE LOADED BUCKLE OPENING TEST	1
7.2.1.2	UNLOADED BUCKLE OPENING TEST	1
7.2.1.3	BUCKLE RESISTANCE	2
7.2.2.1	EASY MANAGEMENT OF ADJUSTMENT DEVICE	2
7.2.3	MICROSLIDING	2
7.2.4.1	RETRACTOR ROLL UP	3 (WHEN APPLICABLE)
7.2.4.2	DURABILITY OF RETRACTION MECHANISM	3 (WHEN APPLICABLE)
7.2.4.3	RETRACTORS LOCKING	3 (WHEN APPLICABLE)
7.2.4.4	CORROSION RESISTANCE	3 (WHEN APPLICABLE)
7.2.4.5	DUST RESISTANCE	3 (WHEN APPLICABLE)
7.2.5.1	STATIC TEST OF HARNESS STRAPS RESISTANCE	4
7.2.7	CONDITIONING TEST FOR ADJUSTERS DIRECTLY MOUNTED ON A CHILD RESTRAINT DEVICE	4

NOTE: For all mass groups the laboratory shall consider the following provisions:
1 If the child retention device can be used for two or more mass groups, the tests shall be carried out with lighter / heavier test dummies, specified for all the groups at hand.
2 If the child retention device is designed for two or more children, the tests shall be carried out with the heavier test dummy occupying all seat positions and a second test with the lighter and the heavier dummy.
3 O laboratory may, should they find it necessary, add a third test with different dummy combinations or carry it out with empty places.

6.1.4.3 Acceptance and Rejection Criteria

For the certification, all samples need to be in conformance with ABNT standard NBR 14400. In case of denial, the tests may be repeated with new samples, which sampling is equivalent to that of the products disqualified, for the accomplishment of the tests, control assay and testimony, for the non-confirming aspect. In case of rejection in the dynamic text (item 7.1.3 of ABNT NBR 14400), the tests de control assay and testimony shall be carried out with all samples. .

6.1.5 Reference sample

The OCP shall make available to the laboratory one (1) Child Restraint Device, per model, to be used as reference. The laboratory shall be responsible for the reference sample. The reference sample shall only be returned or taken by the applicant to the certification after the substitution for the same model tested in the maintenance, being the minimum term 18 months.

6.1.6 Maintenance of Authorization for the Use of the Conformance Identification Seal.

6.1.6.1 Granting Control

The OCP shall be granted exclusive control after the authorization for the use of the Conformance Identification Seal, planning new periodic assessments and tests to confirm if the technical and organizational conditions, which originated the initial granting of the authorization, have been kept. The frequency of assessment and tests shall be 18 months.

6.1.6.2 Maintenance Assessment

O OCP shall carry out, at least, one assessment every 18 months, of the manufacturer's Quality Management System, according to the Annex C of this RAC, in each authorized company, and other assessments may be performed, provided that, as per resolution of the Certification Commission, based on evidenced that justify it.

6.1.6.3 Sampling

The OCP shall carry out, every 12 months, a complete test in, at least, 25% of the models certified. For the performance of these tests, the amount of samples of the Child Restraint Device described in table 2 for each model chosen for the tests shall be collected in the market (proof test, control assay and testimony).

6.1.6.4 Tests

6.1.6.4.1 The OCP shall carry out the maintenance tests for models that were not tested in the previous maintenance, as defined in Table 2.

6.1.6.4.2 The manufacturer shall also carry out routine tests, according to the ABNT standard NBR 14400, for the model/mass groups that still have not been contemplated by the maintenance test 6.1.6.4.

6.1.6.4.3 In case any non-conformance is verified in the test for maintenance of the certification, the model disqualified may be tested again, after the corrective actions have been carried out. In this case, the tests may be repeated for two new samples (control assay and testimony), for the non-confirming aspect, and the same shall not be accepted in case any non-conformance is verified. Should the non-conformance persist in this test, this shall cause the immediate suspension of the Authorization of the Use of the Conformance Identification Seal for the model disqualified.

6.1.6.4.4 The model disqualified shall be tested again, after the corrective actions have been carried out. In case the disqualified and excluded from the authorization is disqualified once again in this test, all models granted the Authorization for the Use of the Conformance Identification Seal shall be tested for the non-conforming aspect.

6.2 Model with Batch Certification

6.2.1 Certification Request

6.2.1.1 The applicant shall deliver to OCP, their choice for the certification model for the assessment of a batch of the product.

6.2.1.2 Attached to the application shall be the identification of the batch subject to certification, the Installation Manual (Annex E) and the Specifications (Annex B) of model(s) of child car safety device(s) that comprise the said batch, as well as the amount of the same.

6.2.2 Documents Analysis

The OCP shall, in case of importation, confirm in the Importation License the identification of the batch (brand/model/mass group and amount), prepare the Statement of Commitment (Annex F) and Request for Statement of Exemption of Sample Release (Annex G), and forward it Inmetro for authorization and release of samples for tests of the batch for certification. It shall also analyze the Installation Manual and Specifications of the Child Restraint Device. In case of national manufacturer, the OCP shall assess all the documents mentioned in sub-item 6.2.1.2.

6.2.3 Sampling

For the performance of the tests for certification of the batch, the OCP shall carry out the collection of the samples described in table 2 (test, control assay and testimony) of Child Restraint Device, for each model chosen for the tests of batch.

The OCP provide the tests (per model) of each sample, using table 3.

In case the test laboratory needs more samples to perform all tests, the OCP should perform a new sampling and sent it to the laboratory.

6.2.4 Batch Acceptance Criteria

For the certification of the batch all samples need to be in conformance with ABNT standard NBR 14400. In case of rejection, the tests must be repeated with new samples (control assay and testimony).

6.2.5 Reference sample

The OCP shall make available for the laboratory one (1) Child Restraint Device, per model, to be used as reference. The laboratory shall be responsible for the reference sample. The reference sample shall only be returned or taken by the applicant for the certification after a minimum of 18 months.

7 CONFORMANCE IDENTIFICATION SEAL

7.1 The Authorization for the Use of the Conformance Identification Seal shall include the following data:

a) corporate name, business name (when applicable) and CNPJ of the authorized;
b) full address;
c) Authorization number for the use of the Conformance Identification Seal, date of issuance and authorization validity;

d) batch identification (LI #, amount, manufacturing date and serial # of the Conformance Identification Seal), when applicable; e) complete identification of the certified product including reference to models, sizes and versions; f) name, registration # and OCP's signature.

7.2 The authorized company shall hold technical, civil and penal liability for the products it manufactures or imports, as well as for all documents related to the certification, and under not circumstance will such liability be assigned to any third party.

7.3 The Authorization for Use of the Conformance Identification Seal, as well as its use on products shall not transfer, in any case, the licensee's liability to Inmetro and/or to the OCP.

7.4 The Authorization for Use of the Conformance Identification Seal shall only be granted after the execution of the contract between the OCP and the applicant, and after the consolidation and approval of tests and assessments.

7.5 The Conformance Identification under the SBAC for Child Restraint Devices is intended to indicate an adequate level of trust that the products are in conformance with ABNT standard NBR 14400.

7.6 The Conformance Identification Seal, as specified in the FOR-DQUAL- 144, attached to this regulation, shall be placed on the Child Restraint Device, visibly, by affixing it on the certified products.

7.7 The Conformance Identification Seal shall meet the requirements of this regulation, and it shall be deemed the authorized company's liability, e Inmetro may, at any time, request a sample of the seals made to verify their conformance.

7.8 The authorized company shall be free and responsible for the choice of the printing company to print and supply the Conformance Identification Seal.

7.9 The OCP shall be responsible for the supervision of the Conformance Identification Seal, and it shall be entitled to Inmetro, when required, the concession of the sequence and traceability of the numbering used.

7.10 The manufacturing of the Conformance Identification Seal shall be conditioned to the supplying, by Inmetro, of the sequence numbering to be used. This information shall be requested to Inmetro by the OCP by means of the FOR-DQUAL-020 form, available at Inmetro website (http://www.inmetro.gov.br), upon assessment of the applicant's productive capacity.

7.11 For imported batches, the OCP, shall consider the Conformance Identification Seal in the amount stated in the Importation License, not including the samples for the respective tests.

7.12 The authorized company shall keep a register of the sequential control of the numbered seals in stock and those in the child restraint devices. For the specific case of those in the devices, such register shall contain, at least, the following information:

a) series number or batch identification;
b) manufacturing date;
c) models and weight groups;

7.13 Compulsory information on the product

For the purposes of this RAC, the following information, complemented by those set forth in item 9.1 of ABNT standard NBR 14400, shall be placed on the child restraint device, in such a clear and indelible manner:

a) corporate name / manufacturer's d.b.a. / importer;
b) manufacturer's/importer's address;
c) month and year of manufacture;
d) weight group of child restraint device;
e) denomination of certified model;
f) number and year of technical standard;
g) Authorization number for the use of the Conformance Identification;
h) Inmetro's Conformance Identification Seal, with number of the OCP, clearly marked,

and in a lasting manner;
i) the saying: "IF THIS PRODUCT HAS BEEN SUBMITTED TO VIOLENT STRAIN IN AN ACCIDENT, PLEASE REPLACE IT IMMEDIATELY".

8 ACCEPTANCE OF THE CONFORMANCE ASSESSMENT ACTIVITIES ABROAD

Products made in Brazil, even if they present a project of products manufactured and certified abroad, shall follow the requirements set forth in sub-item 6.1.4.2.

8.1 Activities performed by Foreign OCP

Conformance assessment activities carried out by foreign agencies can only be accepted upon the following conditions:
a) if the accreditation foreign agency is a signatory or IAF;
b) if the foreign OCP has signed a Memorandum of Understanding – MOU with the Brazilian OCP accredited by Inmetro, and the foreign OCP shall comply with the criteria adopted by Inmetro for accreditation;
c) the activities carried out by the foreign OCP shall be carried out according to the same criteria set forth in the RAC, and the procedures to comply with such criteria shall be equivalent to those of the national OCPs. Such criteria and procedures shall be established in the MOU;
d) if Inmetro approves the Memorandum of Understanding – MOU;
e) the prediction of reciprocal acceptance of activities among the OCPs.

8.2 Tests Carried out by Foreign Laboratories

For the acceptance of test reports issued by foreign laboratories, it is required that:
a) the test laboratories are accredited by accreditation agencies that are signatory of mutual acknowledgment agreements, set forth by one of the corporations listed below:

- Interamerican Accreditation Cooperation – IAAC;
- European Cooperation for Accreditation – EA;
- International Laboratory Cooperation – ILAC; [sic]

b) the equivalence of the accredited scope of the product being assessed;
c) the similarity of the established sampling methodology.

Note: If requirements of foreign standards are more demanding than those set forth in the NBR 14400 standard, the OCP shall acknowledge the tests for certification purposes. The test report shall include, at least, the model name, mass group, date of test and batch manufacture date

9 USE OF NATIONAL LABORATORIES

9.1 If there is a laboratory accredited by Inmetro, the OCP shall use the laboratory of a third party accredited by Inmetro.

9.2 If there is no laboratory accredited by Inmetro, the OCP shall use the laboratory of a third party assessed by the OCP, according to the requirements ser forth in Annex D.

10 AUTHORIZED COMPANY LIABILITIES

10.1 To comply with all the conditions set forth in ABNT standard NBR 14400, in the legal provisions and contract provisions related to the authorization, regardless of its transcription.

10.2 To commercialize child restraint devices in conformance with ABNT standard NBR

14400 and apply the Conformance Identification Seal in the certified child restraint devices according to criteria set forth herein.

10.3 To comply with the decisions made by the OCP with regards to the certification, ultimately resorting to Inmetro in case of claims and appeals.

10.4 To keep the technical and organizational conditions to give grounds to obtain the Authorization for the Conformance Identification Seal Use.

10.5 To immediately communicate OCP in case specifications are altered.

10.6 To immediately communicate OCP in case the certified child restraint device model ceases to be manufactured or imported, and it shall immediately return the original copy of the Authorization for the Conformance Identification Seal use and destroy the Conformance Identification Seals not used.

10.7 To settle all the expenses arising from the conformance assessment program with Inmetro, through the payment set forth for the use of the Conformance Identification Seal.

10.8 The authorized company shall use the Conformance Identification Seal in all the certified child restraint devices that shall be commercialized in the domestic market.

11 OCP'S LIABILITIES

11.1 To implement the conformance assessment program for child restraint devices, pursuant to the requirements set forth herein, resolving any doubts directly with Inmetro, which becomes responsible for the OCP's accreditation and for the follow up on the conformance assessment program.

11.2 To use the database system offered by Inmetro to keep the information on certified products updated, on prior to five (5) days after the occurrence.

11.3 To immediately notify Inmetro, in case of suspension, extension, reduction and cancellation of the certification, through written document, as well as to feed the database systems provided by Inmetro.

11.4 To submit to Inmetro for analysis and approval the Memoranda of Understanding-MOU, in the scope of this RAC, set forth with other accredited OCPs.

12 UNDUE APPLICATION OF THE CONFORMANCE IDENTIFICATION SEAL

12.1 The certified company that unduly uses the Conformance Identification seal shall be subject to penalties, pursuant to the provisions set forth in Inmetro Ordinance No. 73, of March 29, 2006.

ANNEX A

FOR-DQUAL-144 FORM

SPECIFICATIONS OF CONFORMANCE IDENTIFICATION SEAL

1 – <u>Product or Service with Assessed Conformance:</u> Child restraint devices.

2 – <u>Design</u>

	**Typical Design Content (Layout)** Mechanism: AC Certification Object Field Safety: Compulsory Dimensions: 50mm X 30mm

3 – Application Conditions and Use of Seal

- **Surface to be applied:**

☒ Plain ☐ Curved ☒ Smooth ☐ creased

- **Surface kind:**

☐ Glass ☐ Paper ☒ Plastic of synthetic material ☐ Metal ☐ Wood ☐ Rubber

☐ Other (specify):

- **Environmental Conditions:**

- **In application:** Temperature URA
- **Throughout product lifecycle:** Temperature URA *URA – Relative Air Humidity

- **Expected length of seal lifecycle in years:** 05

- **Requests made during the handling of product with conformance identification seal:** transport, facilities, storage, tidiness, heat, cold, damp exposure.

- **Application:**

☒ Manual ☐ Mechanical

4 – <u>Expected properties for the seal</u>

♦ Color: **Pantone 1235 100% 80% Pantone Black 100% CMYK - C0 M27 Y76 K2 / C0 M20 Y75 K2 / C0 M0 Y0 K100**

♦ Adhesion Force / Chunking**:** 0.7N/mm (After 72h of application, kept in an environment at 23+/-1ºC and URA of 50+/- 2%) N

♦ Color stability: it will be assessed after the weathering tests. h

♦ **Resistance to Weathering:**

• Humid Atmosphere**: 72h at 23+/- 1ºC and UR of 50+/- 2%; 24h at -10ºC; 6 weeks at 50+/- 2% and 97% +/- 3% of URA; 90 days in warming chamber with air circulation at 80+/- 1ºC and 48 h of distilled water immersion.** h

• Ultra Violet: 720 h

• Solvents: - h (specify)

• Chemicals: h (specify) toluene, kerosene, diesel, gasoline, and detergent.

♦ **Resistance to Shearing:** The adhesive must resist to a 1 kg load applied for 13 h, with no slippage. Surface and bonding: 17cm x 2.5 cm. kg/cm²

5 - <u>Holographic Mark</u>

☒ Safety (exclusive safety design) ☐ Fantasy (decorative purpose)

6 - <u>Other Seal Characteristics</u>

☒ Franchising (Destruction device to attempt the seal removal, making its reuse not possible)

☒ Bank-note style with Anti-scanner (Device to avoid scanned copies or printed copies) distorted positive micro letters.

☐ Shading Background (Various Colors)

☒ Sequential Numbering (Seal number for traceability)

☐ Micro-test with Technical Failures (Micro-letters not bigger than 0.4 mm, with intentional failures kept secretly)

☒ Application of Variable Data (Company, organisms and sequential data)

ANNEX B

SPECIFICATIONS

Specifications for each model of child restraint device must be created, and it must have, at least, the following information:

SPECIFICATION No. _____

1. GENERAL DATA

MANUFACTURER'S/IMPORTER/S CORPORATE NAME:
MANUFACTURER'S/IMPORTER'S ADDRESS:
MANUFACTURER'S/IMPORTER'S D.B.A.
CHILD RESTRAINT DEVICE MODEL:
VERSION*:
WEIGHT GROUP (in Kg):

*****(Please refer to item 2 observation)

2. BUILDING CHARACTERISTICS

MATERIAL: (ABS, Fiberglass, Polypropylene, etc.).
ADJUSTMENTS
OTHER

Note: Only those versions of child restraint device models that comply with the following building characteristics will be able to be classified as such:
– structure;
– material;
– restraint system configuration;
– buckle.

3. RESTRAINT SYSTEM

– Distinguish the restraint system type (fast locking, double D or others). – Attach photos of the restraint system.

4. ACCESSORIES:

If the child restraint device has any accessory, please briefly describe which accessories they are, the material used and the corresponding devices.

The accessories, as they do not present a safety function, are not contemplated by the certification process.

Note: Only accessories that do not hinder the child's safety will be allowed, and therefore accessories with sharp edges, long cords and other items that offer risks to the users will not be permitted.

The manufacturer/importer must describe, in the Installation Manual, the correct use of such accessories.

5. STATEMENT

Statement that the materials used for the manufacturing of the child restraint device are appropriate for its use, in particular those in contact with the child's skin, that such materials are known for not presenting any alterations due to the effect of sweat or personal hygiene products and for not causing dermatologic problems.

The manufacturer shall inform the OCP about all alterations and check the adequacy of the materials employed in the manufacturing of child restraint devices.

6. POSITIONING OF COMPULSORY MARKS

MANUFACTURER'S AND OR IMPORTER'S MARK Indicate positioning in the product.
WEIGHT GROUPS INDICATION: Indicate positioning in the product and
how they are classified.
CONFORMANCE IDENTIFICATION (seal): Indicate positioning in the product.

7. SCHEMATIC PROJECT

Attach project in two views: front and side.

Schematic projects must present all the terminology, such as, for instance, height adjustors, safety straps, etc.

DOCUMENT DATE

SIGNATURES OF PEOPLE IN CHARGE OF THE COMPANY

Analyzed by OCP on: ____/____/ _____

ANNEX C

MINIMUM REQUIREMENTS FOR THE ASSESSMENT OF MANUFACTURER'S QUALITY MANAGEMENT SYSTEMS

ITEMS	ABNT NBR ISO 9001 : 2000
Quality manual	4.2.2
Documents control	4.2.3
Register control:	4.2.4
Product planning	7.1
Acquisition process	7.4.1
Acquisition information	7.4.2
Acquired product verification	7.4.3
Production and service supply control	7.5.1
Identification and traceability	7.5.3
Product preservation	7.5.5
Product measurement and monitoring	8.2.4
Non-compliant product control	8.3
Continuous improvement	8.5.1
Corrective actions	8.5.2
Preventive actions	8.5.3

ANNEX D

GENERAL REQUIREMENTS FOR THE ASSESSMENT OF NON-ACCREDITED TEST LABORATORIES

1. CONFIDENTIALITY

1.1 The laboratory shall have documented and implemented procedures to comply with the confidentiality term and integrity of information, considering, at least:
a) access to files, including computer ones;
b) restrict access to the laboratory;
c) knowledge of the laboratory personnel regarding the confidentiality of said information.

2. ORGANIZATION

2.1 The laboratory shall assign the signatories of the test reports and have total technical responsibility for its content.

2.2 The laboratory must have a technical manager and a deputy (whichever denomination he/she may have) with global responsibilities for its technical operations.

2.3 When this is a first party laboratory, the responsibilities of the organization key personnel who are involved with or influence the laboratory tests must be defined, so as to identify possible conflicts of interest.

2.3.1 It is also pertinent that organizational arrangements are as such so that departments with potential conflict of interests, such as production, commercial marketing or financial, do not negatively influence the conformance of such laboratory with the requirements herein.

3. MANAGEMENT SYSTEM

3.1 All necessary documents for the correct performance of activities of the laboratory at hand shall be identified univocally and contain the issuance date, the revision number and issuance authorization.

3.2 All necessary documents for the correct performance of activities of the laboratory at hand shall be updated and accessible to its personnel.

3.3 The laboratory shall document the attributions and responsibilities of the technical manager and of the technical staff involved in the tests, considering, at least the responsibilities about:
a) test performance;
b) test planning, results evaluation and test report issuance;
c) modification, development, characterization and validation of new test methods;
d) managing activities.

3.4 The laboratory shall have the identification of the authorized signatories (whenever this concept is applicable).

3.5 The laboratory shall have documented and implemented procedures to obtain measurement traceability.

3.6 The laboratory shall formalize the range of its services and provisions to guarantee it has appropriate facilities and resources.

3.7 The laboratory shall have documented and implemented procedures to handle the test items.

3.8 The laboratory shall have a list of equipment and reference standards used, including their corresponding identification.

3.9 The laboratory shall have documented and implemented procedures for feedback and corrective measures, whenever there is non-conformance with the tests.

4. PERSONNEL

4.1 The laboratory shall have enough staff, with the appropriate schooling, training, technical knowledge and experience for the assigned positions.

4.2 The laboratory shall have procedures for the use of technicians in training processes, establishing, for such, their registration as supervisors and creating mechanisms to guarantee that their use is not to impair the test results.

4.3 The laboratory shall have and keep updated register of all its technical staff involved in the tests. Such registers shall have authorization date, at least, to:
a) carry out different types of sampling, when applicable;
b) carry out different types of tests;
c) sign the test reports; and
d) operate different types of equipment.

5. FACILITIES AND ENVIRONMENTAL CONDITIONS

5.1 The laboratory facilities, test areas, energy sources, lighting and air circulation shall make the appropriate test performance possible.

5.2 The laboratory shall have effective monitoring facilities, and control and register of environmental conditions, whenever necessary.

5.3 The laboratory shall keep an effective separation between neighboring areas, whenever there are incompatible activities.

6. EQUIPMENT AND REFERENCE MATERIAL

6.1 The laboratory shall have all equipment, including reference materials for the correct performance of tests.

6.2 Before a test, the laboratory shall verify if any equipment items has presented anomalous results. If that is the case, such piece of equipment shall be placed and identified as out-or-order, repaired and tested by calibration, verification or assay, and checked for satisfactory operation before it is placed in use again.
6.3 Each equipment shall be labeled, marked or identified, to indicate its calibration state. Such calibration state shall indicate the last and next calibration, in a visible way.

6.4 Each equipment shall have a registration that indicates, at least:
a) equipment name;

b) manufacturer's name, type identification, serial number or other specific identification;
c) receipt conditions, when applicable;
d) manufacturer’s instructions copy, when applicable;
e) dates and results of calibrations and/or verifications and date of next calibration and/or verification;
f) details of maintenance carried out and planned ones for the future;
g) history of each damage, modification or repair.

6.5 Each reference material must be labeled or identified, to indicate the certification or standardization. The label shall contain, at least:
a) reference material name;
b) person in charge of the certification or standardization (,
c) receipt conditions, when applicable;
d) maturity date.

7. TRACEABILITY OF MEASUREMENT AND CALIBRATIONS

7.1 The laboratory shall have an established program for calibration and verification of its equipment, so as to guarantee the use of calibrated and/or verified equipment on the date the tests shall be carried out.

7.2 The reference standards calibration certificates shall be issued by:
a) national metrology laboratories;
b) calibration laboratories accredited by Cgcre/Inmetro;
c) Laboratories from National Metrology Institutes in other countries, in the following cases:
– when traceability is obtained directly from an institution bearing the associated magnitude primary standard, or; – when the institution takes part in interlaboratory comparison programs, together with Cgcre/Inmetro, with compatible results; – laboratories accredited by Accreditation Agencies in other countries, when there is a mutual acknowledgement agreement or a cooperation agreement between Cgcre/Inmetro and such agencies.

7.3 The measurement and test equipment certificates of a laboratory test shall comply with the requirements set forth in the previous item.

7.4 The reference standards kept by the laboratory shall be only used for calibrations, unless one can demonstrate that its performance as a reference standard is not deemed invalid.

8. CALIBRATION AND TEST METHOD

8.1 All instructions, standards and data with reference to the laboratory work shall be documented, kept updated and promptly available to the laboratory staff.

8.2 The laboratory must use documented procedures and appropriate statistical techniques, and sample selection techniques, when carrying out sampling as part of the test.

8.3 The laboratory shall submit the calculations and transfer of data to appropriate verifications.

8.4 The laboratory shall have procedures to protect computer register data.

9. HANDLING OF ITEMS

9.1 The laboratory shall identify univocally the items to be testes, so that no mistakes are made, at any time, as far as its identification is concerned.

9.2 The laboratory shall have documented procedures and appropriate facilities to avoid the deterioration or damage of the tested item during storage, handling and preparation of such item for the test.

10. REGISTRATIONS

10.1 The laboratory shall keep a registration system appropriate to the specific circumstances and shall comply with all applicable regulations, as well as the registration of all the original observations, calculations and data, registers and copy of test reports, for a period of, at least, four years.

10.2 Alterations and/or errors in the registers must be crossed out, and the previous annotation shall not be made illegible or removed, and the new annotation shall be registered next to the previously crossed out one, so that it can be read and no dubious interpretation may arise from it, and it shall bear the signature or initials of the person in charge.

10.3 The test data registration shall contain, at least:
a) laboratory identification;
b) sample identification;
c) equipment identification;
d) relevant environmental conditions;
e) measurement result and its uncertainties, when applicable;
f) date and signature of the person who carried out the work.

10.4 All registers printed, either from a computer or calculator, graphs, and others shall be dated, initialed and attached to the measurement registrations.

10.5 All registers (technical or quality ones) shall be kept by the laboratory as far as safety and confidentiality are concerned.

11. CERTIFICATES AND TEST REPORTS

11.1 The results of each test or series of test carried out by the laboratory shall be reported in a precise, clear and objective fashion, with no ambiguities in a test report and they shall include all the necessary information to interpret the test results, according to what is required by the used method.

11.2 The laboratory shall register all necessary information so that the test can be carried out again and such registers shall be made available to clients.

11.3 Every test report shall include, at least, the following information:
a) title;
b) laboratory name and address;
c) report sole identification;
d) client name and address;
e) description and identification, with no ambiguities, of tested item;
f) characteristics and conditions of tested item;
g) date item was received and date test was carried out;
h) reference to sampling procedures, when applicable;

i) any deviations, additions, or exclusions of test method and any other information with reference to a specific test, such as environment conditions;
j) consequent measurements, verifications and results, supported by tables, graphs, schemes and photos;
k) uncertainty statement estimated by test result (when applicable); signature, title or equivalent identification of person in charge of the report content and issuance date;
l) when applicable, statement that results only refer to tested items;
m) statement that the report can only be reproduced as a whole and with the client's approval;
n) item identification;
o) reference to the used standard specification.

12. SUPPORT SERVICES AND EXTERNAL SUPPLY

12.1 The laboratory shall keep registers with reference to the acquisition of equipment, materials and services, including:
a) purchase specification;
b) receipt inspection;
c) calibration or verification.

ANNEX E

INSTRUCTIONS FOR THE INSTALLATION MANUAL

0 The Installation Manual of the child restraint device must contain at least the following information, complemented by those contained in item 9.2 of ABNT Standard NBR 14400:

1 Instructions in the Portuguese Language.

2 Recommendations and important information:

- "Follow all instructions in this manual for the child to have the best protection possible in case of accident."

- "This equipment was designed to be used only in vehicle seats facing the front."

- "This child restraint device was designed to absorb part of the energy of an impact of the vehicle, so as to reduce the risk of the user in case of a car crash or sudden deceleration of the vehicle, by limiting the dislodgment of the child's body."

- "The unoccupied equipment (not in use) must be maintained attached to the safety belt or stored in the trunk of the vehicle."

- "Never make any changes or additions to the child restraint device in automotive vehicles. The set of components of the retention device was tested and approved to protect the child. Therefore, the person responsible for any changes in the retention device, mischaracterizing the certification conditions, will affect the child's safety."

- "This product is appropriated for children weighting from... kg to ...kg. "

- "Never transport the child without a retention equipment or on an equipment that is not suited to the child's age, weight, and height, as the child will be under higher risk of lesions in case of an accident."

- "As this is a safety item, never buy a used product, particularly for not being possible to measure the efforts to which the product was subject before."

- "Don't use this equipment if it has been used in an accident before."

- "Never let the child on the child restraint device inside automotive vehicles without the appropriate supervision of an adult."

- "One of the main objectives of the safety devices is to avoid to the maximum extent the child's body from moving. Therefore, before you start your vehicle, be sure that the retention device is firmly attached to the vehicle's seat, and that its retention system is correctly buckled up to the child."

- "It is important to emphasize that the use of baby adapter cushions must involve the head, and not support it, so as to prevent injury to the child's neck. Also, the manufacturer must make clear the limit to which (age or height of the baby) this adapter must be used. When no head adapter is present, but the chair seems to be too big for the baby (in case of convertible seats, when the baby is a newborn), it is recommended to use rolled cotton towels to support the body and the head of the baby."

- "Never leave baggage or other objects that could cause injury next to the child."

- “Never leave the child alone in the vehicle.”

- "Keep this instructions manual for future consultations."

3 Must contain instructions on how to clean the child restraint device.

4 Must contain instructions on how to install the child restraint device, containing at least the following:
– illustrations of the product with clear figures for each step of the installation;
– indications of each component of the product;
– minimum orientations for each step of the installation, such as, for instance: indicate the position of the chair according to the child’s weight; demonstrate how to pass the seat belt through the child’s seat according to its position; demonstrate how to attach the seat firmly to the seat belt.

5 Must contain orientations on how to use the child restraint device, such as, for instance:
– mass groups appropriated for use on the child restraint device;
– biometric regulation;
– correct position of the child.

6 In order to facilitate the installation to the user, the Installation Manual must contain objective and illustrative information. The language must not be technical and the handling explanations must be accompanied of illustrations.

ANNEX F

COMMITMENT TERM NO.

By this instrument and in the best terms of the law, the importing company (company's corporate name)**,** headquartered at (address), enrolled with the Brazilian Corporate Taxpayer's Registry under number (CNPJ) xxx, legally represented by (name and Individual Taxpayer's number (CPF) of the legal representative), agrees hereby to be responsible for the failure to commercialize the imported samples of the child restraint device related to the following Import License (s) (LI): (number and date of issue of the LI).

The products are as described below, before the granting of the Authorization for use of the Conformance Identification Seal issued by the OCP (OCP corporate name), issued by the National Institute of Metrology, Normalization, and Industrial Quality – INMETRO, under no. xxx.:

Description of the safety devices:

NCM	BRAND/MODEL	NUMBER OF SAMPLES

The company (corporate name) also commits to inform (OCP's corporate name) about the location of the imported sample(s) and the date in which they are made available for the sampling.

In the event of non-compliance of the child restraint device with regulation NBR 14400, the model shall be reproved and, therefore, deemed inappropriate for consumption in Brazilian territory. In such condition, the company (corporate name) commits to take any appropriate measures:
Implement in the country of origin the applicable corrective actions to solve the causes of rejection of the product and then present a new sampling for tests regarding the reasons of the initial rejection.
In the event of impossibility to perform the corrective action, the company shall proceed tot he destruction of the rejected model(s) in the country of origin, and shall be prevented from importing it without the respective certification.

In the event of failure to comply with the obligations agreed upon in this Commitment Term, the importing company shall be liable to the civil and criminal penalties provided for in the legislation in force, as well as any indemnifications for losses and damages to whom they may so have caused.

(Location and Date).

Certified Entity
Responsible signature
Position

Importing Company
Responsible signature
Position

ANNEX G

EXEMPTION STATEMENT REQUEST FOR THE LIBERATION OF SAMPLES
No.

We hereby inform you that the sample(s) contained in LI(s) no. xxxxxx of (date), included in the Commitment Term no. xxxx, for (corporate name of the importing company), are destined to the performance of tests for later certification, according to Inmetro Ordinance no. xxx of (date).

With nothing further, we remain at your service for any other information..

Location, month, day, year.

Certified Entity
Responsible Signature
Position