

## Non-Deployed OEM Airbags

The re-use of non-deployed OEM airbags is an economical and safe alternative to new OEM airbags when airbags need replacing after an accident when proper care is taken to remove, store, catalogue, ship, and install an airbag.

The Canadian Council of Motor Transport Administrators (CCMTA) has endorsed Guidelines to safely re-use "recycled" OEM airbags. <a href="http://www.ciia.com/newsletters/Guideline-Recycled-20040510-final-1.pdf">http://www.ciia.com/newsletters/Guideline-Recycled-20040510-final-1.pdf</a>

ARC supports the CCMTA Guidelines and is in the process of educating recyclers, insurers and collision repairers regarding the content and implementation of those Guidelines.

Note: the CCMTA refers to "recycled airbags" where ARC prefers to "non-deployed OEM airbags" so as to differentiate between remanufactured, used, or non-OEM airbags.

## The Guidelines include:

- If a recycled airbag or airbag system component is to be installed by a third party, the vehicle owner must be made aware of the intended use of a recycled component prior to its installation.
- There should be no modifications to the airbag components including finish and colour except for those modifications carried out in accordance with a process approved by the original manufacturer of the vehicle.
- The supplier must ensure that any recycled airbag system component supplied is a suitable interchange for the recipient vehicle. Interchange must be ensured through confirmation with published, recognized and approved interchange data (for example ADP Hollander or similar publication).
- Suppliers of recycled airbag system components must use an established protocol for inspection of a recycled airbag system

component, and must perform such inspections on all units prior to sale/installation. Only units that successfully meet all the requirements may be sold/installed. Units that do not meet the inspection protocol must be deployed and rendered unusable. Inspections must include at a minimum the following:

- The recycled airbag supplier must identify, record and report the donor vehicle information including vehicle year, make, model and VIN.
- Airbag module cover must be visually inspected and show no damage including nicks, scrapes, scratches or outer flaws which might lead to the refinishing of the module.
- Airbag system components must be visually inspected and show no signs of water contamination - including mould, mildew or water residue.
- If the donor vehicle has sustained any flood damage, a recognized and approved water contamination test must be completed on the recycled airbag module by an industry approved laboratory and the results documented. The test results must prove no signs of water contamination.
- Airbag module must be inspected and be free of loose parts or foreign objects.
- Reaction plate and propellant canister must be visually inspected and be free of defects including deformation, corrosion or damaged fasteners.
- Wiring and electrical connectors must be visually inspected and show no corroded, damaged or abraded wires, terminals or connectors.
- The shorting bar, if included, must be visually checked for correct operation.
- Suppliers of recycled airbag system components must have at least one person on staff who has completed a recognized course, approved by the jurisdiction, on recycled airbag and airbag system components.
- Persons involved in shipping and transporting of airbag system components (both recycled and new) are required to have the appropriate training under Part 6 of the TDG Regulations.
- Jurisdictions may wish to develop an audit and compliance system to ensure suppliers are following the required standards
- Upon sale, each recycled airbag system component must be accompanied by a supplier issued document including the following information:
  - o Identification of the supplier of the unit.
  - Identification of the airbag module cover colour (and colour code if available).

- Identification of the donor vehicle, including VIN, year, make and model.
- Suppliers internal stock number or locator number for follow-up.
- Indication of source of interchange information (i.e.
  Interchange manual / part number, OEM information, etc).
- A supplier certificate indicating all the requirements of the inspection protocol have been successfully achieved and the identification of the person who completed the inspection.
- A document containing the vehicle description including the year, make and model for which the airbag system component is required when being sold to the end-user.
- Once removed from the donor vehicle, airbag modules should be stored in a cool dry location with appropriate fire protection, stored cover side up and not stacked.
- Suppliers of airbag system components must also be compliant with the Workplace Hazardous Materials Information System (WHMIS) requirements.
- There is currently no evidence that recycled parts pose a safety concern; and at this time the information does not support the development of a specific process to deal with recalls. When tested, undamaged OEM recycled airbag modules performed similarly to new replacement OEM airbag modules.

These Guidelines do not include rebuilt, re-manufactured, or nonoriginal equipment airbag or airbag system components. They do not include any airbag or airbag system component that has been disassembled, altered, repaired or had any parts removed or replaced.

The CCMTA wants to highlight the fact that acceptance of these Guidelines do not mean any jurisdiction is required to adopt the use of recycled airbags. The report provides the information should consideration be given to the adoption of such a program. The Guidelines also provide for consistency, where the use of recycled airbags is accepted.