

Standards Australia Limited  
GPO Box 476  
Sydney NSW 2001

## **RE: Seatbelt assemblies for motor vehicles – AS 2596**

### **About the College**

The Australasian College of Road Safety is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the College is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy. Our objectives include the promotion of road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety.

### **Our response to the consultation**

The ACRS welcomes the opportunity to comment on the proposed draft standard in relation to seat belt assemblies in motor vehicles. Seat belts undoubtedly save lives, but are also associated with spinal, abdominal and pelvic injuries, which may be reduced when seatbelts are applied correctly.<sup>1</sup>

### **BACKGROUND:**

#### SECTION 2: Definitions

1. The definition is clear, a Safety Belt (Seat-belt, belt) – is an arrangement of **straps with a securing buckle**, adjusting devices and attachments.....
2. We have a generalised understanding that a seat belt is just the webbing part and disregard the 'securing buckle'

### **MODIFICATION TO DRAFT STANDARD:**

#### Appendix ZA

##### ZA.1 Instructions for installation

- ADD: With reference to the Definition of a Safety Belt, Installation must include **both the seat belt and securing buckle** as supplied in a Certified Kit. Mixing parts from different manufacturers could be dangerous.

##### ZA.2.2 Warning

- ADD: The safety belt (seat belt) and securing buckle **MUST** be fitted as a pair.

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<sup>1</sup> Abbas AK, Hefny AF, Abu-Zidan FM. Seatbelts and road traffic collision injuries. World Journal of Emergency Surgery. 2011;6(1):18.

**SUPPORTING INFORMATION:**

The Standard specifies a Testing and Certification process to prove the effectiveness of the restraint system in an impact crash situation. This testing process requires a safety belt and securing buckle fitted together on the test rig. These parts generate the Certification once all the items pass the testing. In order for this proven product to be effective it **MUST** be fitted as a complete kit. Packaging requires both parts to be supplied, its only logical that they be fitted together.

The use of an existing component, because it does not 'look' damaged is dangerous.

As manufacturers have differing manufacturing processes and components, products from different manufacturers **MUST NOT** be mixed. Mixing parts will void the Certification for the 'kit'.

Please do not hesitate to contact me should you require any further information.

Yours sincerely,



Dr Ingrid Johnston  
CEO  
Australasian College of Road Safety

10 March 2022