#### OMB Control No.: 2127-0004

# Part 573 Safety Recall Report

## 22C-001

**Manufacturer Name:** Columbus Trading-Partners USA, Inc.

Submission Date: APR 20, 2022 NHTSA Recall No.: 22C-001 Manufacturer Recall No.: NR



### **Manufacturer Information:**

Manufacturer Name: Columbus Trading-Partners USA, Inc.

Address: 225 Byers Road

Miamisburg OH 45342

Company phone: 937-415-3215

## **Population:**

Number of potentially involved: 20,526 Estimated percentage with defect: 100 %

## **Child Restraint Information:**

Make 1: Sirona

Model: M

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Seat Type: OTHER

Model No.: 518000385

Platform Name / No.: NR

**Brand Name: CYBEX** 

Descriptive Information: The US version of the CYBEX Sirona M is a convertible child restraint system that

is used both rear-facing and forward-facing that is distributed by Columbus Trading-Partners (CTP). The structure of the US Sirona M is primarily steel and rigid plastic. However, foam is used in child-contactable areas, including the headrest, for safety and comfort purposes. The foam used is expanded

headrest, for safety and comfort purposes. The foam used is expanded polystyrene (EPS) with a composition small beads (3-4 mm) bonded together to form a rigid structure. A small number of consumers have notified CTP and NHTSA that their child has accessed and picked small pieces of the foam. Based on these reports, CTP initially implemented an engineering change on August 31, 2018 to add tape to the lower edges of the EPS to prevent access to the foam. CTP received additional notifications from consumers regarding foam picking on seats manufactured prior to the engineering change, so CTP intends to publish a voluntary recall notice to advise consumers that their child may be able to access the foam in seats manufactured on or before to August 31, 2018, and to provide a manufacturer-approved tape kit to apply to the headrest EPS to prevent picking the foam. The US Sirona M remains in all other ways a safe and FMVSS 213 compliant child restraint. CYBEX has determined that non-US versions of the

CYBEX Sirona M are not affected.

The total number of US Sirona M 518000385 affected is 347.

Production Dates: AUG 31, 2018 - AUG 31, 2018

Make 2: Sirona

Model: M Seat Type: NR

Model No.: 518000387

Platform Name / No.: NR

**Brand Name: CYBEX** 

Descriptive Information: The US version of the CYBEX Sirona M is a convertible child restraint system that

is used both rear-facing and forward-facing that is distributed by Columbus Trading-Partners (CTP). The structure of the US Sirona M is primarily steel and rigid plastic. However, foam is used in child-contactable areas, including the headrest, for safety and comfort purposes. The foam used is expanded

polystyrene (EPS) with a composition small beads (3-4 mm) bonded together to form a rigid structure. A small number of consumers have notified CTP and NHTSA that their child has accessed and picked small pieces of the foam. Based on these reports, CTP initially implemented an engineering change on August 31, 2018 to add tape to the lower edges of the EPS to prevent access to the foam. CTP received additional notifications from consumers regarding foam picking on seats manufactured prior to the engineering change, so CTP intends to publish a voluntary recall notice to advise consumers that their child may be able to access the foam in seats manufactured on or before August 31, 2018, and to provide a manufacturer-approved tape kit to apply to the headrest EPS to prevent picking the foam. The US Sirona M remains in all other ways a safe and FMVSS 213 compliant child restraint. CYBEX has determined that non-US versions of the

CYBEX Sirona M are not affected.

The total number of US Sirona M 518000387 affected is 1066.

Production Dates: NOV 04, 2017 - NOV 21, 2017

Make 3: Sirona

Model: M Seat Type: NR

Model No.: 518002145

Platform Name / No.: NR

**Brand Name: CYBEX** 

Descriptive Information: The US version of the CYBEX Sirona M is a convertible child restraint system that

is used both rear-facing and forward-facing that is distributed by Columbus Trading-Partners (CTP). The structure of the US Sirona M is primarily steel and rigid plastic. However, foam is used in child-contactable areas, including the headrest, for safety and comfort purposes. The foam used is expanded

polystyrene (EPS) with a composition small beads (3-4 mm) bonded together to form a rigid structure. A small number of consumers have notified CTP and NHTSA that their child has accessed and picked small pieces of the foam. Based on these reports, CTP initially implemented an engineering change on August 31, 2018 to add tape to the lower edges of the EPS to prevent access to the foam. CTP received additional notifications from consumers regarding foam picking on seats manufactured prior to the engineering change, so CTP intends to publish a voluntary recall notice to advise consumers that their child may be able to access the foam in seats manufactured on or before August 31, 2018, and to provide a manufacturer-approved tape kit to apply to the headrest EPS to prevent picking the foam. The US Sirona M remains in all other ways a safe and FMVSS 213 compliant child restraint. CYBEX has determined that non-US versions of the

CYBEX Sirona M are not affected.

The total number of US Sirona M 518002145 affected is 5569.

Production Dates: NOV 03, 2017 - AUG 18, 2018

Make 4: Sirona Model: M

Seat Type: NR

Model No.: 518002149

Platform Name / No.: NR

**Brand Name: CYBEX** 

Descriptive Information: The US version of the CYBEX Sirona M is a convertible child restraint system that

is used both rear-facing and forward-facing that is distributed by Columbus Trading-Partners (CTP). The structure of the US Sirona M is primarily steel and rigid plastic. However, foam is used in child-contactable areas, including the headrest, for safety and comfort purposes. The foam used is expanded

polystyrene (EPS) with a composition small beads (3-4 mm) bonded together to form a rigid structure. A small number of consumers have notified CTP and NHTSA that their child has accessed and picked small pieces of the foam. Based on these reports, CTP initially implemented an engineering change on August 31, 2018 to add tape to the lower edges of the EPS to prevent access to the foam. CTP received additional notifications from consumers regarding foam picking on seats manufactured prior to the engineering change, so CTP intends to publish a voluntary recall notice to advise consumers that their child may be able to access the foam in seats manufactured on or before August 31, 2018, and to provide a manufacturer-approved tape kit to apply to the headrest EPS to prevent picking the foam. The US Sirona M remains in all other ways a safe and FMVSS 213 compliant child restraint. CYBEX has determined that non-US versions of the

CYBEX Sirona M are not affected.

The total number of US Sirona M 518002149 affected is 1657.

Production Dates: NOV 06, 2017 - MAY 25, 2018

Make 5 : Sirona Model : M

Seat Type: NR

Model No.: 518002151

Platform Name / No.: NR

**Brand Name: CYBEX** 

Descriptive Information: The US version of the CYBEX Sirona M is a convertible child restraint system that

is used both rear-facing and forward-facing that is distributed by Columbus Trading-Partners (CTP). The structure of the US Sirona M is primarily steel and rigid plastic. However, foam is used in child-contactable areas, including the headrest, for safety and comfort purposes. The foam used is expanded

polystyrene (EPS) with a composition small beads (3-4 mm) bonded together to form a rigid structure. A small number of consumers have notified CTP and NHTSA that their child has accessed and picked small pieces of the foam. Based on these reports, CTP initially implemented an engineering change on August 31, 2018 to add tape to the lower edges of the EPS to prevent access to the foam. CTP received additional notifications from consumers regarding foam picking on seats manufactured prior to the engineering change, so CTP intends to publish a voluntary recall notice to advise consumers that their child may be able to access the foam in seats manufactured on or August 31, 2018, and to provide a

manufacturer-approved tape kit to apply to the headrest EPS to prevent picking the foam. The US Sirona M remains in all other ways a safe and FMVSS 213 compliant child restraint. CYBEX has determined that non-US versions of the

CYBEX Sirona M are not affected.

The total number of US Sirona M 518002151 affected is 5158.

Production Dates: NOV 06, 2017 - AUG 18, 2018

Make 6: Sirona

Model: M Seat Type: NR

Model No.: 518002153

Platform Name / No.: NR

**Brand Name: CYBEX** 

Descriptive Information: The US version of the CYBEX Sirona M is a convertible child restraint system that

is used both rear-facing and forward-facing that is distributed by Columbus Trading-Partners (CTP). The structure of the US Sirona M is primarily steel and rigid plastic. However, foam is used in child-contactable areas, including the headrest, for safety and comfort purposes. The foam used is expanded

polystyrene (EPS) with a composition small beads (3-4 mm) bonded together to form a rigid structure. A small number of consumers have notified CTP and NHTSA that their child has accessed and picked small pieces of the foam. Based on these reports, CTP initially implemented an engineering change on August 31, 2018 to add tape to the lower edges of the EPS to prevent access to the foam. CTP received additional notifications from consumers regarding foam picking on seats manufactured prior to the engineering change, so CTP intends to publish a voluntary recall notice to advise consumers that their child may be able to access the foam in seats manufactured on or before August 31, 2018, and to provide a manufacturer-approved tape kit to apply to the headrest EPS to prevent picking the foam. The US Sirona M remains in all other ways a safe and FMVSS 213 compliant child restraint. CYBEX has determined that non-US versions of the

CYBEX Sirona M are not affected.

The total number of US Sirona M 518002153 affected is 6629

Production Dates: JAN 06, 2018 - AUG 22, 2018

Make 7: Sirona

Model: M

Seat Type: OTHER

Model No.: 519000211

Platform Name / No.: NR

**Brand Name: CYBEX** 

Descriptive Information: The US version of the CYBEX Sirona M is a convertible child restraint system that

is used both rear-facing and forward-facing that is distributed by Columbus Trading-Partners (CTP). The structure of the US Sirona M is primarily steel and rigid plastic. However, foam is used in child-contactable areas, including the headrest, for safety and comfort purposes. The foam used is expanded

polystyrene (EPS) with a composition small beads (3-4 mm) bonded together to form a rigid structure. A small number of consumers have notified CTP and NHTSA that their child has accessed and picked small pieces of the foam. Based on these reports, CTP initially implemented an engineering change on August 31, 2018 to add tape to the lower edges of the EPS to prevent access to the foam. CTP received additional notifications from consumers regarding foam picking on seats manufactured prior to the engineering change, so CTP intends to publish a voluntary recall notice to advise consumers that their child may be able to access the foam in seats manufactured on or before August 31, 2018, and to provide a manufacturer-approved tape kit to apply to the headrest EPS to prevent picking the foam. The US Sirona M remains in all other ways a safe and FMVSS 213

CYBEX Sirona M are not affected.

The total number of US Sirona M model number 518000211 affected is 100.

compliant child restraint. CYBEX has determined that non-US versions of the

Production Dates: MAY 07, 2018 - MAY 07, 2018

## **Description of Defect:**

Description of the Defect: A small number of consumers notified CTP and NHTSA that is possible for a child to access and pick small pieces of foam under the headrest pad on the US version of the Cybex Sirona M convertible seat. It has been reported that a child can put the small piece of foam into their mouth. These reports have not included any claims of injury or choking. Moreover, the foam picking does not impact the crashworthiness of the seat and the seat is in all other ways compliant with FMVSS 213.

> However, CTP has determined that a child can access the foam through a small opening in the headrest fabric that covers the foam headrest. It has been reported that a child can pick small pieces of foam which could pose a choking hazard. Pictures of the car seats showing the headrest fabric and headrest foam are included in the CTP response letters to NHTSA dated 7.22.20, 9.20.21 and 12.8.21 in connection with NHTSA inquiry NEF 0102SW/ PE-21-014. The foam pieces that were picked are small (roughly 3-4 mm), generally spherical pieces, with no sharp edges. The foam is non-toxic and does not pose a chemical or poison concern if ingested. However, if a child places a piece of foam in their mouth the foam could pose a choking hazard.

FMVSS 1: NR FMVSS 2: NR

Description of the Safety Risk: There is a risk that a child may place the foam in their nose, ear, or mouth. The foam pieces that were picked are small (roughly 3-4 mm), generally spherical pieces, with no sharp edges. The foam is non-toxic and does not pose a chemical or poison concern if ingested. However, it a child places a piece of foam in their mouth it could pose a choking hazard. The foam picking does not impact the seat's crashworthiness.

Description of the Cause: Children accessing and picking the EPS foam under the headrest cover while

seated in the car seat.

Identification of Any Warning A consumer may see the child reaching behind their head while accessing the that can Occur: foam, see a small piece of foam on the seat pad of the child restraint, or see the child with a small piece of foam in their mouth, ear, or nose.

## **Involved Components:**

Component Name: NR

Component Description: NR

Component Part Number: NR

## **Supplier Identification:**

## **Component Manufacturer**

Name: NR

Address: NR

NR

Country: NR

## **Chronology:**

CTP closely tracked feedback from consumer owners of the US version of the CYBEX Sirona M following the release of the car seat in the U.S. market. Early in 2018, CTP received a few reports that children could access the foam under the seat pad in the headrest area and could and/or did place the small foam pieces in their mouths.

To address consumer feedback and to continuously improve our products for our consumers, CTP implemented an engineering change on August 31, 2018, which consisted of adding tape to the lower edges of the EPS in the child restraint's headrest. This eliminated the ability of a child from being able to pick or scrape the EPS.

NHTSA submitted a request for information to CTP on July 16, 2020 related to two reports of foam picking on the car seat. CTP responded to NHTSA providing information regarding the engineering change. CTP remained in communication with NHTSA regarding the foam picking, providing NHTSA additional requested information on September 20, 2021 and December 8, 2021.

While CTP received some reports of children that could or possibly did place foam pieces in their mouths, CTP did not receive any reports of any injuries or fatalities. The pieces of foam are small, soft, and non-toxic. However, if a child picks a piece of foam and places it into their mouth, nose, or ear the foam could pose a choking hazard or otherwise cause a safety concern for caregivers.

Following additional discussions with NHTSA and in furtherance of continuous product improvement and a robust commitment to safety, CTP determined it should prepare and provide a product improvement kit to consumers through a Voluntary Safety Recall Campaign which will enable consumers who own certain US Sirona M models manufactured on or before August 31, 2018 to apply tape to the EPS foam to prevent foam picking.

## **Description of Remedy:**

Description of Remedy Program: CTP plans to send a product improvement kit to owners of the impacted seats consisting of manufacturer-approved tape and instructions to apply the tape to the EPS headrest foam. The tape will eliminate access to the foam by the occupant. CTP plans to complete the following activities: 1. CTP will mail a notification letter to all registered consumers of the impacted US Sirona M car seats informing them about the potential foam picking issue and enclosing manufacturer-approved tape and instructions for properly applying the tape to prevent access to the headrest foam. 2. CTP will issue a press release on its website and will issue communications on its social media accounts with information about the safety recall campaign and available product improvement kit. Owners will be instructed how to find the model number and date of manufacture on their seat(s). CTP will provide owners of US Sirona M seats manufactured on or before August 31, 2018 who contact CTP with a product improvement kit including manufacturer-approved tape to cover the EPS foam and instructions for proper application to prevent access to the foam. CTP will also advise consumers that all US Sirona M seats manufactured after August 31, 2018 come with the additional tape already applied preventing access to the EPS headrest foam and are not the subject of the recall campaign.

3. CTP will put a video on its website demonstrating proper application of the manufacturer-approved tape to the EPS headrest foam. All notification letters sent to consumers will include a QR code to link them to this video as well as a website address where the video is located.

How Remedy Component Differs The manufacturer-approved tape will be accompanied by clear written from Recalled Component: instructions, a QR code linking the consumer to a video demonstrating the proper application of the tape, and a website address where the video instructions can also be found. These instructions will assist the consumer in clearly distinguishing the tape from any existing feature or component of the US Sirona M.

Identify How/When Recall Condition As noted above, based on consumer feedback and as a commitment to was Corrected in Production: continuous product improvement, CTP implemented an engineering change on August 31, 2018, which consisted of adding tape to the headrest EPS foam on the US Sirona M to prevent access to the foam.

#### **Recall Schedule:**

Description of Recall Schedule: NR

Planned Dealer Notification Date: MAY 09, 2022 - MAY 23, 2022 Planned Owner Notification Date: MAY 09, 2022 - MAY 23, 2022

## **Purchaser Information:**

The following manufacturers purchased this defective/noncompliant equipment for possible use or installation in new motor vehicles or new items of motor vehicle equipment:

Name: NR

Address: NR

NR

Country: NR

Company Phone: NR

\* NR - Not Reported