



December 21, 2016

The Honourable Marc Garneau  
Minister  
Transport Canada

VIA EMAIL DELIVERY

Dear Minister Garneau

A new report by the Auditor General included information about child safety, specifically a possible change to the recommendations for installation of child restraint systems. The Juvenile Products Manufacturers Association (JPMA) has concerns that this information may be confusing not only to manufacturers and regulatory requirements, but also to consumers about installation best practices and child passenger safety. We welcome an open dialogue with Transport Canada and the appropriate staff to discuss this information and the position of our member manufacturers.

JPMA is a national not-for-profit trade association representing 95% of the prenatal industry including the producers, importers, and distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. JPMA does so through advocacy, public relations, information sharing, product performance certification and assistance conducted with appreciation for the needs of parents, children, caregivers and retailers. JPMA continues to work with government officials, consumer groups, and industry leaders on pro-grams to education consumers on the safe selection and use of juvenile products. As part of our membership, we represent the majority of child restraint system manufacturers operating in North America.

Information in the report as well as the recent consumer information notice issued by Transport Canada suggests the UAS system and the vehicle seat belt should be used together when installing a child restraint system. However, this is contrary to the best practices and installation guidance of all of our member manufacturers who allow for either safety system to be utilized for rear facing or forward facing modes of use. As you are aware, child restraint systems are highly regulated and those sold in North America must meet testing protocols using each installation option independently. In fact, manufacturers are not required nor do they test combing the installation methods and therefore cannot support the recommendation to use them together.

JPMA would like to be an active partner with Transport Canada on this and other child restraint system issues. We believe we can assist in providing the industry perspective as well as gathering pertinent data from manufacturers that will advance best practices and safety. Should you have any question or would like engage with us in a discussion please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Vallese", is centered on the page. The signature is written in a cursive, flowing style.

Julie Vallese  
Managing Director  
Juvenile Products Manufacturers Association

Cc:

Michael Keenan  
Kim Benjamin