OMB Control No.: 2127-0004

# Part 573 Safety Recall Report

## 22C-002

Manufacturer Name: Clek, Inc. **Submission Date:** JUL 15, 2022 NHTSA Recall No.: 22C-002 Manufacturer Recall No.: NA



#### **Manufacturer Information:**

Manufacturer Name: Clek, Inc.

Address: 226 Lesmill Rd

TORONTO, ONTARIO, CANADA 00

M3B 2T5

Company phone: 1-866-656-2462

## **Population:**

Number of potentially involved: 11,123 Estimated percentage with defect: 100 %

#### **Child Restraint Information:**

Make 1: Clek Model: Ozzi

Seat Type: BOOSTER SEAT

Model No.: OZ11U2

Platform Name / No.: NR

Brand Name: NR

Descriptive Information: All Olli booster car seats manufactured from January 20, 2020 through May 10,

2022 (9,100 products) and all Ozzi booster car seats manufactured from March 1, 2020 through May 10, 2022 (2,023 products) are affected. The subject booster car seats do not conform to the requirements of §571.213, S5.5.2(I)(1). The population of the affected booster car seats was determined by a review of

booster car seat production records.

Production Dates: MAR 01, 2020 - MAY 10, 2022

Make 2: Clek

Model: Olli

Seat Type: BOOSTER SEAT

Model No.: OL12U2

Platform Name / No.: NR

Brand Name: NR

Descriptive Information: All Olli booster car seats manufactured from January 20, 2020 through May 10,

2022 (9,100 products) and all Ozzi booster car seats (2,023 products) manufactured from March 1, 2020 through May 10, 2022 are affected. The subject booster car seats do not conform to the requirements of §571.213, S5.5.2

(I)(1). The population of the affected booster car seats was determined by a

review of booster car seat production records.

Production Dates: JAN 20, 2020 - MAY 10, 2022

## **Description of Noncompliance:**

Description of the Noncompliance: Federal Motor Vehicle Safety Standard 213, Section S5.5.2(I) (1) requires an installation diagram showing the child restraint system installed in a seating

position equipped with a continuous-loop lap/shoulder belt. The affected booster car seats are missing an illustration diagram showing the child restraint system installed in a seating position equipped with a continuous-loop lap/shoulder belt. As a result, the subject seats do not conform to the

requirements of  $\S571.213$ ,  $\S5.5.2(I)(1)$ .

FMVSS 1: 213 - Child restraint systems

FMVSS 2: NR

Description of the Safety Risk: The safety risk is low as all other labels are present, including a label showing

NOT to install with a lap-only belt, the phrase "belt here" is molded into the

seat to inform a caregiver of the correct installation and information

pertaining to the correct installation, including the lap/shoulder belt routing over the occupant that is shown in the missing illustration, is provided in the instruction manual. In addition, the lap/shoulder belt routing is consistent with the lap/shoulder belt routing for the adult caregiver. However, if the booster car seat is not properly installed with the lap/shoulder belt, the child may not be properly secured by the vehicle belt, increasing the risk of injury

in a crash.

Description of the Cause: The label where the required illustration was located had inadvertently been

removed from the side of the seat cushion following a change in the sewing

supplier.

Identification of Any Warning A caregiver will be able to visually see if the lap/shoulder belt is not properly

that can Occur: installed over the child.

#### **Involved Components:**

Component Name: US Side Warning Label

Component Description: label on side of product containing proper vehicle belt routing illustration

Component Part Number: A01-0035-US-B1

### **Supplier Identification:**

## **Component Manufacturer**

Name: NR Address: NR NR Country: NR

## **Chronology:**

On May 18, 2022, Clek received a letter from NHTSA ODI dated 5/18/22 advising of a potential noncompliance on the Olli booster car seat during testing of the car seat as part of the FY2021 compliance test program.

On May 19, 2022, Clek opened an internal investigation into the reported potential noncompliance. As the Olli booster car seat is very similar to the Ozzi booster car seat, Clek also reviewed the Ozzi car seat for the potential noncompliance.

On May 31, 2022, Clek confirmed that certain production of the Olli and Ozzi booster car seats do not include a required installation diagram and determined that the affected booster seats do not conform to Section S5.5.2 (l)(1) of FMVSS 213.

Initial 573 submitted on June 7th with the intention to petition pursuant to 49 CFR 556.

On June 16, NHTSA recommends that Clek conduct a noncompliance recall in lieu of submitting its petition for inconsequential compliance due to the fact that the required label was missing. Clek takes NHTSA's recommendation under consideration.

On June 30, Clek decided to conduct the recall.

### **Description of Remedy:**

Description of Remedy Program: Clek will send a notification to all registered owners informing them about

the issue. This letter will include a label with the missing diagram and

instructions on how to apply it to the booster seat.

Clek will also make a press release on their website with information of

the non-compliance.

How Remedy Component Differs The remedy component is a new label that includes the missing

from Recalled Component: installation diagram and a letter requesting consumers to place the label onto the booster seat. As the recall is for a missing illustration the new

label includes an additional illustration that will be added to the product to

bring the booster seats into compliance with FMVSS 213.

Identify How/When Recall Condition The missing installation diagram was added to all production

was Corrected in Production: manufactured after May 10, 2022.

#### **Recall Schedule:**

Description of Recall Schedule: Website notices will be posted simultaneously with the NHTSA recall

notice and the mailing campaign of owner notifications/remedies planned to begin around August 1st and will take approximately two

weeks to complete.

Planned Dealer Notification Date : JUL 25, 2022 - SEP 16, 2022 Planned Owner Notification Date : JUL 25, 2022 - SEP 02, 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

<sup>\*</sup> NR - Not Reported