

PROPOSAL FOR A NEW REGULATION OF CHILD RESTRAINT SYSTEMS IN VEHICLES OF CATEGORIES M2-M3

Submitted by the experts from Spain

A. JUSTIFICATION

The installation and use of seat belts in vehicles of categories M2 and M3 is mandatory in Europe since October 2006 (Directive 2003/20).

Minors must use these seat belts provided that the belts are properly adapted to their age and weight. Therefore, adult seat belts are not appropriate to restrain minors with a lower height than 135 cm and a lower weight than 36 Kg.

In practice, the use of safety belts is not required.

Up until now, the only means of homologating child restraint systems is through 44.04 ECE Regulation, a regulation clearly aimed to the homologation of devices for M1 vehicles.

In addition, on December 2007, GRSP created an informal working group for the development of the new Regulation on homologation of child restraint systems. In the first meeting of the group ad-hoc it was concluded that the new regulation would only include vehicles of category M1.

Consequently, child restraint systems for M2 and M3 vehicles will lose their sole chance to be homologated.

In short, child restraint systems that are installed today on M2-M3 vehicles could not be homologated in the medium term, according to the new regulation. Moreover, these systems that are currently being homologated for these categories of vehicles must fulfil some requirements that do not suit the special configuration of this type of vehicles (2 seat belt anchorage points, limited distance between two consecutive seats, etc) nor the characteristics of accidents in which these vehicles are involved (frontal collision, rear impact in the seat, seat belt integrated, etc...).

B. PROPOSAL

We think the development of a regulation aimed to guarantee the appropriate restraint for minors in vehicles of categories M2 and M3 is necessary. For this reason, we propose the GRSP to study the possibility of creating a new informal working group to develop a new regulation on child restraint systems for M2 and M3 vehicles.