

## Comments/proposals for new Regulation on CRS from Sweden

3.2.1. Refers to 6.1.3. and 6.1.4. (toxicity and flammability), shall refer to 6.3.0.1. and 6.3.0.2.

6.3.0.1. Reference to EN 71-3:1994 Safety of toys – Part 3: Migration of certain elements (next generation probably ready by 2013), instead of EN 71.2009 Part 3

6.3.0.2. Reference to ....relevant clauses of EN 71-2:2006 Safety of toys – Part 2: Flammability, instead of EN 71.2009 Part 2.

Footnote: The relevant European standards can be obtained from the CEN national member bodies, <http://www.cen.eu/cen/members>

5.4.2.3. Symbol Y, is this a relevant/necessary information?

7.1.3.5.3.1. (a), the word exact should be avoided (the only thing that we can be sure about, is that the old reference meter in Paris is not exactly one meter).

7.1.3.6. Table 6 should be harmonized with the table for Geometrical dimensions in Annex 19. Every stature figures in 7.1.3.6. Table 6 (60, 60-75, 75-87, 87-105, 105-125) can be found in the table for Geometrical dimensions in Annex 19, except for stature 87 cm.

Proposal: Insert relevant figures for the stature of 87 cm in Annex 19.

Annex 19 proposal for change of one line in the text under the table:

Minimum Sitting height: Stature 87 cm and taller, B-10%.

Justification: Since 1981 ECE R44 has stated “minimum sitting height” of 500 mm for CRS. ... ..group I, group II.....internal height....500 mm (ECE R44 6.2.7 and Annex 12). Similar interpretation for sitting height has existed since 1975 according to the Swedish T-standard.

Today existing rearward facing CRS, for group I and II, on the Swedish market:

Sitting height group I: 510 – 600 mm

Sitting height group I and II: 510 – 600 mm.

With this stipulated sitting height (since many years), with former and existing CRS, there has not been any fatal or serious injured children on Swedish roads caused of “sticking a part of the child head over the backrest of the CRS” in group I or II.