Proposal for supplement 14 to the 04 series of amendments to UN Regulation No. 44 (Child Restraint Systems)

Submitted by the expert from the European Association of Automotive Suppliers*

The text reproduced below was prepared by the expert from the European Association of Automotive Suppliers (CLEPA). The proposal responds to the document ECE-TRANS-WP.29-GRSP-2017-20e with alternative phase out dates. The modifications to the existing text of the UN Regulation are marked in bold for new or strikethrough for deleted characters.

I. Proposal

Paragraph 6.1.3., amend to read:

"6.1.3. According to the category which it belongs to, the child restraint shall be secured to the vehicle structure or to the seat structure.

Possible configurations for approval Groups / categories table

			Universal (1)		Semi-universal (2)		Restricted		Specific vehicle	
Group category		CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS	
0	Carry-cot	A	NA	A	A(3)	A	NA	A	A(3)	
	Rearward facing	A	NA	A	A (3)	A	NA	A	A(3)	
0+	Rearward facing	A	NA	A	A(3)	A	NA	A	A(3)	
I	Rearward facing	A	NA	A	A(3)	A	NA	A	A(3)	
	Forward facing (integral)	A	A (3)	A	A(3)	A	NA	A	A(3)	
	Forward facing (non-integral)	NA	NA	NA	NA	NA	NA	NA	NA	
	Forward facing (non-integral – see paragraph 6.1.12.)	A	NA	A	NA	A	NA	A	A(3)	

In accordance with the programme of work of the Inland Transport Committee for 2016–2017 (ECE/TRANS/254, para. 159 and ECE/TRANS/2016/28/Add.1, cluster 3.1), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

Group category		Universal (1)		Semi-universal (2)		Restricted		Specific vehicle	
		CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS
II	Rearward facing	A	NA	A	NA	A	NA	A	A
	Forward facing (integral)	A	NA	A	NA	A	NA	A	A
	Forward facing (non integral)	A(4)	NA	A(4)	NA	A(4)	NA	A(4)	A(4)
Ш	Rearward facing	A	NA	A	NA	A	NA	A	A
	Forward facing (integral)	A	NA	A	NA	A	NA	A	A
	Forward facing (non integral)	A	NA	A	NA	A	NA	A	A

With:

CRS: Child restraint system A: Applicable

NA: Not Applicable

- (2) ISOFIX semi universal CRS means:
- Forward facing restraints equipped with support leg or
- Rearward facing restraints equipped with a support leg or a top tether strap for use in vehicles with positions
 equipped with ISOFIX anchorages system and a top tether anchorage if needed
- Or rearward facing restraints, supported by the vehicle dashboard, for use in the front passenger seat
 equipped with ISOFIX anchorages system,
- Or lateral facing position restraint equipped if needed with an anti-rotation device for use in vehicles with positions equipped with ISOFIX anchorages system and top tether anchorage if needed.
- New approvals and extensions will be granted in accordance with paragraphs 17.16 and 17.17.
- (4) New approvals and extensions will be granted in accordance with paragraphs 17.18 and 17.19.

Insert new paragraphs 17.18. and 17.19., to read:

- "17.18. As from [1 September 2021], no new approvals shall be granted under this Regulation to non-integral class forward facing child restraint systems of group 2 or group 2/3, unless they form part of a multi-group child restraint system that will also be approved for group 1 and above.
- 17.19. As from [1 September 2024], no extensions shall be granted under this Regulation to non-integral class forward facing child restraint systems of group 2 or group 2/3, unless they form part of a multi-group child restraint system that will also be approved for group 1 and above.

II. Justification

The dates for phasing out the child restraint systems of Group 2 and Group 2/3 as mentioned in ECE-TRANS-WP.29-GRSP-2017-20 are too early, i.e. 9 months for new approvals and 3 years for end of extensions.

⁽¹⁾ ISOFIX universal CRS means forward facing restraints for use in vehicles with positions equipped with ISOFIX anchorages system and a top tether anchorage.

The developments of new products belonging to the targeted range are already under progress, but the phase out dates proposed in ECE-TRANS-WP.29-GRSP-2017-20 will make those products obsolete immediately after their approval.

GRSP in its 59th session agreed to phase out ISOFIX integral child restraint systems from R44 with a time line of 4 years for new approvals with respect to the EIF of R129 Phase 1, respectively 7 years for extensions (GRSP-59-15-Rev.1)

CLEPA is asking to apply the same timeline scheme for restraint systems of Group 2 and Group 2/3.

In addition, countries like China or Brazil who aligned their CRS standards with this regulation will need some time to adapt their own standards, if they wish to do so.