

Submitted by the expert from CLEPA

Informal document GRSP-62-18
(62nd GRSP, 12-15 December 2017
agenda item 12)



C L E P A
*European Association of
Automotive Suppliers*

Response to ANEC proposal for Booster phase out in R44

ANEC proposal for phase out of G2 & G2/3 from R44



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 (<u>non integral</u>)	A(4)	NA	A(4)	NA	A(4)	NA	A(4)	A(4)

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.

⁽³⁾ 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:

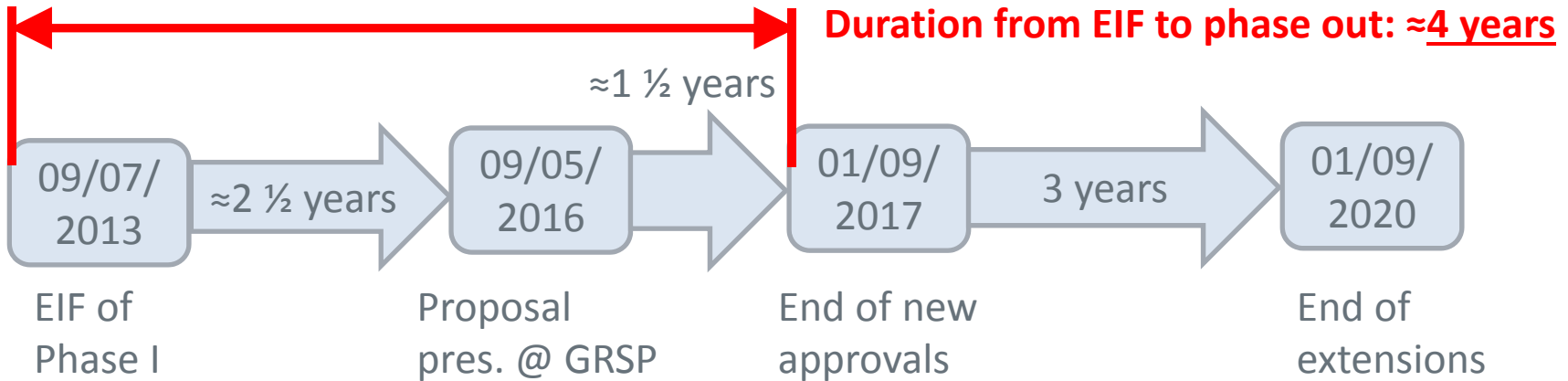
"17.18. As from [1 September 2018], no new approvals shall be granted under this Regulation to non-integral class forward facing child restraint systems of group 2 or group 2/3.

17.19. As from [1 September 2021], no extensions shall be granted under this Regulation to non-integral class forward facing child restraint systems of group 2 or group 2/3."

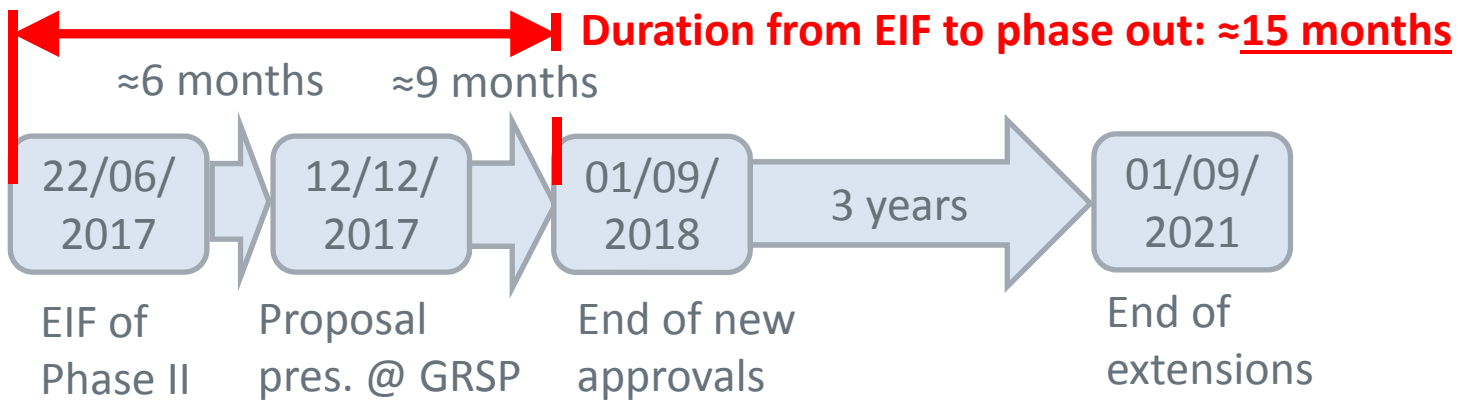
Comparison w timeline of previous phase out



Implemented timeline for phase out of G0/0+/1 w ISOFIX:



Proposed timeline for phase out of G2 & G2/3 from ANEC:



Other reasons why CLEPA thinks the proposed date is to early



- **CLEPA supports the approach to have only one valid CRS standard in force in the future, on which we as CRS industry can focus on, but asks for an adequate time period to implement this transition sensibly.**
- **The development process of new booster seats G2 & G2/3 products already is under progress and the proposed phase out date will make these developments obsolete .**
- **Countries like CN or BR aligned their CRS standards with R44 and need some time to adapt their standards. This concern was already mentioned from CN when the phase out of G0/0+/1 was presented at the 59th GRSP session ([Report, page 9](#))**

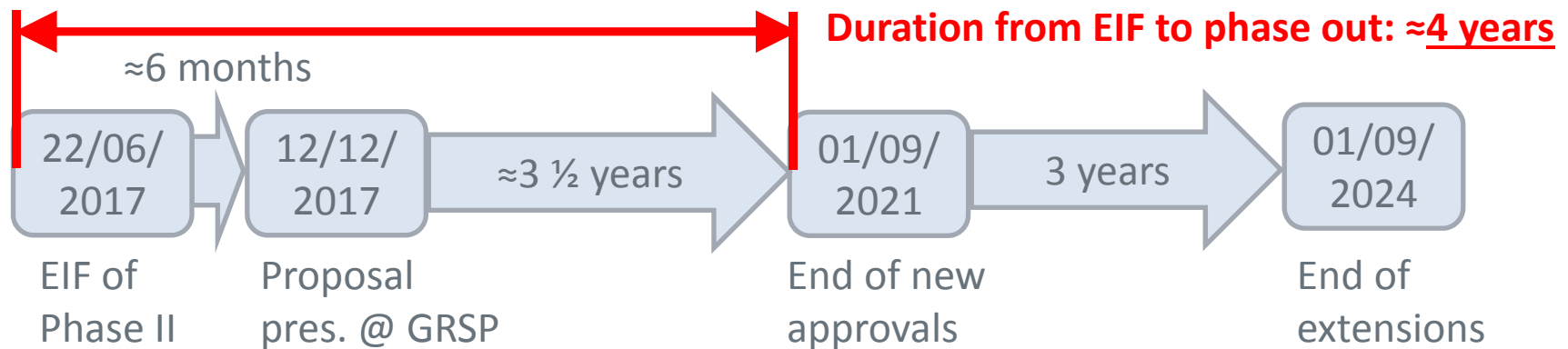
Proposal for alternative phase out dates



Therefore CLEPA believes a similar timeline for the phase out of G2 & G2/3 in R44 as it was implemented for G0/0+/1 would be more sufficient and we propose the following dates:

- **End of new approvals:** **01 September 2021**
- **End of extensions:** **01 September 2024**

Proposed timeline for phase out of G2 & G2/3 from CLEPA:



CLEPA approach to find the best compromise



Using the same approach as for previous ANEC proposal to phase out integral Isofix CRS from R44 (ECE/TRANS/WP.29/2016/102) CLEPA would like to propose :

- to postpone the implementation date of the phase out of booster seats*
- to clarify whether multi-group CRSs are affected by the ANEC proposal*

CLEPA suggestion for an alternative wording:

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.”