



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

Informal document GRSP-61-33
(61st GRSP, 08-12 May 2017
agenda item 17)

Regulation 129

CLEPA response to 2017-61-28

IMPROVEMENTS TO THE USABILITY OF ECRS



There have been many reports of the shortcomings of Reg.44 CRSs in the field

The Informal Group developing Reg.129 has listened to the issues and made many changes to the way ECRSs are designed and labelled.

Reg.129 ECRSs have not been in the field for long, and have yet to prove themselves.

COMBINING TYPES IN REGULATION 129



Text from 02 Series of R129 already adopted by WP29, coming into force this summer

- 3.2.2. The applicant shall indicate the kind of application:
- (a) Application for an i-Size Enhanced Child Restraint Systems; or
 - (b) Application for a specific vehicle ISOFIX; or
 - (c) Application for a i-Size booster seat Enhanced Child Restraint System; or
 - (d) Application for a specific vehicle booster seat Enhanced Child Restraint System;
 - (g) Or any combination of (a),(b),(c) and (d) as long as they fulfil paragraphs 5.4.2.2. and 6.1.3.3.

COMBINING TYPES IN REGULATION 129



Meaning of **WP29 already adopted text “(g) Or any combination of (a),(b),(c) and (d).”**

Allows the combinations any of the following types:

- 1 ISOFIX attached forward facing integral systems
- 2 ISOFIX attached rearward facing integral systems
- 3 ISOFIX and belt attached non-integral booster seat (with back)
- 4 Belt only attached non-integral booster seat (with back)

Combinations of the above are already being developed ready to approve this year when the adopted text comes into force.



Combining Integral and non-integral

R44 CRS

Harness is taken out and potential not to be replaced for the second hand user.

Harness allowed to be taken out and rethreaded to adjust to fit the child.
Potential for misthreading of the harness.

R129 ECRS

No possibility to detach without specific tools, any components not designed to be detached for change of configuration .

Items designed to be detached shall be designed to avoid risk of incorrect assembly and use

Any harness belt shall be capable of its full range of adjustment **without disassembly.**

ADDRESSING MISUSE IN REGULATION 129



Combining Integral and non-integral

| R44 CRS | R129 ECRS |
|---|--|
| <p>Children in R44 allowed to use a booster seat or a booster cushion too soon, from a mass of 15kg.</p> <p>(NB. For booster cushions R44 has a recent new minimum height limit of 125cm)</p> | <p>Integral harness height increased to fit 95th percentile child torso of child up to 100cm height .</p> <p>Prohibited use, of booster seats with a back, below child height of 100cm.</p> <p>Increased internal space requirement of booster seat with a back.</p> <p>(NB. Future requirements for Booster cushions in R129 should follow the recent change in R44, minimum height of 125cm)</p> |



Combining Integral FF and Integral RF

R44 CRS

Misused systems typically with poor labelling of belt routing.

R129 ECRS

Modules allowed to be clipped into an ISOFIX attached base.

(NB. For phase 3, improvements made to labelling of belt routing including identification of lap/diagonal belt. To address current shortcomings in R44)



| Combining Integral FF and Integral RF | |
|--|--|
| R44 CRS | R129 ECRS |
| Children move from RF to FF too soon. | Children stay RF for longer |
| Rear facing R44 products are too small. | R129: Min Internal space requirement and harness height increased to fit 95th percentile child torso of child up to at least 83cm height |
| R44 allows children to use FF CRSs at 9kg. | R129 prohibits the use of FF ECRSs before 15 Months of age |

ADDRESSING MISUSE IN THE 03 SERIES OF AMENDMENTS TO REG 129



The informal group has responded to reported misuse with R44 products by requiring:

Improved marking for belt attached restraints

Fitting labels

- min dimension requirement

- required on both sides of ECRS

- visible in correct orientation relative to the vehicle.

Impact shields to be clearly labelled

Slide 9

HM1

slide unfinished

HYND, Marianne, 10/05/2017



THE 03 SERIES OF AMENDMENTS TO REG 129

All belt path colouring on product
at least the width of the adult belt (no spots or flag labels allowed!)

Additional labels required (of min dimensions)
indicate which part of the adult belt goes into a belt path



A

Belt routing icon to be used on or near belt guiders



B

OR



C

Belt routing icon to be used on installation label

Slide 10

HM2

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HYND, Marianne, 10/05/2017

CONCERNS



Changes to R129 are being suggested “late in the day”

Creates an unreasonable burden on industry

Disallowing the combinations of “types” puts a large financial burden on the consumer

There is no evidence base relating to R129 products to support these late changes

The issues in the field are with R44 products, not R129 products.

The current improvements to R129 products should be realised before adding more restrictions

Changes in the direction of R129 should be supported by a cost benefit analysis.

TO BE CONSISTENT WITH THE ADOPTED TEXT OF THE 02 SERIES



Paragraph 3.2.2., amend to read:

"3.2.2. The applicant shall indicate the kind of application:

- (a) Application for an i-Size Enhanced Child Restraint Systems; or
- (b) Application for a specific vehicle ISOFIX; or
- (c) Application for a i-Size booster seat Enhanced Child Restraint System; or
- (d) Application for a specific vehicle booster seat Enhanced Child Restraint System; or
- ~~(e) Or any combination of (a), (b), (c) and (d) as long as they fulfil paragraphs 5.4.2.2. and 6.1.3.3.~~
- (e) Application for a Universal belted Enhanced Child Restraint Systems; or**
- (f) Application for Specific vehicle belted Enhanced Child Restraint Systems; or**
- (g) Or any combination of (a),(b),(c) and (d) as long as they fulfil paragraph 5.4.2.2.and 6.1.3.3.**
- (h) Or any combinations of (c), (d), (e) and (f) as long as they fulfil paragraph 5.4.2.2.and 6.1.3.3."**