

Proposal for Supplement 1 to the 03 series of amendments to Regulation No. 129 (Enhanced Child Restraint Systems)

The text reproduced below was prepared by the experts from the European Association of Automotive Suppliers (CLEPA). It proposes a supplement to the proposed 03 series of amendments to UN Regulation No. 129 (ECE/TRANS/WP.29/2018/45) to clarify the definition of an “infant carrier”. Modifications to the text of the 03 series of amendments to UN Regulation No. 129 are marked in bold for new characters and strikethrough for deleted characters.

I. Proposal

Paragraph 2.26. amend to read:

“2.26. *"Infant carrier"* means an Integral Enhanced Child Restraint System ~~that restrains a child up to 15 months old and up to 83 cm stature~~ intended to accommodate the child in a rearward-facing semi-recumbent position. It is so designed as to distribute the restraining forces over the child's head and body excluding its limbs in the event of ~~the a~~ frontal collision. It is designed to be removed from the vehicle with the child inside, and without opening any harness, and to be carried ~~it~~ outside of the vehicle.”

II. Justification

1. The 03 series of amendments to UN Regulation No. 129 specify additional labelling requirements that are applicable to belt-attached infant carriers only. These labelling requirements were intended to address specific types of misuse observed in these child restraints. It was necessary, therefore, to define an “infant carrier” in the regulation.
2. The definition of infant carrier introduced in the 03 series of amendments to UN Regulation No. 129 describes the appearance and function of infant carriers, but also specifies limits on their use (children up to 15 months only) and type-approval (up to 83 cm stature). This is potentially in conflict with the present stature requirements in paragraph 6.1.2.3 of the regulation. It is also inconsistent with the aim of keeping children rear-facing for as long as possible.
3. Children can receive very good protection from an infant carrier above the age of 15 months (provided they fall within the stature range of the CRS). Furthermore, it is feasible to design an infant carrier that complies with the internal and external dimensions for statures greater than 83 cm. CLEPA proposes, therefore, to remove this part of the definition.