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Item 20 of the provisional agenda

UN Regulation No. 129 (Enhanced Child Restraint Systems)**Proposal for Supplement 7 to the 01 series of amendments to
UN Regulation No. 129 (Enhanced Child Restraint Systems)****Submitted by the experts from the European Association of Automotive
Suppliers ***

The text reproduced below was prepared by the expert from the European Association of Automotive Suppliers (CLEPA) to clarify aspects of UN Regulation No. 129. The modifications to the current text of the UN Regulations are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/274, para. 123 and ECE/TRANS/2018/21/Add.1, Cluster 3.1), the World Forum will develop, harmonize and update UN regulations to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.



I. Proposal

Paragraph 6.3.1.1., amend to read:

"6.3.1.1. The Enhanced Child Restraint System manufacturer shall declare in writing that the toxicity of materials used in the manufacture of restraint systems and accessible to the restrained child is in conformity with the ~~relevant parts of EN 71-3:2013+A1:2014 (paragraph 4.2., Table 2, Category III for specific requirements and paragraph 7.3.3. for test methodology)~~ **test requirements of EN 71-3:2019, for a Category III material as defined in paragraph 4.2. Table 2 and following the test method of paragraph 7.2., specifically paragraph 7.2.2., Table 3, Category III sampling method.** Tests confirming the validity of the declaration may be carried out at the discretion of the Technical Service."

Paragraph 6.3.2., amend to read:

"6.3.2. General characteristics

The manufacturer shall declare the maximum and minimum stature of the child that may use each configuration of the Enhanced Child Restraint System.

The stature range shall be verified by measuring the internal geometric characteristics according to paragraph 6.3.2.1., while the external dimensions are adjusted to fit within the applicable size envelope according to paragraph 6.3.2.2."

Annex 6-Appendix 2, Paragraph 2., amend to read:

"2. Enhanced Child Restraint Systems in the i-Size ~~universal, and specific vehicle and restricted~~ categories shall use the following anchorage points: H₁ and H₂."

Annex 18., amend to read:

"Annex 18

Geometrical dimensions of Enhanced Child Restraint Systems

...

~~All lateral dimensions are measured under a contact force of 50 N with the devices described in Figure 2 and Figure 3 of this annex and the following tolerances will applied:~~

~~Minimum Sitting height:~~

~~(a) ——— Up to 87 cm B — 5 per cent;~~

~~(b) ——— From stature from 87 cm and up to 150 cm B — 10 per cent.~~

~~Minimum shoulder height (5 percentile): E1-₂⁺⁰-cm~~

~~Maximum shoulder height (95 percentile): E2-₀⁺²-cm.~~

~~The mass of the devices described in Figure 2 and Figure 3 of this annex shall be 10 kg +/- 1 kg.~~

...

Internal geometry assessment method

This method describes how to conduct the internal geometry assessment, as required by paragraph 6.3.2.1., to verify the stature range of the Enhanced Child Restraint System declared by the manufacturer.

This assessment shall be carried out for each of the following:

- (a) For each ECRS orientation (e.g. rearward and forward facing);
- (b) For each ECRS type (e.g. integral and non-integral);
- (c) For any removable insert (e.g. for use as described by manufacturer's instructions);
- (d) For each occupant restraint method (e.g. harness and shield).

The internal geometry assessment should be conducted with the ECRS placed on a flat surface or connected to a base in the case of ECRS modules.

For integral or non-integral ECRS the device shown in Annex 18, Figure 2 shall be used.

For ECRS with an impact shield the device shown in Annex 18, Figure 3 shall be used.

The mass of the devices described in Figure 2 and Figure 3 shall be 10 kg +/- 1 kg.

1. Determining the Minimum Occupant size

The ECRS should be adjusted to fit the smallest occupant (i.e. headrest height, harness height adjustment, appropriate insert, internal padding, impact shield position), while still fitting within the required ISO volumetric envelope as defined in paragraph 6.3.2.2.

The measurement device shall then be placed in the ECRS. The device shall be aligned centrally to the ECRS.

All measurements shall be taken with the device base in contact with the seat pan of the ECRS and the device backrest in contact with the backrest of the ECRS. **All lateral dimensions shall be measured under a contact force of 50 N with the devices described in Figure 2 and Figure 3 of this annex.**

The measurements shall be taken in the following order:

1.1. Minimum Shoulder Height (E1)

...

1.1.2. For non-integral ECRS

This measurement shall be taken when the top of the shoulder height cylinders of the device are aligned without interference with the lowest part of the headrest. **A 2 cm tolerance may be subtracted from the minimum shoulder height measurement.**

1.1.3. For ECRS with an impact shield

This measurement shall be taken when the top of the shoulder height cylinders of the device are aligned without interference with the lowest part of the headrest. **A 2 cm tolerance may be subtracted from the minimum shoulder height measurement.**

...

2. Determining the Maximum Occupant Size

The measurement ... to the ECRS.

All measurements shall be taken with the device base in contact with the seat pan of the ECRS and the device backrest in contact with the backrest of the ECRS. All lateral dimensions shall be measured under a contact force of 50 N with the devices described in Figure 2 and Figure 3 of this annex.

The measurements shall then be taken in the following order:

..."

II. Justification

1. The European Committee for Standardization (CEN) published EN 71-3:2019 on 10 April 2019. This supersedes previous versions of the standard, which must be withdrawn by October 2019. It is necessary, therefore, to update UN Regulation No. 129 to refer to this latest version.
 2. Annex 6, Appendix 2 refers to Enhanced Child Restraint Systems (ECRS) in the “restricted” category. This is a copy-and-paste error from UN Regulation No. 44. The restricted category is not used in UN Regulation No. 129 and any references to it should be deleted.
 3. Annex 18 was amended by Supplement 2 to the 02 series (and Supplement 3 to the 01 series) to specify a detailed procedure for carrying out the internal geometry assessment. This included provisions on the use (or not) of measurement tolerances for certain CRS types. However, the use of tolerances for all CRS types was also specified in the original text at the start of the annex. This original text was not changed by Supplement 2 to the 02 series. As a result, the regulation now includes some contradictory statements and grey areas on the use of tolerances. This proposal removes these contradictions and places all measurement and tolerance provisions together within the assessment procedure.
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