

Proposal for Supplement 18 to the 04 series of amendments to UN Regulation No. 44 (Child Restraint Systems)

**Submitted by the expert from the European Association for the
Coordination of Consumer Representation in Standardization on behalf
of Consumers International ***

The text reproduced below was prepared by the expert from the European Association for the Coordination of Consumer Representation in Standardization (ANEC) on behalf of Consumers International (CI). It introduces an amendment to UN Regulation No. 44 (Child Restraint System (CRS)). The modifications to the existing text of the UN Regulation 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 6.1.3., 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

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

With:
CRS: Child restraint system
A: Applicable
NA: Not Applicable

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

(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.

...

(3) New approvals and extensions will be granted in accordance with paragraphs 17.16 to ~~17.24~~**17.23**.

Insert new paragraphs 17.22. to 17.25., to read:

"17.22. As from 1 September 2021, Contracting Parties applying this Regulation shall not be obliged to accept type approvals issued according to this Regulation, first issued after 1 September 2021.

17.23. Until 1 September 2023, Contracting Parties applying this Regulation shall accept type approvals issued according to the 04 series of amendments to this Regulation, first issued before 1 September 2021.

17.24. As from 1 September 2023, Contracting Parties applying this Regulation shall not be obliged to accept type approvals issued in accordance with this Regulation.

17.25. Notwithstanding paragraph 17.24., Contracting Parties applying this Regulation shall continue to accept type approvals of vehicle specific "built in" or specific vehicle "built in" child restraint systems issued according to the 04 series of amendments to this Regulation."

II. Justification

1. WP 29, in its 179th session, adopted the proposal to establish provisions that allow Enhanced Child Restraint Systems of the booster cushion category to be included in the scope of UN Regulation No. 129, as supplement 3 to the 03 series of amendments.

2. Booster cushions can then be approved according to either UN Regulations Nos. 44 or 129 at the discretion of the manufacturer, potentially for an undefined period.

3. CI and ANEC consider it undesirable that CRS manufacturers are still allowed to start developing new products according to UN Regulation No. 44 for an undefined period, resulting in:

(a) Two categories of products offering two levels of protection that can be introduced on the market;

(b) Confusion among consumers (mass-based versus stature-based);

(c) Less encouragement for manufacturers to develop products to the latest standard.

4. All CRS categories are now covered by UN Regulation No. 129, thus paving the way to promote one single Regulation.

5. More Contracting Parties to the 1958 Agreement have signed UN Regulation No. 129 than UN Regulation No. 44. There are no Contracting Parties that signed only UN Regulation No. 44 without signing UN Regulation No. 129. Hence, there is no risk that newly developed ECRS would be withheld from certain markets.

6. Therefore, CI and ANEC propose that no new approvals of UN Regulation No. 44 be granted to CRS as of [1 September 2020], and that transitional provisions will be amended accordingly.