ANEC calls for support for proposal to improve UN Regulation No. 44 on Child Restraint Systems to ensure the highest protection practicable for children travelling by car

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ANEC, the European consumer voice in standardisation, calls on UNECE WP29\(^1\) to adopt the proposal for Supplement 18 to the 04 series of amendments to UN Regulation No. 44 (Child Restraint Systems)\(^2\), endorsed by experts in its Working Party on Passive Safety (GRSP)\(^3\), following a proposal from the expert appointed by the European Commission.

The amendment is to clarify that certain belt-guides and straps can be eligible for type-approval only as a part of a Child Restraint System and not as a free-standing Child Restraint System.

We and other safety experts have warned for years that belt-guides and straps may place the child at risk of serious injury if used in the car as a free-standing Child Restraint System. This use must be stopped in order to ensure the safety of some of the youngest and most vulnerable of consumers.

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\(^1\) [https://bit.ly/3cLb0LH](https://bit.ly/3cLb0LH)
\(^2\) [https://bit.ly/36oUNtD](https://bit.ly/36oUNtD)
**Background**

A Child Restraint System (CRS) must receive **type-approval** by a national type-approvals authority before being placed on the market. Type-approval allows the CRS to be sold and used not only in the European Union, but in all countries that have adopted Regulation No. 44.

The type-approval procedure includes a **simple frontal crash test** that features a dummy seated in the CRS. The test sled carrying the CRS undergoes an impact that mimics a real-life collision. Experts acknowledge that the test configuration is a simplified representation of reality, and that the test dummy is limited in its human behaviour (‘bio-fidelity’). **Hence the dummy may not reflect injuries a real child could suffer.**

Because of this, Regulation 44 is intended to forbid CRS in the form of belt guides and straps that could see a child harmed in of a collision, **irrespective of the results of the crash test.** However, its requirements have not stopped several manufacturers from seeking type-approval for a product, **and at least one has succeeded in placing a product on the market** to ANEC’s knowledge.

Hence the need for clarification of Regulation No. 44 to be **explicit** in prohibiting the use of certain belt-guides and straps as standalone CRS. This is the purpose of Supplement 18.

**The GRSP is unanimous in its support for Supplement 18 with the lone exception of Poland.**

**But as the EU votes as a bloc in UNECE WP29 which will decide whether to adopt Supplement 18, it is key to have all Member States on board for the vote in June 2020.**

ANEC therefore calls on all EU Member States, as well as on countries outside the EU, to support Supplement 18 in order to ensure improved protection of some of the youngest and most vulnerable consumers.

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About ANEC

ANEC is the European consumer voice in standardisation, defending consumer interests in the development of technical standards and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

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