Japan’s comment on GRSP/2020/12 regarding the test procedure for the height of head restraints in the case of vehicles having a low roof construction

The 68th session of GRSP
7-11, December 2020

JAPAN AUTOMOBILE STANDARDS INTERNATIONALIZATION CENTER
Concerns from Japan

These two factors should be took into consideration among GRSP experts.

- **Range of exempted vehicles**: This exemption could be applicable to a wide range of passenger cars (not only sport-type cars).

- **Safety risk on tall occupants**: Risk of whiplash injury to taller occupants could increase due to unadjustability and small height of head restraint.
Example of small car

Design seating reference position (ex; 50M)

Recline seat back

Seat lift up

Smaller seating ideal position (ex; 5F)
Example of low roof sedan
Thank you!