

Invalid Approval E20 44R 044013 Smart Kid Belt

History:

GRSP-50 meeting minutes (December 2011)

Discussion on the approval issued on a belt guide device comparable to SKB.

Approval was withdrawn.

Related Documents

GRSP-50-09 (CLEPA)

GRSP-50-25 (CLEPA)

GRSP-50-34 (FRANCE/GERMANY)

GRSP-51-31 (NL)

GRSP-66-30 (SPAIN)

GRSP-66-38 (JAPAN)

GRSP-67-05 (NL)

GRSP-67-36 (Consumer International/ANEC)

GRSP-68-24 (NL)

And also:

<https://www.adac.de/rund-ums-fahrzeug/tests/kindersicherheit/smart-kid-belt/>

<https://www.which.co.uk/news/2020/11/dont-buy-this-potentially-dangerous-child-car-seat-accessory/>

ADAC and Consumer International carried out tests in a car body using Q dummies, confirming the findings in GRSP-68-24 and the sensitivity of the SKB device potentially resulting in abdominal injuries.

Statements:

- SKB is a comfort device; behaviour of the system is very similar to the situation with adult belt only
- ECE R44.04 and ECE R129 both have a simplified test procedure consisting of static and dynamic test requirements.
- Limitation for the used test buck and test dummies (P and Q dummies)
- Even dummy on the test bench, just the adult seat belt, for both procedures and dummies, will result in a "pass" with regarding compliance with the dynamic requirements only.
- A CRS needs to offer protection in all kinds of crashes. Not only 0-degree forward direction on a test bench.
- Not a difference in interpretation. Several requirements in ECE R44.04 are simply not met.
- Why talk for several years before reaching a conclusion ?
- Proposal to carry out more tests according to ECE R44.04. Why ? The outcome is known. Only creating more delay.
- NL seeks support from CP's to have GRSP include a clear statement in the meeting minutes that includes:
 1. device does not meet the requirements of the legislation
 2. There is no possibility to bring this device in line with the requirements of the legislation
 3. There is no legal base for the approval E20 44R-04 4013
 4. Therefore the approval is invalid
 5. GRSP is urging PL to withdraw the approval.

