
UN Regulation No. 107 (General construction M₂ & M₃)

Position paper on provisions for the safe transport of children in buses and coaches

Submitted by the experts of OICA

The text reproduced below was prepared by the OICA experts on the current work of Informal Working Group Safer Transport of Children in Buses and Coaches (IWG-STCBC).

The document summarizes the current activities of the IWG-STCBC and provides OICA's initial observation on those discussions and seek further guidance on how GRSG may take forward into regulation UN-R107 if needed.

I. Executive Summary

In 2019, UNECE GRSP and WP.29 agreed to establish an Informal Working Group STCBC to work on a new regulation to ensure safe transport of children in buses and coaches, but not focusing on vehicles especially dedicated to the transport of school children. Main aim is to establish requirements for securing children in M2 and M3 vehicles, based on real accidents in these type of vehicles with the priority of avoiding ejection of occupants.

In the meantime, five meetings of the IWG took place. The IWG assumed that vehicles of category M2 and M3, classes II, III and B should be covered. Current discussion includes the option to use Child Restraint Systems (CRS) according to UN-R129 developed for being fitted to passenger cars of category M1 and taking into account typical front, rear and side-impact-accident-scenarios of passenger cars.

During the consultations within IWG STCBC, OICA noted that this approach contradicts UN-R107 in respect of the mandatory requirements especially regarding the typical interior arrangement and seating layout of buses and coaches.

II. OICA observations on the work to date

OICA welcomes the work of the IWG-STCBC, however OICA notes that there are some serious issues that will need to be considered as the proposals under discussion would have a significant influence on Buses and Coaches and their interior and seating layout:

- Child Restraint Systems (CRS) that are approved according to UN-R129 would not seem to be compatible with Bus interior regulation according to UN-R 107.
- The accident data provided by France, Germany, UK, Spain and Sweden shows
 - ✓ That the main safety issue for children is related to them travelling unrestrained as there is a danger of ejection in the case of an accident.
 - ✓ That statistically the injury risk is with children above 9 years old. It is unlikely therefor that the use of a CRS would have a positive impact on this age group.
- Safety belt installation in class II specification would need to be harmonized to ensure the equipment of such vehicles with safety belts.
- Requirements for the use of multiple CRS's in buses would lead to a significant reduction of the number of passenger seats in the vehicle.
- Given the size of current CRS's used in passenger cars, it may cause practical issues for the movement of passengers inside the vehicle.

- Additionally, there is a need to consider how Bus and coach operators would deal with the practical aspects of the installation of multiple CRS's (Assistance to parents and correct installation of CRS)

III. Questions to GRSG

1. Considering the available accident data statistics and injury risks, does GRSG believe that there is a need for Child Restraint Systems (CRS) installation in buses and coaches?
2. Is GRSG planning to include requirements on numbers and technical specification of children positions / child seat /CRS positions into UN-R107 or amend UN-R14 and R16?
3. Since UN-R129 CRSs installation is incompatible with UN-R107 requirements, how will these issues be resolved?
4. Is it the intention that the CRS will be provided by customers when they travel with a child, or will the CRS need to be provided by the operator (therefore stowed on the bus when not in use)?
5. Will the CRS use obligations for operators change accordingly?
6. Terms of reference of the IWG to be amended accordingly?

A detailed description of OICA observations can be found in a separate informal document.