

Proposal for Supplement 10 to the 03 Series of Amendments to UN Regulation No. 129 (Enhanced Child Restraint Systems) *

Submitted by the expert from the Netherlands

The text reproduced below was prepared by the expert from the Netherlands on behalf of the Technical Services Group (TSG) aiming to clarify the single belt route principle mentioned in paragraph 3.2.2.. The modifications to the existing text of the UN Regulation by document ECE/TRANS/WP.29/GRSP/2023/11 are marked in “bold black“ for new or strikethrough for deleted characters. The modifications made by this document are marked in “**(bold) blue**” for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2023 as outlined in proposed programme budget for 2023 (A/77/6 (Sect. 20), table 20.6), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.

I. Proposal

Paragraph 3.2.2., amend to read:

- "3.2.2. The applicant shall indicate the kind of application:
- (a) Application for an i-Size Enhanced Child Restraint Systems; or
 - (b) Application for a specific vehicle ISOFIX Enhanced Child Restraint System; or
 - (c) Application for a i-Size booster seat Enhanced Child Restraint System; or
 - (d) Application for a specific vehicle booster seat Enhanced Child Restraint System; or
 - (e) Application for a Universal Belted Enhanced Child Restraint Systems; or
 - (f) Application for a Specific vehicle Belted Enhanced Child Restraint Systems; or
 - (g) Application for a Universal booster cushion Enhanced Child Restraint System; or
 - (h) Application for a Specific vehicle booster cushion Enhanced Child Restraint System; or
 - (i) Any combination of (a), (b), (c), (d), (g) and (h) as long as they fulfil paragraphs 5.4.2.2., 6.1.2. and 6.1.3. provided there is only one belt route²; or
 - (j) Any combination of (c), (d), (e), (f), (g) and (h) as long as they fulfil paragraphs 5.4.2.2., 6.1.2. and 6.1.3. provided there is only one belt route² and that the booster seat and booster cushion is not equipped with ISOFIX connectors."

Insert new paragraph 3.5., to read:

"3.5 an ECRS shall not bear more than one approval number. This provision does not apply for the purpose of approving a module as part of different ECRSs."

Paragraph 5.4.1.1., the reference *to footnote* ², renumber as footnote ³

Paragraph 6.1.3.6., the reference *to footnote* ³, renumber as footnote ⁴

Paragraph 6.3.5., the reference *to footnote* ⁴, renumber as footnote ⁵

Paragraph 7.2.4.3.4., the reference *to footnote* ⁵, renumber as footnote ⁶

II. Justification

1. The proposed amendment does not intend to change the requirements nor the level of stringency. The footnote to paragraph 3.2.2. is added to further clarify the definition of the use of a one belt route. In its current state, the text apparently has been interpreted as to allow the use of a single belt route for each application that an Enhanced Child Restraint System (ECRS) would offer. That way, one belt route for a

² One belt route applies over the entire stature range regardless of the different configurations of use for which the ECRS will be approved: for an ECRS which allows forward and rearward facing orientation, only the one belt route shall be used for both configurations. The same applies for an ECRS which combines integral and non-integral configurations or any other combination that is allowed by this paragraph.

rearward facing ECRS (integral) and a second belt route for a forward facing (non-integral) ECRS has been introduced, making a combination of C and E.

2. The single belt route principle was introduced to limit incorrect use of the belt as much as possible. Under mandate of WP.29 the Informal Working Group (IWG) on Child Restraint Systems (CRS) has worked for several years to develop UN Regulation No. 129 up to the 03 series of amendments.
3. In the 03 series of amendments, the approval of so-called multi-group seats has become possible including the combination of integral (ECRS equipped with harness belt) and non-integral applications (vehicle seat belt used to restrain the child, i.e., booster seats).
4. One of the key focus points was the prevention of the misuse of ECRS. During the fifty-ninth meeting of the IWG, a presentation on belted CRS (CRS-59-10e phase 3 subgroup) was discussed. During the sixty-sixth meeting of the IWG, the Chair of the IWG reminded the delegations, that only one belt route for forward and rearward facing plus integral / non integral CRS would be possible. During the sixty-eighth meeting of the IWG, the expert from Japan commented that if only one belt route for both (integral and non-integral) applications would be provided, then opportunities to have different belt routes on the same product would not be possible.
5. At the sixty ninth session of the Working Party on Passive Safety (May 2021), the expert from the Netherlands introduced GRSP-69-09, asking for guidance on how strictly the "one belt route" defined by the current text of UN Regulation No. 129, 03 series of amendments, (Enhanced Child Restraint Systems) should be interpreted. GRSP agreed on the interpretation that the "one belt route" shall be strictly interpreted; only asymmetrical attachments can still be regarded as a "one belt route".
6. Despite all these efforts, products have been put on the market which do not comply with the principle of the one belt route. Therefore, the clarification herein creates a clear and level playing field, and at the same time, prevents the incorrect and possibly unsafe installation of the child restraint (i.e., misuse).
7. [in order to prevent circumvention of paragraph 3.2.2., it shall be clarified that an ECRS shall be approved under one approval \(number\) only.](#)