

## **Proposal for draft Supplement 3 to UN Regulation N° 145 (ISOFIX anchorage systems, ISOFIX top tether anchorages and i-size)**

### **I. Proposal**

*Paragraph 5.3.6.*, amend to read:

"5.3.6. Notwithstanding paragraph 5.3.1. in case of integrated "built in" child restraint system(s) the number of ISOFIX positions to be provided shall be at least two minus the number of the integrated "built in" child restraint system(s) of mass groups 0, or 0+, or 1 **or of the specific vehicle built-in Enhanced Child Restraint Systems for use by children up to 105 cm height.**

### **II. Justification**

Paragraph §5.3.6. of UN R145 specifies that the number of ISOFIX positions in a vehicle can be reduced if a built in CRS is installed in that position. The built in CRS is specified to be used by children in mass groups 0, 0+ or 1. This text was developed when child restraints were type approved to meet UN R44. However, UN R44 is being replaced by UN R129 and therefore UN R145 should be adapted accordingly to also reflect the child's height instead.

To reflect the size ranges used in UN R129, OICA suggests using the stature of 100 cm (which is approximately a child weighing 18 kg). This would be aligned with the requirement that non-integral ECRS are not allowed for children with a stature of less than 100 cm (6.1.3.3.) and also with the requirement for toxicity testing in 6.3.1.1 (para 6.3.1.1 does not apply to non-integral ECRS with a stature range of 100 cm or above).

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