

Informal document GRSP-75-18
GRSP 75th session, 27th – 31st May 2024
Agenda Item 13



Ensuring CRS compliance with UN R129 - Update

Submitted by the experts from CLEPA

75th session of GRSP, 27th – 31st May 2024



BACKGROUND

GRSP-74 (Dec. 2023)

- CLEPA highlighted CRS with characteristics / features that **contravene UN R129: [CRS-74-03](#)**
- NL presented guidance on Supplement 10 to UN R129.03 clarifying some **non-compliance issues: [GRSP-74-10](#)**

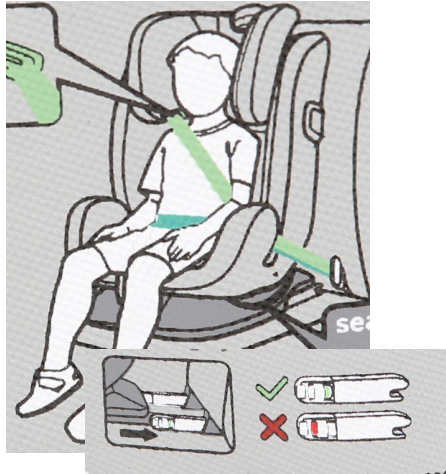
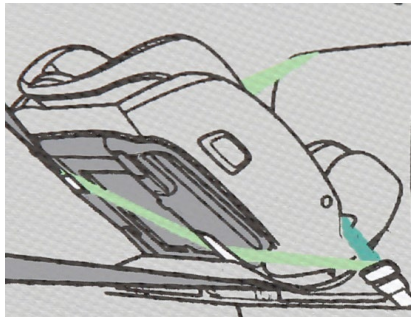
WP.29-192 (March 2024)

- WP.29 endorsed CLEPA's suggestion for CPs to liaise with CLEPA and **discuss the problem at GRSP-75: [.../WP.29/1177](#)**



R129 CRS WITH NON-COMPLIANT FEATURES

Recap – from GRSP-74-03



Belt route 1: Belt-attached integral
(Child: 40-105 cm)

Belt route 2: Belt-attached integral
(Child: 100-145 cm)

CRS 1 (EX Type-approval)

- Two belt routes (para. 3.2.2)
- Non-ISOFIX attachments (para. 6.1.3.2)
- ‘ISOFIX’ on belt-attached integral/booster combination (para. 3.2.2.)

CRS	Authority	Non-compliance
CRS 2	EX	Two belt routes (para. 3.2.2.)
CRS 3	EX	Two belt routes (para. 3.2.2.)
CRS 4	EX	Two belt routes (para. 3.2.2.)
CRS 5	EX	ISOFIX and belt-attached installation options (para. 3.2.2.) No anti-rotation device with approval on test bench (para. 6.6.4.1.2.)
CRS 6	EX	ISOFIX and belt-attached installation options (para. 3.2.2.)
CRS 7	EY	Two belt routes (para. 3.2.2.)
CRS 8	EZ	Two belt routes (para. 3.2.2.)
CRS 9	EZ	Two belt routes (para. 3.2.2.)
CRS 10	EZ	Two belt routes (para. 3.2.2.)

STATUS OF NON-COMPLIANT CRS - MAY 2024



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CRS	Authority	Non-compliance	Status
CRS 1	EX	Two belt routes (para. 3.2.2.) Non-ISOFIX attachments (para. 6.1.3.2) 'ISOFIX' on belt-attached integral/ booster combination (para. 3.2.2.)	Still being sold*
CRS 2	EX	Two belt routes (para. 3.2.2.)	Still being sold
CRS 3	EX	Two belt routes (para. 3.2.2.)	Still being sold
CRS 4	EX	Two belt routes (para. 3.2.2.)	Still being sold
CRS 5	EX	ISOFIX and belt-attached installation options (para. 3.2.2.) No anti-rotation device with approval on test bench (para. 6.6.4.1.2.)	Still being sold*
CRS 6	EX	ISOFIX and belt-attached installation options (para. 3.2.2.)	Still being sold
CRS 7	EX	R44 and R129 type-approval (para. 5.2.)	Still being sold

Type-Approval Authority 'X': One more CRS found since Dec. 2023

STATUS OF NON-COMPLIANT CRS - MAY 2024



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CRS	Authority	Non-compliance	Status
CRS 8	EY	Two belt routes (para. 3.2.2.)	Still being sold
CRS 9	EZ	Two belt routes (para. 3.2.2.)	Still being sold
CRS 10	EZ	Two belt routes (para. 3.2.2.)	Still being sold*
CRS 11	EZ	Two belt routes (para. 3.2.2.)	Still being sold
CRS 12	EZ	Two belt routes (para. 3.2.2.)	Still being sold
CRS 13	EZ	Two belt routes (para. 3.2.2.)	Still being sold
CRS 14	EZ	Two belt routes (para. 3.2.2.) More than one type-approval label (para. 3.5 – Supp. 10)	Unavailable
CRS 15	EZ	Two belt routes (para. 3.2.2.) i-Size, but seat belt is anti-rotation device (para. 2.12) ISOFIX and belt-attached installation options (para. 3.2.2.)	Still being sold

Type-Approval Authority 'Z': Four more CRS found since Dec. 2023

EXAMPLES OF KNOWN ACTION TAKEN



CRS 1

- Two belt routes (para. 3.2.2.)
- Non-ISOFIX attachments (para. 6.1.3.2.)
- 'ISOFIX' on belt-attached integral / booster combination (para. 3.2.2.)

**Original type-approval
≤ 2021**

- **Two belt routes** (para. 3.2.2.)
- ~~Non-ISOFIX attachments~~ (para. 6.1.3.2.)
- ~~'ISOFIX' on belt-attached integral / booster combination~~ (para. 3.2.2.)

**Type-approval extension
2022**

- Original version shown on CRS manufacturer website – not in latest range
- Original version shown on some retailer websites

**Status of CRS on market
May 2024**

EXAMPLES OF KNOWN ACTION TAKEN

CRS 5



- ISOFIX or seat belt installation options (para. 3.2.2.)
- No anti-rotation device with approval on test bench (para. 6.6.4.1.2.)

Original type-approval
≤ 2021

- ~~ISOFIX or seat installation options (para. 3.2.2.)~~
- Seat belt guides remain in place for aircraft use
- No anti-rotation device with approval on test bench (para. 6.6.4.1.2.)

Type-approval extension
?

- New version described on CRS manufacturer website - photos and manual download are old version
- Retailer websites unclear

Status of CRS on market
May 2024

MARKET SURVEILLANCE ACTIVITIES



GRSP-74 and after

- Several Contracting Parties suggested they would raise awareness with their **Market Surveillance Authorities (MSAs)**
- Have MSAs been informed?
- Have CRS market surveillance programmes started?

HAVE FURTHER ACTIONS TAKEN PLACE?



The 1958 Agreement is very clear

1. Should a Contracting Party applying a UN Regulation find that certain wheeled vehicles, equipment or parts bearing approval markings issued under the said UN Regulation by one of the Contracting Parties, do not conform to the approved types or the requirements of the said UN Regulation, they shall advise the approval authority of the Contracting Party which issued the approval.

Have any CPs advised the approval authorities that issued the approvals?

The Contracting Party that issued the approval shall take the necessary steps to ensure that the non-conformity is rectified.

Have the CPs involved taken necessary steps to rectify the approvals?

2. When the non-conformity is due to non-compliance with the technical requirements specified in a UN Regulation, as referred to in Article 1.2.(b), the Contracting Party that issued the approval shall immediately inform all other Contracting Parties about the situation and shall provide regular advice to Contracting Parties of the steps it is taking, which may include, if necessary, the withdrawal of the approval.

Have the CPs involved informed all other CPs about the steps being taken?

HAVE FURTHER ACTIONS TAKEN PLACE?



The 1958 Agreement is very clear

<p>After having considered the potential impact on vehicle safety, protection of the environment, energy saving or the performance of anti-theft technology, Contracting Parties may prohibit the sale and use of such wheeled vehicles, equipment or parts in their territory until this non-conformity is rectified. In such a case, these Contracting Parties shall</p>	<p>Have any CPs prohibited the sale of these CRS?</p>
<p>3. Notwithstanding the provisions of paragraph 1 of this Article, if a non-conforming product, as referred to in paragraph 2 of this Article, has not been brought into conformity within a period of three months, the Contracting Party responsible for the approval shall temporarily or permanently withdraw the approval. By exception, this period</p>	<p>Have the CPs involved withdrawn the approvals?</p>

• Can non-compliant CRS continue to be sold indefinitely?

Thank you!

CLEPA

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