
Proposal for Supplement 14 to the 04 series of amendments to UN Regulation No. 44 (Child Restraint Systems)

Submitted by the expert from the European Association for the Co-ordination of Consumer Representation in Standardisation on behalf of Consumers International

The text reproduced below was prepared by the expert from the European Association for the Co-ordination of Consumer Representation in Standardization (ANEC) on behalf of Consumers International (CI). It introduces an amendment to UN Regulation No. 44 (Child Restraint System (CRS)). The modifications to the existing text of the UN Regulation are marked in bold for new or strikethrough for deleted characters.

I. Proposal

Paragraph 6.1.3., amend to read:

"6.1.3. According to the category which it belongs to, the child restraint shall be secured to the vehicle structure or to the seat structure.

Possible configurations for approval Groups / categories table

Group category		Universal (1)		Semi-universal (2)		Restricted		Specific vehicle	
		CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS
0	Carry-cot	A	NA	A	A(3)	A	NA	A	A(3)
	Rearward facing	A	NA	A	A (3)	A	NA	A	A(3)
0+	Rearward facing	A	NA	A	A(3)	A	NA	A	A(3)
I	Rearward facing	A	NA	A	A(3)	A	NA	A	A(3)
	Forward facing (integral)	A	A (3)	A	A(3)	A	NA	A	A(3)
	Forward facing (non-integral)	NA	NA	NA	NA	NA	NA	NA	NA
	Forward facing (non-integral – see paragraph 6.1.12.)	A	NA	A	NA	A	NA	A	A(3)
II	Rearward facing	A	NA	A	NA	A	NA	A	A
	Forward facing (integral)	A	NA	A	NA	A	NA	A	A

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Group category	Universal (1)		Semi-universal (2)		Restricted		Specific vehicle	
	CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS	CRS	ISOFIXCRS
Forward facing (non integral)	A(4)	NA	A(4)	NA	A(4)	NA	A(4)	A(4)
Rearward facing	A	NA	A	NA	A	NA	A	A
Forward facing (integral)	A	NA	A	NA	A	NA	A	A
Forward facing (non integral)	A	NA	A	NA	A	NA	A	A

With:
 CRS: Child restraint system
 A: Applicable
 NA: Not Applicable

(1) ISOFIX universal CRS means forward facing restraints for use in vehicles with positions equipped with ISOFIX anchorages system and a top tether anchorage.
 (2) ISOFIX semi universal CRS means:
 • Forward facing restraints equipped with support leg or
 • Rearward facing restraints equipped with a support leg or a top tether strap for use in vehicles with positions equipped with ISOFIX anchorages system and a top tether anchorage if needed
 • Or rearward facing restraints, supported by the vehicle dashboard, for use in the front passenger seat equipped with ISOFIX anchorages system,
 • Or lateral facing position restraint equipped if needed with an anti-rotation device for use in vehicles with positions equipped with ISOFIX anchorages system and top tether anchorage if needed.
 (3) New approvals and extensions will be granted in accordance with paragraphs 17.16 and 17.17.
 (4) **New approvals and extensions will be granted in accordance with paragraphs 17.18 and 17.19.**

Paragraph 12, amend to read:

"12. Conformity of production and routine tests

Field Code Changed

The conformity of production procedures shall comply with those set out in the Agreement, ~~Appendix 2~~ **Schedule 1** (E/ECE/324 - E/ECE/TRANS/505/Rev.3), with the following requirements:"

Insert new paragraphs 17.18. and 17.19., to read:

17.18. As from 1 September 2019, no new approvals shall be granted under this Regulation to non-integral class forward facing child restraint systems of group 2 or group 2/3, unless they form part of a multi-group child restraint system that will also be approved for group 1 and above.

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17.19. As from 1 September 2023, no extensions shall be granted under this Regulation to non-integral class forward facing child restraint systems of group 2 or group 2/3, unless they form part of a multi-group child restraint system that will also be approved for group 1 and above."

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II. Justification

1. Phase 2 of UN Regulation No. 129 (non-integral ECRS) entered into force on 22 June 2017.
2. From that date on, non-integral CRS can be approved according to either UN Regulations Nos. 44 or 129 at the discretion of the manufacturer for an undefined period.
3. CI and ANEC consider it undesirable that CRS manufacturers are still allowed to start developing new products according to UN Regulation No. 44 for an undefined period, resulting in:
 - (a) Two categories of products offering two levels of protection that can be introduced on the market (UN Regulation No. 44: no side impact required);
 - (b) Confusion amongst consumers (mass based versus stature based);
 - (c) Less encouragement for manufacturers to develop products to the latest standard.
4. Until today forty-five Contracting Parties to the 1958 Agreement have signed UN Regulation No. 44 and fifty-two UN Regulation No. 129. There are no Contracting Parties that signed only UN Regulation No. 44 without signing UN Regulation No. 129. Therefore, there is no risk that newly developed Isofix **non-integral** CRS would be withheld from certain markets.
5. Therefore CI and ANEC propose that no new approvals of UN Regulation No. 44 be granted to non-integral group 2 or group 2/3 CRS as of [1 September 2019], and that transitional provisions will be amended accordingly.