



TCMV meeting of 17 November 2010
Child Restraint Systems

CLEPA comments on the EU Commission note dated 8 November

CLEPA clearly does not share the conclusions of the EU Commission note on the work of the UNECE GRSP Informal Group on child restraint systems.

Clepa has examined the note. As an active and constant participant to the Informal Group (IG) work, CLEPA would like to express its concerns as regards the key issues raised by the EC note.

1. Informal Group Constitution (§1 of the note)

We don't have at all the same opinion. Participation to the IG meetings was always important where all stake holders were present:

- Member States: F, NL, UK, D, S, I and EC
- Approval & Testing Laboratories (Independent): UTAC F, TRL UK, TUV D, CSI I, IDIADA E, TNO NL, VTI S, DEKRA D
- Car Manufacturers: Audi, Opel, Mercedes, PSA Peugeot Citroën, Renault
- CRS Manufacturers: Britax Römer, Dorel, Takata, Graco
- Consumers: Consumers International, ADAC (D)
- Invited: Australia and Canada (first meetings), NHTSA (attendance in most of the meetings)

The participation to the IG activity has been well balanced between industry and official bodies.

2. Results of the IG to date

The EC note is focussing on specific details and ignores or does reflect the bigger picture on the outcomes of this new Regulation. Among key outcomes are:

- Stature based classification (rather than weight classification), one of the most important achievements to simplify the consumers decision in choosing a seat. Seat design will be based on new anthropometric study realised in France ensuring that the new seats will be constructed on the basis of recent child data.
- New Anthropomorphic Test Devices: A new family of dummies, Q-family. First time where Europe will use head accelerations to qualify the CRS in both frontal and side impacts.
- Phase 1 with ISOFIX ONLY restraints: In order to promote ISOFIX the new Regulation will drive towards I-Size CRS to be installed on I-Size Cars.
- Introducing a side impact test procedure – Another achievement to fill a void in the present Regulation where there is no test procedure at all
- Mandatory rear facing position of children up to 15 months – in fact an extended position from 9 months to 15 months.

- Compatibility of CRS with support leg with cars to simplify the life of the consumer – The IG has established, thanks to a strong collaboration between CLEPA and OICA, key requirements to ensure universal approval of the CRS that are used with support leg

3. Observed Issues with the current proposal

3.1. Discrimination between worst and good performers

The new Regulation will present key challenges for CRS industry. Among key factors that will drive improvements in child safety are:

- Side Impact Protection with Q Dummies and appropriate head acceleration criteria for different occupant sizes (we have nothing today in EU expect for Consumers Tests Stiftung Warentest – ADAC)
- Frontal Impact with Q Dummies with additional performance criteria compared to today's situation

TRL tests to which EU Commission refers were not discussed in details at the IG. EC provided their input to IG at the 21st Meeting! The EC has really to understand that the key mission of the IG is to establish a new Regulation in the sense of a standard to which everyone has to comply with, and NOT a consumer program!

3.2. Quantifications of gains in reducing the misuse

Yes there was no quantification of the reduction of the misuse. However the provisions of the new Regulation will put the consumer/parent in a much better situation than today. Here are the main reasons

- I-size CRSs to be installed in I-Size cars, including in Phase 1 ISOFIX only seats (no belt restraint alternative). It is known from previous misuse research that ISOFIX is one of the best anti misuse solution (today misuse rate is 60 to 80% in 4 EU countries).
- Classification of CRSs based on stature, where the CRS manufacturer will indicate to which stature his restraint system is designed. A big step compared to today where the weight indication is sometimes unclear for consumers (Consumers International communication to GRSP).

3.3. Side Impact

The integration of the side impact protocol is another point in the improvement of safety. The impact velocity has been reduced to be more representative in the velocity of the door at the instant of the contact with the seat. The last tests with this new velocity show that the manufacturers have to innovate to improve the protection of the head especially for the younger children (see table attached).

3.4 Support leg

One of the most important elements of the new Regulation consists of the improvement of the compatibility of the CRS with the vehicle to simplify the life of the consumers. Especially the propositions around the support leg will help to clarify the situation and the responsibilities for both the CRS manufacturers and the car manufacturers. We wish a quick implementation of the changes in R14 and R16 to improve as fast as possible this compatibility.

3.5 Alternative pulse proposed by EC

TRL has defined products as having a bad behaviour and whishes to exclude them from the market. This seems very subjective to us. In the proposition of the EU Commission you can find elements like a new pulse for frontal impact. This type of request is a direct resumption of a protocol from TRL which was used without big success for a new rating of child seats. This more severe pulse which is near the pulse used by the USNCAP (frontal test against a rigid obstacle at 100% overlap) is from our point of view not justified; this type of pulse represents a few percentage of killed, for example 2% of the killed in France. This requirement will put emphasis on the robustness in the detriment of protection in the majority of accidents.

4. Conclusions

Globally seen, the current project seems to be supported by numerous actors especially Consumer International. It replies indeed to the essentials of requests done by this association of consumers which were in the beginning of the working group. We think that sometimes the best is the enemy of the good, we do not see any good reason to postpone the GRSP decision.

Product	Maxi-Cosi Pebble + FamilyFix		Römer Babysafe+Base		Bébé Confort Iseos Isofix	Maxi-Cosi Pearl + FamilyFix			Graco Duologic	
	Q0	Q1,5	Q1,5	Q1,5	Q3	Q1	Q1	Q3	Q3	Q3
Dorel France Test number	LSP-10-4250	LSP-10-4251	LSP-10-4252	LSP-10-4253	LSP-10-4257	LSP-10-4254	LSP-10-4255	LSP-10-4256	LSP-10-4258	LSP-10-4259
ECE_TRANS_WP.29_GRSP_2010_38e Head acc 3ms cum. (g)	75	75	75	75	80	75	75	80	80	80
Head acc 3ms cum. (g)	93	79	75	75	61	78	75	62	48	47
ECE_TRANS_WP.29_GRSP_2010_38e HIC 36	600	600	600	600	800	600	600	800	800	800
HIC 36	574	447	425	449	320	467	462	328	198	203
Initial Velocity (m/s)	6,42	6,41	6,43	6,5	6,48	6,46	6,49	6,46	6,43	6,48

Product	Römer BabySafe Isofix		Römer DUO plus TT	
	Q0	Q1,5	Q1	Q3
Britax Römer Test number	104004	104005	104003	104006
ECE_TRANS_WP.29_GRSP_2010_38e Head acc 3ms cum. (g)	75	75	75	80
Head acc 3ms cum. (g)	94	71	81	69
ECE_TRANS_WP.29_GRSP_2010_38e HIC 36	600	600	600	800
HIC 36	578	344	462	367
Initial Velocity (m/s)	6,38	6,38	6,38	6,41