Swedish & Clepa proposal for clarification of 6.1.3.

6.1.3. in present draft for new regulation

For children under the age of 15 months only lateral facing or rearward facing Child Restraint System shall be used. The use of rearward facing Child Restraint System may be applied to any age of child.

Proposal for new 6.1.3.

For children under the age of 15 months only lateral facing or rearward facing Child Restraint System shall be used.

That means:
1. a CRS designed for children up to 15 months of age shall be rearward facing and accommodate at least a child with a stature of 83 cm.
2. a forward facing CRS shall not be designed to accommodate a stature below 71 cm
3. A convertible seat in its rearward facing configuration shall be able to accommodate a child with a stature up to 83 cm. This shall not preclude a child stature greater than 83 cm.

The use of rearward facing Child Restraint System may be applied to any age of child.

Justification
The whole concept of ensuring an extension of the rear facing position compared to today’s situation is based on age, according to previous discussions in the IG.