Proposal for Supplement 10 to the 04 series of amendments to Regulation No. 44 (Child restraint systems)

Submitted by the expert from the European Association of Automotive Suppliers *

The text reproduced below was prepared by the expert from the European Association of Automotive Suppliers (CLEPA) to update the references to the European standard on toxicity and flammability of materials used to manufacture Child Restraint Systems (CRS). This text is based on an informal document GRSP-56-26 distributed during the fifty-sixth session of the Working Party on Passive Safety (GRSP). The modifications to the current text of UN Regulation No. 44 are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94 and ECE/TRANS/2012/12, programme activity 02.4), the World Forum will develop, harmonize and update Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.
I. Proposal

Paragraph 6.1.5., amend to read

"6.1.5. The child restraint manufacturer has to declare in written form that the toxicity of materials used in the manufacture of restraint systems and accessible to the restrained child is in conformity with the relevant parts of EN 71-2009, part 3. Tests confirming the validity of the declaration may be carried out at the discretion of the test authority. This paragraph does not apply to restraint devices of groups II and III.

The Child Restraint System manufacturer shall declare in writing that the toxicity of materials used in the manufacture of restraint systems and accessible to the restrained child is in conformity with the relevant parts of EN 71-3:2013 (paragraph 4.2., Table 2, Category III for specific requirements and paragraph 7.3.3. for test methodology). Tests confirming the validity of the declaration may be carried out at the discretion of the Technical Service. This paragraph does not apply to restraint devices of groups II and III."

Paragraph 6.1.6., amend to read

"6.1.6. The child restraint manufacturer has to declare in written form that the flammability of materials used to manufacture the restraint system is in conformity with the parts of EN 71-2009 part 2. Tests confirming the validity of the declaration may be carried out at the discretion of the test authority.

The Child Restraint System manufacturer shall declare in writing that the flammability of materials used to manufacture the Child Restraint System is in conformity with the method of section 5.4 of EN 71-2:2011+A1:2014 with a maximum rate of spread of flame of 30 mm/s. Tests confirming the validity of the declaration may be carried out at the discretion of the Technical Service. Where fabrics are assembled together, these shall be tested as a composite."

II. Justification

A. Toxicology

1. Paragraph 6.1.5: In EN71-3, Category III is chosen because this category includes textile products. The amendment refers also to a test method that was not described in the current text of UN Regulation No. 44.

B. Flammability

2. Paragraph 6.1.6: The objective of the amendment is to clearly reference relevant section of EN 71 with its latest version (2014) and related test method, and to provide a limit in terms of maximum burning rate. In EN 71-2, the test method of 5.4 is dedicated to products similar to child restraint systems.