#### Proposal for collective amendments to Regulation Nos. 44 and 129

The text reproduced below was prepared by the expert from Japan for further discussion on burning rate of built-in CRS regarding proposals submitted by CLEPA (ECE/TRANS/WP.29/GRSP/2016/3, ECE/TRANS/WP.29/GRSP/2016/5, and ECE/TRANS/WP.29/GRSP/2016/6). The modification to the text is marked in bold for new or strikethrough for deleted characters.

## I. Proposal for Supplement 12 to the 04 series of amendments to Regulation No. 44 (Child Restraint Systems)

Paragraph 6.1.6., amend to read

6.1.6. The flammability of Child Restraint Systems submitted for approval shall be assessed by one of the following methods:

Method 1 ....

Method 2

The applicant shall declare in writing that when testing materials in accordance with Annex 24 of this regulation, the materials used shall not burn, nor transmit a flame front across its surface, at a rate of more than [250 100mm] per minute. Each material used in a child restraint system shall conform to these requirements. However, the requirement concerning transmission of a flame front shall not apply to a surface created by cutting a test specimen for purposes of testing pursuant to Annex 24.

# II. Proposal for Supplement 05 to Regulation No. 129 (Enhanced Child Restraint Systems)

Paragraphs 6.3.1.2., amend to read

6.3.1.2. The flammability of Child Restraint Systems submitted for approval shall be assessed by one of the following methods:

Method 1 ...

Method 2

The applicant shall declare in writing that when testing materials in accordance with Annex 23 of this regulation, the materials used shall not burn, nor transmit a flame front across its surface, at a rate of more than [250100mm] per minute. Each material used in a child restraint system shall conform to these requirements. However, the requirement concerning transmission of a flame front shall not apply to a surface

created by cutting a test specimen for purposes of testing pursuant to Annex 23.

### III. Proposal for supplement 1 to the 01 series of amendments to Regulation

No. 129 (Enhanced Child Restraint Systems)

Paragraphs 6.3.1.2., amend to read

6.3.1.2. The flammability of Child Restraint Systems submitted for approval shall be assessed by one of the following methods:

Method 1 ....

Method 2

The applicant shall declare in writing that when testing materials in accordance with Annex 23 of this regulation, the materials used shall not burn, nor transmit a flame front across its surface, at a rate of more than [250100mm] per minute. Each material used in a child restraint system shall conform to these requirements. However, the requirement concerning transmission of a flame front shall not apply to a surface created by cutting a test specimen for purposes of testing pursuant to Annex 23.

#### IV. Justification

Although these flammability test procedures for built-in CRSs are quoted from FMVSS 302, the criterion [250mm] is more relaxing than that of FMVSS. As this type of CRS is incorporated in the vehicle and thus should be deemed as part of the vehicle, the standard equivalent to that of FMVSS 302, i.e., 100 mm, is more appropriate.