

Transmitted by the experts from European  
Commission and Germany.

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DRAFT PROPOSAL FOR SUPPLEMENT 04 TO 04 SERIES OF AMENDMENTS  
OF REGULATION No. 44  
(Child restraints)

Note: The text reproduced below was prepared by the expert from Germany on behalf of the Technical Services Group (TSG) on Regulation No. 44 in order to clarify the provisions of Annex 16 to the Regulation with regard to the conformity of production procedure and by the expert from European Commission in order to restrict the use of non-integral child restraint systems to certain mass groups of CRS. It refers to ECE/TRANS/WP.29/GRSP/2006/17 and document without a symbol (informal document No. GRSP-40-15), distributed during the fortieth session of GRSP.

A. PROPOSAL

Paragraph 2.26.1., amend to read:

"2.26.1. ... restrain the child directly. ~~When supplied with group I restraints, the device allows compliance with paragraph 6.2.9."~~

~~Paragraph 4.3., amend to read:~~

~~"4.3. ... when the device is installed forward facing **or laterally facing** shall be red and..."~~

**Section 6. General specifications:**

(a) in the table 'Possible configurations for approval groups/categories', replace the sixth row in the body of the table by the following:

<u>'Forward facing (non-integral)</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
<u>'Forward facing (non-integral – see point 6.1.12.)</u>	<u>A</u>	<u>NA</u>	<u>A</u>	<u>A</u>	<u>A</u>	<u>NA</u>	<u>A</u>	<u>A</u>

(b) add two new paragraphs 6.1.11.and 6.1.12, to read:

'6.1.11. Child restraint systems of groups 0 and 0 +, with the exception of carry cots as defined in paragraph 2.4.1., shall belong to the integral class.

6.1.12. Child restraint systems of group I shall belong to the integral class unless they are fitted with an impact shield as defined in paragraph 2.7.'

**Section 17. Transitional provisions:**

add two new paragraphs 17.14. and 17.15., to read:

'17.14. As from six months from the date of entry into force of Supplement 04 to the 04 series of Amendments approvals granted in accordance with the 03 or 04 series of amendments for child restraint systems belonging to groups 0, 0+ and I which do not comply with paragraph 6.1.11. or 6.1.12. shall cease to be valid.'

17.15. From the date of entry into force of Supplement 4 to the 04 series of Amendments of this Regulation, by way of derogation to the obligations of Contracting Parties during the transitional period set out in paragraph 17.14. and based on the declaration made by the European Community at the time of its accession to the 1958 Agreement (Depositary Notification C.N.60.1998.TREATIES-28), member states of the European Community may prohibit the placing on the market of child restraint systems which do not meet the requirements of Supplement 4 to the 04 series of Amendments of this Regulation.

Paragraph 6.2.9., amend to read:

"6.2.9. ... after the child has been installed; **for this purpose the requirements of paragraph 7.2.5. (lock-off devices) shall be fulfilled**; any device that ..."

Annex 15, note to paragraph 6.1.8., amend to read:

"6.1.8. The 150 mm requirement also applies to carry cots, ~~except if a special device is used to link the carry cot and the safety belt.~~"

Annex 16, paragraph 2.2.1.4., the note, amend to read:

"Note

MH signifies harder configuration (the least ...)

LH signifies a less hard configuration (~~the best results obtained in approval or extension of approval~~)

This dual sampling ..."

## B. JUSTIFICATION

Recent campaigns of testing performed under request from consumer protection agencies have shown that the current text of Regulation 44 allows the same child seat belonging to the universal and semi-universal categories to be approved simultaneously for mass groups I, II and III without it being of the integral class.

In the seats concerned, the child is restrained directly by means of the safety belt provided for the adult occupant. Such a design does not allow babies and small children between 9 and 18 kg (mass group I - i.e. aged between about 6 months and 3 ½ years) to be secured safely. Nor does it prevent the safety belt from coming into contact with the weakest parts of the child's body.

Therefore type-approval for such non-integral child seats should be restricted to mass groups II and III only. Approvals already granted in accordance with the 'previous' legislation should cease to be valid after a reasonable period of time.

It must be reminded that Point 6.1.10. makes provisions for child seats of mass group 0 and 0+ (up to **13** kg) to be used only in a rearwards facing position. From a practical point of view such seats have to be of the integral class. It is therefore proposed, with a view to providing the optimum protection to all babies and small children under **18** kg (3 ½ years) that all child seats intended for these small children belong to the integral class.

Two exceptions are provided: one for carry cots and one for non-integral child restraint systems fitted with an impact shield.

Regulation 44 should therefore be amended as suggested above.

Ad paragraph 2.26.1.:

The deleted part of this paragraph refers to paragraph 6.2.9. thus establishing a requirement in the paragraph 2 of definitions. With the respective amendment of paragraph 6.2.9. the reference in paragraph 2.26.1. is superfluous and can be deleted.

Ad paragraph 4.3.:

~~The colour coding for forward and rearward facing child restraints has to be accomplished by laterally facing to offer colour coding also for carry cots.~~

Ad paragraph 6.2.9.:

Because of different interpretations of this paragraph the insertion makes clear that the requirements of a lock-off device have to be fulfilled.

Annex 15

Ad note to paragraph 6.1.8.:

The second part of the note can be misunderstood in the sense that it offers the category universal to carry cots of the respective construction.

Annex 16

Ad paragraph 2.2.1.4., the note:

The configurations MH (more hard) and LH (less hard) during COP-testing are often difficult to differentiate. So MH should be regarded as most hard and LH as a less hard.

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