Approval of a child restraint not in line with 5 paragraphs of ECE-R44/04

There was the observation on the German market that a child restraint (manufactured in Rumania and approved in Hungary) was offered to the consumer which did in a very severe manner not comply with ECE-R44/04.

It consisted of a textile part connecting the lap to the shoulder portion of an adult belt by this keeping the shoulder portion away from the neck of the child. Pictures of this product can be seen under www.fest-k.ru.

Already in 1993 the Informal Group for the 03-series of amendments to ECE-R44 regarded such a sort of product as dangerous in the sense of submarining and introduced respectively § 6.2.2 into the regulation to prevent such products. The risk of submarining was at that time already directly forbidden by § 6.2.4.

Additionally to the cases in 1993 the product in question is not only allowed for mass groups 2 and 3 but also for mass group 1 (9 to 18 kg, 9 months to 4 years). Via this group 1 the product vulnerates additionally the 3 §'s 6.1.12, 6.2.1.4 and 6.2.9.

GRSP is asked to support an urgent claim to the respective approval authority to withdraw this approval as early as possible.