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World Forum for Harmonization of Vehicle Regulations  
Working Party on Passive Safety  
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Item 13 of the provisional agenda  
Regulation No. 44 (Child Restraints Systems)

Proposal for draft Supplement 5 to the 04 series of amendments to Regulation No. 44

Submitted by the expert from Spain *

The text reproduced below was prepared by the expert from Spain on behalf of the Technical Services Group (TSG) on Regulation No. 44. It is aimed at improving the requirements of qualification of production of child restraints systems. The modifications to the current text of Regulation are marked in bold for new or strikethrough for deleted characters.

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* In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/2010/8, 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

Insert a new paragraph 10.1.3., to read:

"10.1.3. If a further test report is required, compare the horizontal head excursion result with the worst case from all results previously recorded:

(b) If the excursion is greater, then new production qualification testing must be carried out

(c) If the excursion is less, production qualification tests do not need to be carried out."

Paragraph 11.2., amend to read:

"11.2. Qualifying the production of child restraint systems.

The production of each new approved type of child restraint system of categories "universal", "semi-universal", and "restricted" must be subjected to production qualification tests. Additional qualification of production may be prescribed following paragraph 10.1.3.

..."

II. Justification

1. Qualification of production was introduced into Regulation No. 44 to verify first of all, whether the manufacturer was able to guarantee consistency of results between the type approved prototype and the produced one. The objective of this qualification is also to check that the natural spread of production is under control. This is done with a statistical analysis conducted on a series of results and checked with the Regulation requirements.

2. There is no clear indication on how to proceed with a new qualification of production following a product modification (extension of approval). It is considered that in certain case, a new qualification of production test has to be demanded. This case occurs when during an extension of approval, the original approval limits considered in paragraph 11.2.1. are exceeded.

3. Explanatory examples follow:

(a) Original approval 500 mm; first extension 490 mm; second extension 495 mm. Last result below worst case 500 then no need for production qualification.

(b) Original approval 500 mm; first extension 510 mm; production qualification is needed; second extension 505 mm = no need for production qualification.