CLEPA analysis
Future i-Size approval possibilities

FOR GRSP CONSIDERATION
15 May 2013.
5.2 “A type of Child Restraint System approved according to this regulation shall not bear another approval mark according to R44.”

Questions:
• How should “type” be interpreted?
• Does this mean that one CRS, identical in shape, form and name, shall not bear both an R44 and i-Size label?
• How different should 2 CRS be, to be allowed to have differs in size, form or name between them?
Dual approval

Not Possible

1 seat, containing 2 labels on the same physical product.

Definition: To identify this situation, it’s enough to have 1 product at hand
Separate Approval

Name = ABC
• A seat meeting all req’s of i-Size

Name = XYZ
• A seat meeting all req’s of R44

Possible

Seats are different by name.
Definition: To identify this situation, you need to buy 2 products.

2 physically similar seats!
Current situation in the market: Infant Carriers

Since 30 years a solution has been developed for global transportation of babies: **The travel system**.

A system allowing the fluent transportation of a baby from home to pushchairs and to the car.
Stroller often the driver to the infant carrier purchase

This system includes a belted infant carrier, a stroller and a base which facilitates installation in cars.

The introduction of isofix bases represents an improvement for ease of use.
However flexibility is still needed by consumers: installation of shell only; installation of shell on base.
i-Size Possibilities

2 possibilities of infant carrier + base.

1. R44 infant carrier + base = i-Size
2. Infant carrier + base = i-Size
• A babyshell is quite different compared to a babyshell + base. (looks, mass, volume etc)

• It should be classified as a different “type” in the i-Size definition.
1. i-Size containing an R44 element

Meets all i-Size criteria

2. i-Size

No homologation

Meets all i-Size criteria
Expected misuse; Infant Carrier w.o. any attachment provision

I-Size Infant Carrier with creative belt installation. Eg., this is dangerous!
Consequences & Proposed Solution

- Scenario 1 allows possibility to integrate infant carriers within i-Size (mitigating the risks) and will continue, with the removal of R44 and the introduction of belted products in Reg 1XX.
- Scenario 2 may have the following consequences:
  - Possibility to introduce, in an i-Size system with base, an infant carrier not homologated without belt routing (no labelling), with an important risk of Misuse
  - Manufacturer won’t use i-Size Reg with infant carrier on an isofix base
  - With removal of isofix from R44 and removal of belts from Reg 1XX, no more isofix base for infant carrier.
Consequences & Proposed Solution

Proposed Scenario 1 as the solution

Expectation : GRSP opinion and guidance on proposed solution