Regulation 129
CLEPA response to 2017-61-28

Informal document GRSP-61-33
(61st GRSP, 08-12 May 2017
agenda item 17)
IMPROVEMENTS TO THE USABILITY OF ECRS

There have been many reports of the shortcomings of Reg.44 CRSs in the field.

The Informal Group developing Reg.129 has listened to the issues and made many changes to the way ECRSs are designed and labelled.

Reg.129 ECRSs have not been in the field for long, and have yet to prove themselves.
COMBINING TYPES IN REGULATION 129

Text from 02 Series of R129 already adopted by WP29, coming into force this summer

3.2.2. The applicant shall indicate the kind of application:
(a) Application for an i-Size Enhanced Child Restraint Systems; or
(b) Application for a specific vehicle ISOFIX; or
(c) Application for a i-Size booster seat Enhanced Child Restraint System; or
(d) Application for a specific vehicle booster seat Enhanced Child Restraint System;
(g) Or any combination of (a),(b),(c) and (d) as long as they fulfil paragraphs 5.4.2.2. and 6.1.3.3.
Meaning of **WP29 already adopted** text “(g) Or any combination of (a),(b),(c) and (d).”

Allows the combinations any of the following types:

1. ISOFIX attached forward facing integral systems
2. ISOFIX attached rearward facing integral systems
3. ISOFIX and belt attached non-integral booster seat (with back)
4. Belt only attached non-integral booster seat (with back)

**Combinations of the above are already being developed ready to approve this year when the adopted text comes into force.**
## Combining Integral and non-integral

<table>
<thead>
<tr>
<th>R44 CRS</th>
<th>R129 ECRS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harness is taken out and potential not to be replaced for the second hand user.</td>
<td>No possibility to detach without specific tools, any components not designed to be detached for change of configuration.</td>
</tr>
<tr>
<td>Harness allowed to be taken out and rethreaded to adjust to fit the child. Potential for misthreading of the harness.</td>
<td>Items designed to be detached shall be designed to avoid risk of incorrect assembly and use.</td>
</tr>
<tr>
<td>Any harness belt shall be capable of its full range of adjustment without disassembly.</td>
<td></td>
</tr>
</tbody>
</table>
## Combining Integral and non-integral

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<thead>
<tr>
<th>R44 CRS</th>
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<tbody>
<tr>
<td>Children in R44 allowed to use a booster seat or a booster cushion too soon, from a mass of 15kg.</td>
<td>Integral harness height increased to fit 95th percentile child torso of child up to 100cm height.</td>
</tr>
<tr>
<td>(NB. For booster cushions R44 has a recent new minimum height limit of 125cm)</td>
<td>Prohibited use, of booster seats with a back, below child height of 100cm.</td>
</tr>
<tr>
<td></td>
<td>Increased internal space requirement of booster seat with a back.</td>
</tr>
<tr>
<td></td>
<td>(NB. Future requirements for Booster cushions in R129 should follow the recent change in R44, minimum height of 125cm)</td>
</tr>
</tbody>
</table>
### Combining Integral FF and Integral RF

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<tbody>
<tr>
<td>Misused systems typically with poor labelling of belt routing.</td>
<td>Modules allowed to be clipped into an ISOFIX attached base.</td>
</tr>
<tr>
<td></td>
<td>(NB. For phase 3, improvements made to labelling of belt routing including identification of lap/diagonal belt. To address current shortcomings in R44)</td>
</tr>
</tbody>
</table>
## Combining Integral FF and Integral RF

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<tr>
<td>Children move from RF to FF too soon.</td>
<td>Children stay RF for longer</td>
</tr>
<tr>
<td>Rear facing R44 products are too small.</td>
<td>R129: Min Internal space requirement and harness height increased to fit 95th percentile child torso of child up to at least 83cm height</td>
</tr>
<tr>
<td>R44 allows children to use FF CRSs at 9kg.</td>
<td>R129 prohibits the use of FF ECRSs before 15 Months of age</td>
</tr>
</tbody>
</table>
ADRESSING MISUSE IN THE 03 SERIES OF AMENDMENTS TO REG 129

The informal group has responded to reported misuse with R44 products by requiring:

Improved marking for belt attached restraints

Fitting labels
  - min dimension requirement
  - required on both sides of ECRS
  - visible in correct orientation relative to the vehicle.

Impact shields to be clearly labelled
THE 03 SERIES OF AMENDMENTS TO REG 129

All belt path colouring on product
at least the width of the adult belt (no spots or flag labels allowed!)

Additional labels required (of min dimensions)
indicate which part of the adult belt goes into a belt path

A
B
C

Belt routing icon to be used on or near belt guiders
Belt routing icon to be used on installation label
CONCERNS

Changes to R129 are being suggested “late in the day”

Creates an unreasonable burden on industry

Disallowing the combinations of “types” puts a large financial burden on the consumer

There is no evidence base relating to R129 products to support these late changes

The issues in the field are with R44 products, not R129 products.

The current improvements to R129 products should be realised before adding more restrictions

Changes in the direction of R129 should be supported by a cost benefit analysis.
Paragraph 3.2.2., amend to read:

"3.2.2. The applicant shall indicate the kind of application:
(a) Application for an i-Size Enhanced Child Restraint Systems; or
(b) Application for a specific vehicle ISOFIX; or
(c) Application for a i-Size booster seat Enhanced Child Restraint System; or
(d) Application for a specific vehicle booster seat Enhanced Child Restraint System; or
(e) Or any combination of (a), (b), (c) and (d) as long as they fulfil paragraphs 5.4.2.2. and 6.1.3.3.
(f) Application for a Universal belted Enhanced Child Restraint Systems; or
(g) Application for Specific vehicle belted Enhanced Child Restraint Systems; or
(h) Or any combinations of (c), (d), (e) and (f) as long as they fulfil paragraph 5.4.2.2. and 6.1.3.3."