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World Forum for Harmonization of Vehicle Regulations
Working Party on Passive Safety
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Item 19 of the provisional agenda
UN Regulation No. 129 (Enhanced Child Restraint Systems)

Proposal for Supplement 2 to the 03 series of amendments to UN Regulation No. 129

Submitted by the expert from CLEPA - European Association of Automotive Suppliers*

The text reproduced below was prepared by the expert the European Association of Automotive Suppliers (CLEPA), to clarify the definition of an "infant carrier" and to amend the transitional provisions following the adoption of the new "General Guidelines for United Nations regulatory procedures and transitional provisions in UN Regulations" (see ECE/TRANS/WP.29/29/1044/Rev.2). It is based on the informal documents GRSP-63-27 and GRSP-63-30 discussed during the sixty-third session of the Working Party on General Safety (GRSP), with the addition of a correction needed for paragraph 16.11. The modifications to the current text of UN Regulation No. 129 are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2014–2018 (ECE/TRANS/240, para. 105 and ECE/TRANS/2014/26, programme activity 02.4), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.
I. Proposal

Paragraph 2.26., amend to read:

"2.26. "Infant carrier" means an Integral Enhanced Child Restraint System that restrains a child up to 15 months old and up to 83 cm stature intended to accommodate the child in a rearward-facing semi-recumbent position. It is so designed as to distribute the restraining forces over the child's head and body excluding its limbs in the event of a frontal collision. It is designed to be removed from the vehicle with the child inside, and without opening any harness, and to be carried outside of the vehicle."

Paragraph 16.11., amend to read:

"16.11. Notwithstanding paragraphs 16.9 and 16.10, Contracting Parties applying the UN Regulation shall continue to accept, and grant extensions to, UN type-approvals issued according to the preceding series of amendments to the UN Regulation, for the vehicles/vehicle systems Enhanced Child Restraint Systems which are not affected by the changes introduced by the 03 series of amendments."

Insert a new paragraph 16.12., to read:

"16.12. Until 1 September 2024, Contracting Parties applying this UN Regulation shall continue to grant extensions of approvals to the 02 series of amendments to this UN Regulation."

II. Justification

1. The definition of infant carrier introduced in the 03 series of amendments to UN Regulation No. 129 describes the appearance and function of infant carriers, but also specifies limits on their use (children up to 15 months only) and type-approval (up to 83 cm stature). This is potentially in conflict with the present stature requirements in paragraph 6.1.2.3 of the regulation. It is also inconsistent with the aim of keeping children rear-facing for as long as possible.

2. Children can receive very good protection from an infant carrier above the age of 15 months (provided they fall within the stature range of the CRS). Furthermore, it is feasible to design an infant carrier that complies with the internal and external dimensions for statures greater than 83 cm. It is proposed to remove this part of the definition.

The new guidelines on regulatory procedures and transitional provisions adopted by 174 WP.29, November 2017 session (see ECE/TRANS/WP.29/1044/Rev.2), foresee that …

Paragraph 26. ... The new series of amendments may contain a provision on the conditions for granting extensions to existing approvals ....

3. Regulation 129 series 03 allows extensions of approvals to the original version of the Regulation (see para. 16.4) and to the 01 series of amendments (see para. 16.7), but not for the 02 series.

4. It is therefore necessary to explicitly allow granting extensions for type approvals under 02 series of amendments (new para. 16.12) and for any approval not affected by 03 series of amendments (amended para. 16.11).
5. Paragraph 16.11. refers to vehicle approval, but UN Regulation No.129 does not concern vehicle approval, therefore it is necessary to correct this inconsistency and insert reference to the approval of "Enhanced Child Restraint Systems".