

Proposal for a Supplement 2 to the 03 series of amendments to UN Regulation No. 129 (Enhanced child restraint systems)

Submitted by the expert from the Netherlands

The text reproduced below was prepared by the expert from the Netherlands, aiming to achieve a proper legalized use of not permanently fixed inserts in UN Regulation No. 129. The modifications to the current text of the UN Regulation are marked in bold for new or strikethrough for deleted characters.

I. Proposal

Insert a new paragraph 2.6.2., to read:

"2.62. "Insert" means a part of an ECRS that provides additional support to a child and is an essential means to comply with all requirements for the entire or a part of the declared stature range."

Paragraph 4.10., amend to read:

4.10. "Any removable insert , shall have a permanently attached label to indicate the brand, model and size range of the Enhanced Child Restraint System to which it belongs. The minimum size of the label shall be 40 x 40 mm or the equivalent area."

Paragraph 4.10. (former), renumber as paragraph 4.11.

Paragraph 6.2.1.1., amend to read:

"6.2.1.1. The restraint of the child shall give the required protection in any position specified for the Enhanced Child Restraint System;

Inserts shall form only one layer on the seat surface. This does not preclude the use of additional 'comfort' inserts, provided they are not needed to comply with the requirements of the regulation.

For "Special Needs Restraints" the primary means of restraint shall give the required protection in any intended position of the Enhanced Child Restraint System without the use of the additional restraining devices which may be present;"

II. Justification

1. Inserts are essential in case of Enhanced Child Restraint Systems (ECRS) having a wider declared size range, because they play a decisive role in fulfilling the requirements concerning a.o. internal geometric measurements, impact tests and the overturning test.
2. Inserts that are removable and unidentified, can easily be the cause of misuse and in the worst case lead to a child becoming a flying object during an impact.

3. A declared size range marked only on the outer shell of a ECRS with removable inserts can lead to misuse. Therefore, in terms of general product safety for consumers the right information on the appropriate insert will help to prevent not intended use by the consumer and it will also help when ordering lost (or worn out) inserts.
4. This problem is already acknowledged where it concerns impact shields that are not permanently attached. Therefore, this proposal is to treat removable inserts in the same way; both the identification and the stature range will be solved.
5. Finally, the rule of no accumulation (no insert in an insert, no sarcophagus constructions) is in line with the principle of only one belt routing; a mix of a different inserts at the same time would complicate matters. Also, inserts are not subject to any durability testing (this in contrary to other parts that contribute to restraining capacities), sarcophagus constructions could lead to a too great dependency of inserts.
