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**Economic Commission for Europe****Inland Transport Committee****World Forum for Harmonization of Vehicle Regulations****Working Party on Passive Safety Provisions****Sixty-eighth session**

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Item 12 of the provisional agenda

**UN Regulation No. 129 (Enhanced Child Restraint Systems)****Proposal for Supplement 5 to the 03 series of amendments to  
UN Regulation No. 129 (Enhanced Child Restraint Systems)****Submitted by the experts from the European Association of Automotive  
Suppliers and Japan\***

The text reproduced below was prepared by the experts from the European Association of Automotive Suppliers (CLEPA) and Japan to clarify aspects of UN Regulation No. 129. It is based on ECE/TRANS/WP.29/GRSP/2020/3 and GRSP-67-16, distributed at the sixty-seventh session of the Working Party on Passive Safety (GRSP)(see ECE/TRANS/WP.29/GRSP/67, para. 22). This proposal focuses only on the digital user guide that was introduced with GRSP-66-11 distributed at the sixty-sixth session of GRSP. It includes additional modifications following discussions between CLEPA and Japan and feedback received from Contracting Parties to the 1958 Agreement. The modifications to the current text of the UN 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 2020 as outlined in proposed programme budget for 2020 (A/74/6 (part V sect. 20) para 20.37), 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

Insert new paragraph 4.14., to read:

"4.14. **For Enhanced Child Restraint Systems which do not provide a paper form of the user instructions to the customer, either a weblink or QR code to the user instructions shall be permanently attached to the Enhanced Child Restraint System and visible to the person installing the Enhanced Child Restraint System in the vehicle.**"

Paragraph 14.1., amend to read:

"14.1. Each Enhanced Child Restraint System shall be accompanied by ~~instructions in the language of the country where the device is sold with the following content:~~ **information for its use. The information can be provided to the user, either:**

- (a) **In a paper form fulfilling requirements 14.2. and 14.3. or**
- (b) **In a digital form fulfilling requirements 14.2., 14.3. and 14.4."**

Paragraph 14.2.to 14.2.11., amend to read:

"14.2. ~~Instructions on installation shall include the following points:~~

**The following information shall be provided in the language of the country where the device is sold:**

14.2.1. For i-Size category Enhanced Child Restraint Systems the following label shall be clearly visible on the exterior of the packing:

*Notice*

This is an i-Size Enhanced Child Restraint System. It is approved according to UN Regulation No.129, for use in, i-Size compatible vehicle seating positions as indicated by vehicle manufacturers in the vehicle users' manual.

If in doubt, consult either the Enhanced Child Restraint System manufacturer or the retailer.

14.2.2. For i-Size booster seat category Enhanced Child Restraint Systems the following label shall be clearly visible on the exterior of the packing:

*Notice*

This is an i-Size booster seat Enhanced Child Restraint System. It is approved according to UN Regulation No. 129, for use primarily in "i-Size seating positions" as indicated by vehicle manufacturers in the vehicle user's manual.

If in doubt, consult either the Enhanced Child Restraint System manufacturer or the retailer.

14.2.3. For Universal booster cushion category Enhanced Child Restraint Systems, the following label shall be clearly visible on the exterior of the packing:

*Notice*

This is a Universal booster cushion Enhanced Child Restraint System. It is approved according to UN Regulation No.129, for use in i-Size compatible and universal vehicle seating positions as indicated by vehicle manufacturer in the vehicle user's manual.

If in doubt, consult the Enhanced Child Restraint System manufacturer or the retailer.

- 14.2.4. For Universal Belted seat category Enhanced Child Restraint Systems the following label shall be clearly visible on the exterior of the packing:

*Notice*

This is a Universal Belted Enhanced Child Restraint System. It is approved according to UN Regulation No. 129, for use primarily in "Universal seating positions" as indicated by vehicle manufacturers in the vehicle user's manual.

If in doubt, consult either the Enhanced Child Restraint System manufacturer or the retailer.

- 14.2.5. For Specific vehicle category Enhanced Child Restraint Systems, information on the applicable vehicle, in at least a physical version, shall be clearly visible at the point of sale without removing the Enhanced Child Restraint System from its packing;
- 14.2.6. The Enhanced Child Restraint manufacturer shall provide information on the exterior packaging as to the address in a physical or a digital version to which the customer can write to obtain further information on fitting the Enhanced Child Restraint in specific cars;
- ~~14.2.7. The method of installation illustrated by photographs and/or very clear drawings;~~
- ~~14.2.8. The user shall be advised that the rigid items and plastic parts of a Enhanced Child Restraint System shall be so located and installed that they are not liable, during everyday use of the vehicle, to become trapped by a movable seat or in a door of the vehicle;~~
- ~~14.2.9. The user should be advised to use carry-cots perpendicular to the longitudinal axis of the vehicle;~~
- 14.2.407. In the case of rearward facing Enhanced Child Restraint Systems the customer shall be advised not to use them in seating positions where there is an active frontal airbag installed. This information shall be clearly visible at the point of sale without removing the packaging;
- 14.2.448. For "Special Needs Restraints" Enhanced Child Restraint Systems the following information shall be clearly visible at the point of sale without removing the Enhanced Child Restraint System from its packing:

This "Special Needs Restraint" is designed to give extra support to children who have difficulty sitting correctly in conventional seats. Always consult your doctor to make sure that this restraint system is suitable for your child.

*Insert new paragraphs 14.2.9. and 14.2.10., to read:*

- "14.2.9. For integral forward facing Enhanced Child Restraint Systems, the following information shall be clearly visible on the exterior of the packing:**

**"IMPORTANT - DO NOT USE BEFORE THE CHILD'S AGE EXCEEDS 15 MONTHS (Refer to instructions)".**

- 14.2.10. For integral Enhanced Child Restraint Systems that can be used forward and rearward facing, the following information shall be clearly visible on the exterior of the packing:**

**"IMPORTANT – DO NOT USE FORWARD FACING BEFORE THE CHILD'S AGE EXCEEDS 15 MONTHS (Refer to instructions)".**

Insert new paragraph 14.2.11., to read:

- "14.2.11. For Enhanced Child Restraint Systems which do not provide a paper form of the user instructions with the Enhanced Child Restraint System the following information shall be clearly visible on the exterior of the packing:

**"IMPORTANT – A PHYSICAL PAPER USER GUIDE IS NOT INCLUDED WITH THIS PRODUCT.**  
**THE USER GUIDE CAN BE FOUND BY FOLLOWING THE QR CODE\***  
**THE USER GUIDE CAN BE FOUND BY FOLLOWING THIS WEBLINK XXXXXX\***

**\*Delete as appropriate "**

Paragraphs 14.3. to 14.3.3., amend to read:

- "14.3. The instructions for use shall include the following points **and be available in the language of the country where the device is sold:**
- 14.3.1. The "Size range" **for each configuration** and for integral Enhanced Child Restraint System the maximum occupant mass for which the device is intended;
- 14.3.2. The method of use shall be shown by photographs and/or very clear drawings. In the case of seats that can be used both forward and rearward facing, clear warning shall be given to keep the Enhanced Child Restraint System rearward facing until the child's age is greater than a stated limit, or some other dimensional criterion is exceeded;
- ~~14.3.3. For integral forward facing Enhanced Child Restraint Systems, the following information shall be clearly visible on the exterior of the packing:~~

~~"IMPORTANT – DO NOT USE BEFORE THE CHILD'S AGE EXCEEDS 15 MONTHS (Refer to instruction)".~~

~~For integral Enhanced Child Restraint Systems that can be used forward and rearward facing, the following information shall be clearly visible on the exterior of the packing:~~

~~"IMPORTANT – DO NOT USE FORWARD FACING BEFORE THE CHILD'S AGE EXCEEDS 15 MONTHS (Refer to instruction)".~~

"

Insert new paragraphs 14.3.3. to 14.3.5., to read:

- "14.3.3. The method of installation shall be illustrated by photographs and/or very clear drawings;
- 14.3.4. The user shall be informed that the rigid items and plastic parts of an Enhanced Child Restraint System shall be located and installed so that they are not liable to become trapped by a movable seat or in a door of the vehicle during everyday use of the vehicle;
- 14.3.5. The user shall be advised to use carry-cots perpendicular to the longitudinal axis of the vehicle;"

Paragraph 14.3.4. to 14.3.15., amend to read:

- "14.3.46. The operation of the buckle and adjusting devices shall be explained clearly;
- 14.3.57. It shall be recommended that any straps holding the restraint to the vehicle should be tight, that any support-leg should be in contact with the vehicle floor,

that any straps or impact shields restraining the child should be adjusted to the child's body, and that straps should not be twisted;

- 14.3.68. The importance of ensuring that any lap strap is worn low down, and that any impact shield installed properly, so that the pelvis is firmly engaged, shall be stressed;
- 14.3.79. It shall be recommended that the device should be replaced when it has been subject to violent stresses in an accident;
- 14.3.810. Instructions for cleaning shall be given;
- 14.3.911. A general warning shall be given to the user concerning the danger of making any alterations or additions to the device without the approval of the Type Approval Authority, and a danger of not following closely the installation instructions provided by the child restraint manufacturer;
- 14.3.4012. When the chair is not provided with a textile cover, it shall be recommended that the chair should be kept away from sunlight, otherwise it may be too hot for the child's skin;
- 14.3.4413. It shall be recommended that children are not left in their Enhanced Child Restraint System unattended;
- 14.3.4214. It shall be recommended that any luggage or other objects liable to cause injuries in the event of a collision shall be properly secured.
- 14.3.4315. It shall be recommended that:
- 14.3.4315.1. The Enhanced Child Restraint System shall not be used without the cover;
- 14.3.4315.2. The Enhanced Child Restraint System cover should not be replaced with any other than the one recommended by the manufacturer, because the cover constitutes an integral part of the restraint performance.
- 14.3.4416. There shall be provisions made so that the instructions can be retained on the child restraint for its life period or in the vehicle handbook in the case of built-in restraints.
- 14.3.4517. For an "i-Size Enhanced Child Restraint System", the user shall also be referred to the vehicle manufacturer's handbook."

*Insert new paragraphs 14.4. to 14.4.6., to read:*

**"14.4. Quick-start guide**

**The Enhanced Child Restraint System shall be accompanied with a physical "quick-start guide" in a paper form written in the language of the country where the device is sold, that includes the following information as a minimum:**

- 14.4.1. **The "Size range" for each configuration, and for integral Enhanced Child Restraint Systems, the maximum occupant mass for which the device is intended;**
- 14.4.2. **A weblink or QR code with the product to where a digital version of the information detailed in paragraph 14.3. can be found. The website linked from the weblink or QR code shall be written in the language of the country where the ECRS is sold or, on the top page of the website, a language selection shall be available. The digital version shall be edited in a printable format;**
- 14.4.3. **Contact details for the customer to request a printed paper version of the full user instructions from the Enhanced Child Restraint System manufacturer. The CRS manufacturer shall ensure a printed paper version is available over the lifetime of the product;**
- 14.4.4. **For specific vehicle categories of Enhanced Child Restraint Systems, information on the applicable vehicle(s), in a weblink or QR code. This**

**information may be provided in the same weblink or QR code as that required by 14.4.2.;**

**14.4.5. The address to which the customer can write to obtain further information on fitting the Enhanced Child Restraint System in specific cars. The digital version shall be edited in a printable format;**

**14.4.6. If the instructions are provided in a digital form, a quick-start guide that complies with paragraph 14.4. can be retained on the child restraint for its life period."**

## **II. Justification**

1. Protection of the environment requires reducing the amount of paper and waste. The amount of paper used for a multi-lingual user guide can easily exceed hundreds of tonnes per year. This proposal reduces the amount of paper that is required for a paper version of child restraint system (CRS) user instructions. It means that a manufacturer can choose to provide the user with a digital form of the bulk of the instructions. The consumer may request a physical version of the user instructions if they cannot access the digital version of the user instructions.

2. Consumers already prefer to use additionally offered videos from CRS manufacturers or third parties rather than the officially printed user guide. The reason is that the information for use contains variants of installation and operating instructions and also because the printed version with its limited space does not allow to include interactive means that could help the user further.

3. Providing digital information will improve consumer experience. Positive results have already been seen, for example, in other consumer product segments.

4. On the other hand, there exist users whose digital environment is not well developed. This proposal takes those users into consideration as well.

5. A decisive advantage for reducing the risk of operating errors is the ability to provide the end consumer with a digital information that can be used to guide him or her in a targeted manner and to offer interactive assistance in the event of a lack of understanding.

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