



Belt Guides in UN Regulation 44 and in Realistic Test Environment

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Belt Guides in UN Regulation 44

- Regulation 44 is intended to forbid CRS in the form of belt guides, irrespective of the results of the crash test
- This requirement has not stopped manufacturers from seeking type-approval for a belt guide
- At least one has succeeded in placing a R44 approved product on the market
- Type approval was granted on the basis crash test results only, ignoring several additional requirements

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Belt Guides in UN Regulation 44



Two concerns:

- Children are put at risk of serious injury (or worse) when using belt guides / straps as standalone CRS
- Test Approval Authorities selecting what they consider relevant for granting approvals is wrong and detrimental for the type approval system.

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Belt Guides in Realistic Test Environment



Test specs as per ETC (a.k.a. ADAC / StiWa):

- VW Polo car body
- Q6 Dummy w/wo Smart Kid Belt
- Euro NCAP pulse




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Belt Guides in Realistic Test Environment



Guide Strap



Seat Belt Only




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Belt Guides in Realistic Test Environment



Guide Strap



Seat Belt Only




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Belt Guides in Realistic Test Environment



		Q6 with seatbelt only	Q6 with smart kid belt
Head	a_{res} [g]	91,5	92,7
	HIC ₃₆	1197	1395
Neck	F_{res} [N]	3508	3558
	M_{res} [Nm]	74,3	79,1
Chest	a_{res} [g]	62,7	72,8
Abdomen	visual observation	penetrated by the seatbelt	penetrated by the seatbelt
Pelvis	a_{res} [g]	51,1	56,9

Summing up:

- **High risk of abdominal injuries in both cases due to severe submarining**
- "Smart Kid Belt" offers no added value compared to "seatbelt only"
- Both results demonstrate the need of using a well-designed booster seat for this age category
- **Use of Smart Kid Belt as standalone CRS must be stopped in order to ensure the safety of some of the youngest and most vulnerable of consumers**

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Belt Guides in UN Regulation 44



ANEC:

- Support the position of the Russian Federation and The Netherlands that the "Smart Kid Belt" is not in compliance with R44 requirements and that type approval should be withdrawn
- Urge GRSP to modify Regulation 44 to make even more clear that belt-guides and straps cannot not be approved as standalone CRS
- [Request recall of and refund for sold non-complying R44 approved guide straps]

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