

Supplement information on documents GRSP-50-09 (belt guide device) and GRSP-50-28

Information

France and Germany would like to inform the experts from GRSP about the belt guide device presented by CLEPA in document GRSP-50-09, to complement the information why such device can not be approved as child restraint system according to UN regulation No. 44 making reference to the corresponding paragraphs of this regulation.

As described in document GRSP-50-09 the belt guide is approved as group I, II and III child restraint system named as guide strap in the approval document. A guide strap is defined in paragraph 2.8.8. of regulation No. 44, to read:

“ ‘guide strap’ means a strap which constrains the shoulder strap of the adult seat belt in a position to suit the child and where the effective position at which the shoulder strap changes direction can be adjusted by means of a device which can be moved up and down the strap to locate the wearer’s shoulder, and then locked into that position. This guide strap is not meant to carry a significant part of the dynamic load.”

In general a guide strap is not meant to be a complete child restraint system but part of a child restraint system and therefore is not foreseen to be approved solely as child restraint system.

In spite of this being approved as child restraint systems, the following information is clarifying why the belt guide device or guide strap as presented is not in line with the current text of regulation No. 44.

An approval as group I child restraint system can not be granted for such device, which just uses the adult safety belt for restraining the child, according to regulation No. 44 paragraph 6.1.12., to read
“Child restraint systems of group I shall belong to the integral class unless they are fitted with an impact shield as defined in paragraph 2.7.”

As the belt guide device has been approved as guide strap according to paragraph 2.8.8., the exemption for an impact shield does not apply.

With regard to the group II and III child restraint system approval, the presented belt guide device can not be approved neither based on the requirements of the paragraphs of regulation No. 44 as follows:

- “6.2.2. For groups I, II and III, all restraint devices utilising a ‘lap strap’ must positively guide the ‘lap strap’ to ensure that the loads transmitted by the ‘lap strap’ are transmitted through the pelvis.”
- 6.2.3. All straps of the restraint shall be so placed that they cannot cause discomfort to the wearer in normal use or assume a dangerous configuration. The distance between the shoulder- straps in the vicinity of the neck should be at least the width of the neck of the appropriate manikin.
- 6.2.4. The assembly shall not subject weak parts of the child’s body (abdomen, crotch, etc.) to excessive stresses. The design shall be such that compression loads shall not be imposed on the crown of the child’s head in the event of a collision.”