

10th STCBC Meeting**Safer Transport of Children in Buses and Coaches**

Date: 18 & 19 May 2022

Time : 12h-14h CET

Location: Web-meeting (Zoom)

1) Welcome & Meeting Arrangements (Chair, Marta)

Marta welcomed everyone to the meeting and reminded them of the schedule for the two days.

2) Adoption of the agenda – STCBC-10-01

The Agenda was adopted with no changes.

3) Actions from last meeting**Feedback from GRSP progress report (STCBC-10-02) (Chair, Marta)**

Marta summarised the key points from the progress report presented to the 71st session of GRSP. She noted that the timeline specified in our Terms of Reference foresaw adoption of the new UN Regulation at the 72nd session of GRSP in December 2022. Although such a deadline might be possible, GRSP agreed to extend the mandate of the Group until March 2024.

Marta explained that GRSP agreed with our current approach of focussing on built-in systems in Phase 1, whilst allowing CRS type-approved to UN Regulation No.129 to be used on buses and coaches (provided that the seating position allows for their installation). She noted that explicit support for this approach was given by the Netherlands during the GRSP session.

Ronald (Consumers International) asked whether there is any feedback from GRSG. Rudolf (Germany) explained that he'd attended the 123rd session of GRSG in March 2022 where the Secretary of GRSP had presented our (old) GRSP progress report (from the 70th session). Rudolf had supplemented this with a verbal update to GRSG that explained some of our latest decisions. He added that the GRSG session report (ECE/TRANS/WP.29/GRSG/102) was not perfectly aligned with his statements; however, after reviewing the report, the Group decided not to take immediate action. Instead, Rudolf, possibly in combination with Marta, will provide clarification at the next session of GRSG.

4) Drafting the new UN Regulation - STCBC-10-03 (All)**Introduction and scope**

Marta noted that the Introduction explains that ECRS type-approved to UN Regulation No.129 can be used in buses and coaches wherever there is a three-point seat belt and/or ISOFIX. It also states that the new regulation will not specify additional requirements for UN Regulation No.129-approved ECRS. She

gave the example of other UN Regulations that include an Introduction to explain the intention of the regulation and key principles¹.

Ronald suggested that the current text is too generic and wondered whether it was clear. Marta agreed and said the Introduction would be expanded as the work on the regulation develops. Marianne (CLEPA) noted that “Enhanced” or “E” should be used when referring to CRS type-approved to UN Regulation No.129. The Group agreed.

Marta explained that the Scope was agreed at the last meeting. No further comments were raised on the Scope of the new regulation.

Definitions

Marta explained that the definitions were derived from UN Regulation No.129, with some excluded on the basis that they were unnecessary or covered elsewhere. She invited the Group to let her know if anything important was omitted. The Group then reviewed each definition, line-by-line, and agreed changes, where needed. In most cases, these comprised minor editorial clarifications and corrections; however, the following definitions generated more discussion:

- “Stand-alone”

Marta asked the Group whether a definition of stand-alone CRS was needed. Dinos (Secretary/CLEPA) noted that he suggested it in a previous meeting after the term was used several times in the discussion. The need for the definition will ultimately depend on whether the term is written into the regulation. The Group agreed to leave it in brackets, for now, to be reviewed later.

- “Child Restraint System”

Marta asked the Group for their views on the definition of a CRS. Marianne proposed that two definitions are made; one all-encompassing definition of a CRS and a separate, more limited definition of an ECRS approved to UN Regulation No.129. Luis (Spain) suggested defining a bus CRS, but Marta questioned the need for such a distinction and explained that it might be better not to distinguish between vehicle types.

Salim (OICA) asked whether a booster cushion can be used in a bus with a three year old child. Marta explained that wouldn’t be possible as booster cushions can be approved from 125 cm only. Salim questioned this approach since booster seats won’t fit in buses. Marta reminded the Group that we agreed not to focus on compatibility issues as they cannot be solved without amending both CRS and vehicle regulations, which is beyond the Terms of Reference agreed by GRSP. Victor (Spain) agreed and explained that solving all of the issues would likely take 5 years and require amendments to vehicle regulations such as UN Regulation No.107. Instead, the Group needs to focus on the issues it can solve, as agreed with GRSP.

The Group agreed to have two definitions: one general CRS definition to cover all possibilities within the regulation and a separate ECRS definition to cover products type-approved to UN Regulation No.129.

¹ Post-meeting note: See UN Regulation No. 79, 152 or 157 for examples.

- “Production qualification test”

Marta asked the Group to consider whether production qualification testing (and therefore, a definition) is needed. Salim asked whether production qualification testing might restrict some designs. Marta replied that she didn’t see how, but if industry foresaw such problems they should raise it. At present, UN Regulations No.44 and No.129 specify production qualification testing and do not exclude built-in CRS from the provisions. However, production qualification testing is not specified in UN Regulation No.80. Rudolf explained that components such as CRS and helmets are often produced by smaller companies where the quality control might be different, although he added that it wasn’t his intention to state that smaller companies have poor quality. The Group agreed to keep the definition of production qualification testing in square brackets pending further discussion.

Application for approval

Marta explained that this section requires some thought and that other regulations will need to be used as a reference. It was agreed to come back to this section at a future meeting.

Markings

The Group reviewed the marking requirements derived from UN Regulation No.129 line-by-line and agreed any changes. Aside from minor editorial clarifications and corrections, the following key discussion points were dealt with by the Group:

- Manufacturer’s name, initials or trade mark and the year of manufacture:

The need for these markings was discussed by the Group. Marianne explained that the manufacturer’s details and year of production might be needed to help with traceability in the event of quality issues. Dinos added that passenger car seats do not require markings, but built-in CRS must have them, as specified in UN Regulations No.44 or 129. These marking requirements were left in square brackets and Marta invited the Group to research the topic and give feedback at the next meeting.

- Information indicated on the product:

Marta asked whether the orientation of the CRS relative to the vehicle is needed, since the instructions will explain how to use the CRS. The Group agreed it could be removed. She also asked whether the occupant mass is needed. Ronald explained that it might be useful for some situations and gave the example of crash test videos of a rear-facing CRS, which was sensitive to high loadings. The Group agreed to keep it for now.

- Shield and removable insert labels:

Ronald suggested that information as to where these are stowed should be included on the respective labels. The Group agreed.

- QR codes

Given the nature of the situation on buses and coaches, where parents will be using a built-in CRS they find in the vehicle, with no access to a physical user manual, the Group agreed that QR codes should be mandatory and permanently attached to the CRS.

Approval

The Group reviewed approval requirements copied from UN Regulation No.129. Some minor editorial clarifications and corrections were made with the agreement of the Group without detailed discussion.

General specifications

Marta explained that the performance requirements and test procedures would be presented together to avoid the need to skip backwards and forwards when applying the regulation. In reviewing the general specifications section, some paragraphs were highlighted to be moved to the dynamic testing section. In addition, the following items were discussed in more depth:

- **Removal of components:**
Marta said she would like to revise para. 7.2.1., which specifies rules for the removal of components from CRS. She explained that it is causing confusion in R129 and is not well defined. Marianne warned there is a risk that any change to the paragraph for this regulation might be fed back to Regulation No.129 and undermine agreements made for that regulation. Dinos added that although the wording of para. 7.2.1. might not be perfect, it was the result of very long discussions resulting in a carefully crafted consensus and compromise. Although it might not state what components it applies to, other parts of the regulation specify requirements for specific components. Ronald noted that we are discussing components used by the public and so something could be removed and stolen, equally, parts might need to be replaced for maintenance and cleaning. Marianne suggested that the paragraph could be removed altogether, to avoid future conflicts with Regulation No.129, but Marta worried that we would then allow all parts to be removed. The Group agreed to revisit the topic at the next meeting.
- **Flammability:**
Marta suggested that flammability requirements are not needed as they are covered by vehicle regulations. Michael confirmed that UN Regulation No.118 (Burning behaviour of materials) is mandatory for buses. However, Victor noted that Regulation No.118 applies to Class II and III vehicles. He asked whether it applies to M2 vehicles. This was confirmed in the meeting – Regulation No.118 applies only to M3 vehicles. Marianne added that it is not logical to specify requirements (to a built-in CRS) that are not applicable in the rest of the vehicle. Marta asked the Group to review this issue and give feedback as to the need for flammability requirements at the next meeting.

5) AOBReport to GRSP 72nd session

Item not discussed.

6) Next meeting

Marta proposed that the next meeting should be face-to-face, with a remote option. The meeting was scheduled for June 22 and 23 at the offices of CLEPA in Brussels.

Appendix 1 – Attendees

Marta Angles – Chair	Spain
Dinos Visvikis – Secretary	CLEPA
Britta Schnottale	Germany
Ronald Vroman	Consumers International
Cristina Echemendia	USA
Dirk Oschmann	OICA
Hasan Sahin	OICA
Kazumi Watanabe	Japan
Yoshinori Tanaka	Japan
Yuta Nozaki	Japan
Marianne Le Claire	CLEPA
Mark Pitcher	CLEPA
Andreas Perl	OICA
Salim Abdennadher	OICA
Michael Becker	OICA
Tomasz Lorenc-Osowski	OICA
Luis Martinez	Spain
Victor Calzadilla	Spain
Rudolf Gerlach	Germany