

21st STCBC Meeting

Safer Transport of Children in Buses and Coaches

Date: 09 July 2024

Time : 12.00h -14.00h CET

Location: Online

1) Welcome & Meeting Arrangements (Chair, Marta)

Marta (Chair, Spain) welcomed everyone to the meeting.

2) Adoption of the agenda – [STCBC-21-01](#) (All)

Marta introduced the agenda and invited comments from the Group. Mariam (Spain) explained that the European Commission found editorial mistakes in UN R170 when preparing it for translation into the official languages of the EU. She added that a Corrigendum was being prepared for the 76th session of GRSP. Marta agreed to add this topic to the agenda under AOB (Item 9). The agenda was adopted with no further additions.

3) Highlights from GRSP and GRSG

GRSP (Working Party on Passive Safety)

Marta reminded the Group of her Status Report at the 75th session of GRSP in May 2024 ([GRSP-75-06](#)). She explained that she received very little feedback from the Contracting Parties, including when she asked them for guidance on whether to allow UN R44 CRS to have additional type-approval to UN R170 (this is currently limited to R129 CRS). She asked the Group for their views on how to proceed.

Dinos (Secretary, CLEPA) expressed concern for the administrative aspects of allowing “over-the-air” type-approval for CRS that are already sold and in the hands of customers. He asked whether there is any precedent for having a type-approval without an international approval mark on the product. Rudolf (Germany) replied that some advanced driver assistance systems (ADAS) subject to UN Regulations prepared by GRVA can have functions that are activated remotely (via a software update). In these situations, an additional approval mark is not possible as the cars are already in use.

Ronald (Consumers International) expressed support for the concept, but warned it might be difficult for consumers to understand whether their UN R44 CRS now has the additional type-approval or not. He asked whether the UN Office of Legal Affairs should be consulted, particularly as this is a slightly different situation to that of ADAS.

Marta asked the Group whether they are happy to proceed with an over-the-air type-approval approach for UN R44 CRS. Michael (OICA) agreed. Marianne (CLEPA) asked how the additional type-approval would take place and warned that it could be abused. She added that the type-approval number and documentation would need to be very clear and available on a website for members of the public to check. Marta agreed these details should be specified in UN R170.

Rudolf (Germany) noted that he will be in Geneva for the 20th session of GRVA in September 2024 and could discuss the options with Edoardo and others. He added that some Contracting Parties may not have understood the concept fully during the GRSP session in May 2024. Ronald (Consumers International) agreed that some Contracting Parties may not have understood the concept and its implications fully and suggested that an explanatory presentation be made at the 76th session of GRSP in December 2024. Rudolf agreed to prepare a presentation with Marta.

Marta reported there was also no feedback from GRSP on the Group's plan to amend UN R44 to remove the obligation on Contracting Parties to accept type-approvals of built-in CRS (as done previously for non-built-in CRS). She proposed that the Group proceeds with a Working Document proposal (to be reviewed under Item 6). The Group agreed.

GRSG (Working Party on General Safety)

Rudolf (Germany) informed the Group that no GRSG session had taken place since the previous STCBC meeting in July 2024. However, he noted there was an open task (for Michael and him) regarding UN R107 (General Construction of M₂ and M₃ vehicles). This comprises suggesting an amendment of UN R107 to require that a CRS built-in to a bus or coach seat must comply with UN R170, as well as investigating the possibility of defining requirements that must be met if a seating position is designated as suitable for a CRS.

4) Review of the open issues and decisions – [STCBC-21-02](#) (All)

Marta introduced the spreadsheet document being used to track the important issues and decisions made by the Group during the development of Phase 2 of the Regulation ([STCBC-21-02](#)). The spreadsheet provides a record of the status, decisions and actions agreed by the Group at this meeting. Of particular note, the Group discussed:

- **The test procedure for installing CRS with a two-point belt:** Marta will copy the procedure from UN R44, which worked well during the sled test programme.
- **The test bench:** Michael (OICA) is working on a drawing and hopes to share it next week.
- **Labelling:** Installation drawings will not be allowed on the CRS to avoid confusion when it is used in cars. There will be separate user instructions for the installation of the CRS with a two-point belt in buses and coaches.

5) Proposal for R129 new supplement ([STCBC-21-03](#))

Ronald (Consumers International) explained that UN R129 was recently amended to specify that a CRS cannot bear more than one type-approval number. This was done to prevent CRS having more than one R129 type-approvals as a means of avoiding requirements about combining CRS features or characteristics. However, it would also mean that a UN R129 CRS would be unable to display an additional type-approval number to UN R170. He introduced a draft proposal to amend UN R129 to

remove this regulatory barrier and to allow CRS to bear an additional type-approval number to UN R170. Marriane (CLEPA) suggested that the additional wording proposed for paragraph 5.2. could be simplified and suggested that it states that “*a type of ECRS approved according to this regulation can bear an approval mark according to UN R170*”. The Group agreed that the proposal (including the revised wording) should be submitted to the 76th session of GRSP as a Working Document. Marta agreed to update the document using the UN template, and noted that it should be Supplement 12 to the 03 series and Supplement 3 to the 04 series.

6) Proposal for R44 new supplement ([STCBC-21-04](#))

Marta introduced a draft proposal to amend UN R44 to remove the obligation on Contracting Parties to continue accepting R44 type-approvals of built-in CRS. The proposal achieves this by deleting the final transitional provision (paragraph 17.25) that excuses built-in CRS from the preceding transitional provisions set previously to end the obligatory acceptance of non-built-in CRS. Marta asked the group for their views.

Dinos (Secretary, CLEPA) warned that simply deleting this transitional provision would mean that built-in CRS would not be accepted in the EU immediately, since the end dates in the preceding paragraphs have already passed. Marianne (CLEPA) added that transitional provisions are not usually deleted from UN Regulations and instead new provisions are added.

The Group agreed that a new transitional provision should be added that gives Contracting Parties the option of no longer accepting R44 type-approvals of built-in CRS. The date will be 1st September 2027. Marta will update the proposal accordingly and it will be submitted to the 76th session of GRSP in December 2024.

7) Draft UN R170 phase 2

This item was not discussed in detail. Marta invited the Group to review the documents and identify the key points where drafting work is needed.

8) Confirmation of tasks and responsibilities

Actions were recorded in the working spreadsheet ([STCBC-21-02](#)).

9) AOB

Miriam (Spain) shared some details about the Corrigendum being prepared to amend UN R170 following the editorial mistakes found by the European Commission translators. Dinos noted that UN R170 was not included in the recent proposal from the Commission to amend the EU General Safety Regulation to refer to the latest versions of the UN Regulations adopted by the EU. He asked if this was causing the hold-up and Miriam acknowledged that it was.

Marta agreed to ask Edoardo (GRSP Secretary) if the proposal can be fast-tracked to the March 2025 session of WP.29, assuming successful adoption by the 76th session of GRSP in December 2024. Miriam

noted that the GSR may be updated again in 2025, but there is no firm schedule or guarantee.

10) Next meeting

The next meeting was scheduled for 21st August 2024 (12.00-14.00, CET), online.

Appendix 1 – Attendees

On-line

Marta Angles – Chair	Spain
Dinos Visvikis – Secretary	CLEPA
Daniel Kutschkin	Australia
Kai Neumann	BDO
Marianne Le Claire	CLEPA
Ronald Vroman	Consumers International
Rudolf Gerlach	Germany
Britta Schnottale	Germany
Michal Kozlowski	IRU
Stasa Mrdovic	IRU
Koraro Mori	Japan
Yoshinori Tanaka	Japan
Michael Becker	OICA
Andreas Perl	OICA
Miriam Asiain Fernandez	Spain
Tim Janssen	TASS International
Christina Echemendia	United States