

ANEC proposal to the GRSP Informal Group on ECRS

Phase 1 of Regulation 129 (dealing with integral Isofix CRS) entered into force on 9 July 2013. At that stage the intention was to finalise phase 2 (non-integral CRS) and phase 3 (belted CRS), and phase out R44 (no new approvals) once all phases had entered into force.

The recent change of plans, involving a new approach for phase 2 and leaving finalisation of phase 3 (and maybe even a phase 4) open-ended, permits the opportunity to approve new integral CRS with Isofix connections according to R44 for an undefined period.

ANEC considers it undesirable that CRS manufacturers still can develop new products according to R44 for an undefined period, resulting in:

- Two categories of products offering two levels of protection that can be introduced on the market (R44 no side impact required, FWF as of 9kg)
- Confusion amongst consumers (mass based vs stature based)
- Less encouragement for manufacturers to develop products to the latest standard.

Therefore ANEC propose that no new R44 approvals will be granted to Isofix integral CRS as of [9 July 2016], and that transitional provisions will be amended accordingly. Pleasant side effect: no need to police for double approved (R44 and R129) products.

END.