

# Japan's Proposal and Clarification

57th GRSP Informal Group on Child Restraint System

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JASIC

# Japan's Proposal to Amend the CRS Flammability Test Procedures (GRSP-58-34)

## \* Proposal

*Paragraph 6.3.1.2., amend to read*

**“6.3.1.2. The flammability approval will be checked by one of the following methods  
Method 1 is applicable only to Enhanced Child Restraint Systems and  
Method 2 is applicable only to vehicle built-in Enhanced Child Restraint Systems.**

**Method 1 ... ..**

**Method 2 The applicant shall declare in writing that when testing materials in accordance with Annex 23 of this regulation, the materials used shall not burn, nor transmit a flame front across its surface, at a rate of more than ~~250~~ 100 mm per minute. Each material used in an enhanced child restraint system shall conform to these requirements.**

**However, ...**

## \* Justification

While these flammability test procedures for built-in CRSs are quoted from FMVSS 302, the standard has been relaxed. As this type of CRS is incorporated in the vehicle and thus can be deemed as part of the vehicle, the standard equivalent to that of FMVSS 302, i.e., 100 mm, is more appropriate.

# **Japan's Proposal to Amend the Provisions for Fitting of i-Size CRSs in the ISOFIX seating position**

## **Proposal**

**Add new paragraph 6.1.1.1 to read:**

### **“6.1.1.1**

**Forward-facing Child Restraint Systems with top tether in the i-Size category are for use in ISOFIX positions marked by the letters “IUF” in Table 2 of Appendix 3 to Annex 17 to Regulation No. 16.**

**Other Child Restraint Systems in the i-Size category may be for use in ISOFIX positions, in the same way that Child Restraint Systems in the semi-universal category may be for use in ISOFIX positions specified in Regulation No.44.”**

## **Justification**

It is not stated in Regulation No. 129, 14 or 16 that the i-Size CRSs may be for use in ISOFIX positions.

Therefore, it is necessary to state in the regulations the condition that the i-Size CRSs may be for use in ISOFIX positions in the regulations.

**(Reference) Comparison of Performance Between i-Size CRS and R44's ISOFIX Universal or Semi-universal CRS**

	<b>i-size CRS</b>		<b>R44's ISOFIX universal or semi-universal CRS</b>
Front impact performance	good	=	good
Lateral impact performance	good	>	poor
Rear impact performance	good	=	good
Rearward-facing period	15 months	>	9 months

i-Size CRS is deemed to have safety performance that is equivalent to or better than R44's ISOFIX CRS.

# Regarding the Proposal to Amend the Footnote on the Q10 Dummy for the Lateral Impact Test

Japan would like to know the justification for this proposal.

Japan thinks the following tasks are essential for Regulation No. 129:

- \* To provide lateral impact protection
- \* To recommend the use of booster seats for children up to 135 cm

The Q6 dummy is a tool to evaluate children up to 125 cm. The tool is replaced with the Q10 dummy for children taller than 125 cm. Japan considers it necessary to use the Q10 dummy in the lateral impact test. However, the current proposal to amend the footnote appears to be stating that the lateral impact evaluation is for children up to 125 cm.

Current proposal

Size range indication (in cm) <sup>1)</sup>	$\leq 60$ <sup>1)</sup>	$60 < x \leq 75$ <sup>1)</sup>	$75 < x \leq 87$ <sup>1)</sup>	$87 < x \leq 105$ <sup>1)</sup>	<del>105 &lt; x ≤ 125</del> <u>125 ≤ x ≤ 125</u> <sup>1)</sup>	<del>&gt; 125</del> <u>&gt; 125</u> <sup>1)</sup>
Dummy <sup>1)</sup>	Q0 <sup>1)</sup>	Q1 <sup>1)</sup>	Q1.5 <sup>1)</sup>	Q3 <sup>1)</sup>	Q6 <sup>1)</sup>	Q10 <sup>1)</sup>

<sup>1)</sup> No lateral impact test using the Q10 dummy is required for size range over ~~135-125~~ cm until Q10 dummy injury criteria for the lateral impact test are established.<sup>1)</sup>

Refine

Where the Enhanced Child Restraint System requires ... defined above."<sup>1)</sup>

Rev1: "No lateral impact test **using the Q10 dummy** is required for i-size booster seat with size range ~~over~~ upper limit between 125cm and 135 cm ~~until Q10 dummy injury criteria for the lateral impact test are established.~~"