

Position paper on R129 from the Netherlands

It has been found that a lot of items are treated different between different authorities. For safety and security a level playing field is needed. Therefore some definitions and descriptions should be better formulated.

In this paper a great number of these items are treated; further explanation will be given at the presentation next meeting .

I. Proposal

Paragraph 2.1., amend to read:

- 2.1. **“Enhanced Child Restraint System” (ECRS)** means a device capable of accommodating a child occupant in a sitting or supine position. It is so designed as to diminish the risk of injury to the wearer, in the event of a collision or of abrupt deceleration of the vehicle, by limiting the mobility of the child’s body. **The design is such that the ECRS has only to be adjusted to the dimensions of the child (e.g using belts or inserts) and/or the vehicle seating (e.g. adjusting the anti-rotation device); ECRS may not need further assembly but must be ready for use.**

Paragraph 2.3.2., amend to read:

- 2.3.2. **“i-Size booster seat” (Non-Integral Universal Enhanced Child Restraint System)** is a category of Enhanced Child Restraint Systems **comprising a seat cushion with an integrated backrest. An i-Size booster seat is allowed to have as add-on fixations aids, only and stowable ISOFIX connectors attachments if any,** primarily designed for use in all i-Size seating positions of a vehicle. **Only the separation between seat cushion and integrated backrest, as adjustment for the lumbar joint, is allowed to be foldable.”**

Insert a new paragraph 2.58., to read:

- “2.58. “Insert”**
Means a part of an ECRS that is in direct contact with the smaller child, cannot be used stand-alone, and is used as space reducer in an ECRS that otherwise can host only bigger children .

Paragraph 4.3., amend to read:

- “4.3. The following information shall be clearly indicated on the product:
- (a) The orientation of the Enhanced Child Restraint System relative to the vehicle;
 - (b) The size range(s) of the Enhanced Child Restraint System in centimetres, **however if the ECRS will make use of an insert, the separate parts shall indicate their applicable size ranges in centimetres;**

- © The maximum occupant mass allowed for the Integral Enhanced Child Restraint System in kilograms.

If the Enhanced Child Restraint System is to be used in combination with an adult safety-belt, the correct webbing path shall be clearly indicated by means of a drawing permanently attached to the Enhanced Child Restraint System. If the restraint is held in place by the adult safety-belt, the webbing paths shall be clearly marked on the product by colour coding. The colours used for the path of the safety-belt when the device is installed in the forward-facing position shall be red and when installed in the rearward-facing shall be blue. The same colours shall also be used on the labels on the device that illustrate the methods of use.

There shall be a clear differentiation between the intended paths for the lap section and the diagonal section of the safety belt. Indication such as colour coding, words, shapes, etc. shall distinguish between sections of the safety belt.

The marking defined in this paragraph shall be visible with the Enhanced Child Restraint System in the vehicle, with the child in the Enhanced Child Restraint System.”

Insert a new paragraph 4.7.4., to read:

- “4.7.4. An insert that is not permanently attached to the ECRS shall have a permanently attached label to indicate the make and model of the ECRS to which it belongs.**

Paragraph 6.2.3., amend to read:

- 6.2.3. It shall not be possible to remove or detach ~~without the use of specific tools~~ any components not designed to be removable or detachable. Any components that are designed to be removable for maintenance or adjustment purpose, for consumers, shall be so designed as to avoid any risk of incorrect assembly and use, as the assembly and disassembly processes shall be explained in detail in the restraint user guides.
- Any harness belt shall be capable of its full range of adjustment without disassembly;
 - **A top-tether shall be permanently fixed to the ECRS;**
 - **A support leg shall be permanently fixed to the ECRS;**
 - **An anti-rotation bar shall be permanently fixed to the ECRS;**
 - **A shoulder strap positioner shall be permanently fixed to the ECRS;**
 - **The Infant carrier module and base may be designed as combination following the rules for markings; this combination shall be detachable by using simply a maximum two hands;**
 - **An insert may be designed as detachable part, following the required markings;**
 - **An impact shield shall** (this is a reminder for CLEPA ...)

Paragraph 6.2.6., amend to read:

- 6.2.6. Enhanced Child Restraint Systems may only incorporate ~~incorporating~~ inflatable elements and these shall be so designed that the conditions of use (pressure, temperature, humidity) have no influence on their ability to comply with the requirements of this Regulation. Inflatable elements shall not be used for parts that can influence the tightening of the child and/or the ECRS.**

Moreover, to prove there is no such influence, a dynamic test, where at the start of the impact all inflatable elements are not inflated, shall be carried out.

Proposed paragraphs 6.6.4.1.6.1.1. and -2, amend to read :

6.6.4.1.6.1.1. Without the anti-rotation device in use, unless:

- a mechanism or
- a visual and audible warning signal

is provided to prevent incorrect use of the anti-rotation device.

A test without the anti-rotation device in use shall be carried out with the biggest dummy of the size range.

6.6.4.1.6.1.2. Without the shoulder strap positioner in use, unless:

- a mechanism or
- a visual and audible warning signal

is provided to prevent incorrect use of the shoulder strap positioner.

A test without the shoulder strap positioner shall be carried out with the biggest dummy of the size range.
