

Japan's Positions to the Guidance & Japan's Proposal for UN R129 Phase 3

**66th Informal Working on Child Restraint System
22nd-23rd June 2017**

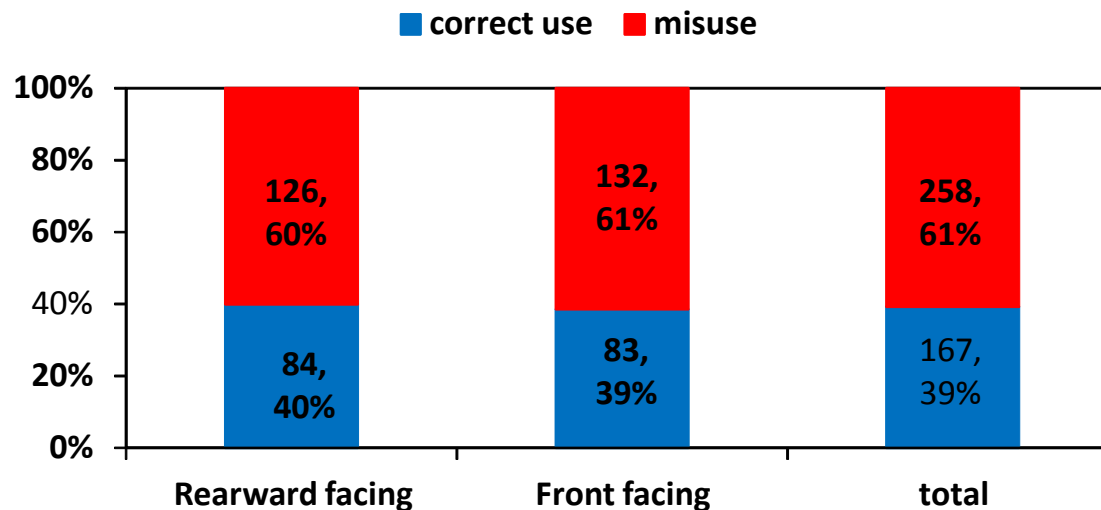
JASIC

Usage Survey of CRS in Japan

Japan Automobile Federation (JAF) and National Police Agency (NPA) conduct the actual usage survey of CRS in Japan every year.

- Based on interviews or visual checks
- Target: Children under 6 years old on board vehicles
- 547 vehicles at 16 locations in 8 regions in Japan were surveyed in 2016

The survey of the installed conditions of integral CRS

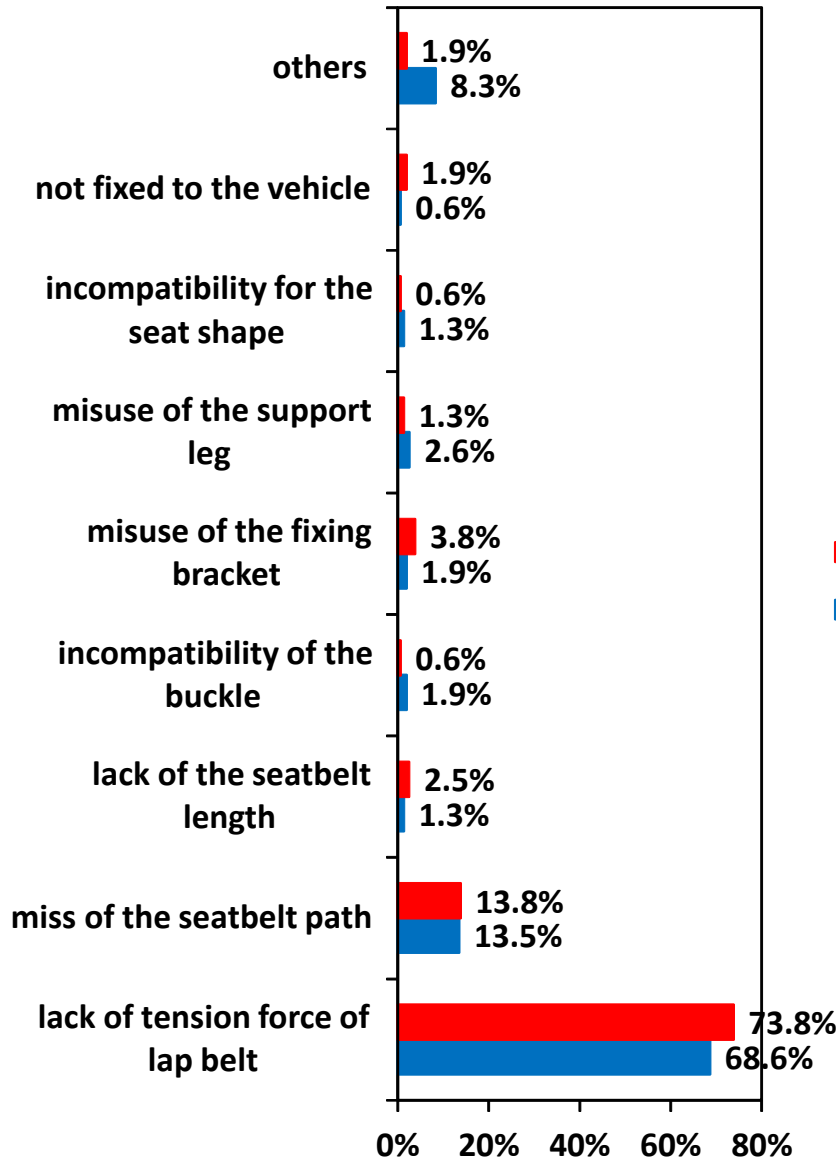


2016 research by JAF and NAP

60% of consumers misused

Usage Survey of CRS in Japan

Details of



"Lack of tension force of lap belt" and "miss of the seatbelt path" account for about 85%.

■ Front facing
■ Rearward facing

As the misuse rate is currently high in Japan, we support the principle of R129.

- **Combination of ECRS types**

- * ISOFIX (including i-Size) & Universal Belted

Japan's position:

Accept in all cases.

The reason is to consider the case that one ECRS is installed interchangeably between vehicles with and without ISOFIX anchorages, both owned by the same family.

In Japan, vehicles without ISOFIX anchorages had been sold until 2012, and they are still available.

- * i-Size & Specific to vehicle

Japan's position :

Accept only in the case for extension of size range, beyond i-Size size range, the stature range of 135 - 150 cm.

Japan's Positions to the Guidance



* Integral & Non-Integral

Japan's position :

Accept in the case as far as

(1) Components cannot be removed; and

(2) CRS has the mechanism to clearly indicate the requirements on target children for Integral and Non-Integral respectively.

Because G123 CRSs are popular in Japan probably for economical reason.

* Rearward & Forward

Japan's position :

Accept only for three types: module types (mounted on the base), rotated types, and Belted ECRS with only one adult belt routing.

Japan's Positions to the Guidance



- Sales of ECRS "not ready for use"

Japan's position :

Accept that the support-legs, top-tethers, shields, backrests or anti-rebound bars can not be removed in any cases, and can be stored or folded in any cases, for the convenience of consumers wishing to remove ECRS from vehicles and to store them in their homes.

- "Add-on" fixing points

Japan's position :

ISOFIX ECRS: Accept top-tether and support-leg.

Belted ECRS: Accept top-tether and support-leg only for Specific, provided that it is tested under the misuse conditions and satisfies the requirements.

Discussions on Phase 3 at Past CRS IWG

- At the 39th IWG, it was agreed to incorporate the CRS regulations into R129.
- At the 49th IWG, Germany commented that R129 should focus on ISOFIX because of its superiority.
- At the 50th IWG, regarding the booster cushion requirements remaining in R44 for the time being, it was decided to discuss incorporating the regulation into R129 at Phase 4(?).

Current Status of R129 and Concerns of Phase 3

- R44 is still remaining because of the booster cushion requirements. More time is necessary to incorporate R44 into R129.
- The principles of R129 is clear up to Phase 2. R129 phase 1 and phase 2 is simpler and clearer than R44.
- The draft of R129 Phase 3, including Belted CRS, becomes as complicated and difficult as R44.
- We think it difficult to include the belt routing requirement to R129 based on the principle to avoid misuse.

Performance Comparison of ISOFIX CRS and Belted CRS



	ISOFIX CRS		Belted CRS
Frontal collision	Excellent	>	Good
Lateral collision	Good	=	Good
Misuse avoidance at installation	Excellent	>	Fair

The performance to avoid misuse at installation is clearly better in ISOFIX CRS than in Belted CRS.

→ Would the inclusion of Belted CRS in the scope of R129 meet its principles?

Japan's Proposal



- As for the Integral CRS, only ISOFIX ECRS is to be included in the scope of R129, and belted CRS remains in the scope of R44.
(The discussion is necessary that R44 will be amended to reflect the contents discussed in IWG)

R129: Integral ISOFIX ECRS (i-Size, Specific),
Booster Seat (i-Size, Specific)

R44: Integral Belted CRS (Universal, Specific),
Booster cushion (Universal, Specific)

Pros and Cons of the Proposal

Pros:

- Only ISOFIX ECRS and booster ECRS will be the scope of R129, the principle to avoid misuse is satisfied.
- R129 up to phase 2 is simple and clear, and meets its principle to avoid confusion for the consumers.
- The complicated Phase 3 amendment of R129 will be terminated.

Cons:

- Multiple CRS regulations will remain.
- The complicated situation of Belted CRS will remain unsolved.
- Combination of ISOFIX ECRS and Belted CRS will be complicated.

Issues Related to the Proposal

- i-Size seating position to be mandatory under R16?
- Number of i-Size seating position under R16 (Need to increase the current number of 2? Ex.: $\frac{1}{2}$ of the number of occupants or 2 positions at each row of rear seats)
- Mandatory equipment of Specific ISOFIX ECRS in vehicles without i-Size seating position?
- Q-dummies to be used in R44?
- Lateral collision test to be introduced into R44?
- Possibility to abolish R44 in the future when vehicles with ISOFIX anchorages are in widespread use
- Others