Combination of Integral and Non-Integral Enhanced Child Restraint Systems under R129 (ECE/TRNS/WP.29/GRSP/2017/XX)

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JASIC
1) Final agreement at the 67th meeting

3.2.2. The applicant shall indicate the kind of application:

a) Application for an i-Size Enhanced Child Restraint System; or
b) Application for a specific vehicle ISOFIX Enhanced Child Restraint System; or
c) Application for a i-Size booster seat Enhanced Child Restraint System; or
d) Application for a specific vehicle booster seat Enhanced Child Restraint System; or
e) Application for a Universal belted Enhanced Child Restraint Systems; or
f) Application for Specific vehicle belted Enhanced Child Restraint Systems; or
g) Any combination of (a), (b), (c), (d) as long as they fulfil paragraph 5.4.2.2.and 6.1.3.3. or

h) Any combination of (c), (d), (e), (f), as long as they fulfil paragraph 5.4.2.2.and 6.1.3.3. provided that the booster seat is not equip with ISOFIX connectors.

Combination of Integral Belted and Non-Integral ECRS is allowed under this provision.
2) What is the color for the vehicle safety-belt?
(ECE/TRNS/WP.29/GRSP/2017/XX)

4.6.2. For Non-Integral Enhanced Child Restraint System to be used in combination with an adult safety-belt to restrain the child, the correct webbing path according to paragraph 6.1.2.5. shall be clearly marked on the product. This shall be by means of an installation drawing on a label permanently attached to the Enhanced Child Restraint System showing the correct path across the child’s body. The colours used for the adult belt route marking of the safety-belt when the device is installed shall be Green. The same colour shall also be used for the belt path on the labels on the device that illustrate the installation.

4.6.3. For Integral Belted Enhanced Child Restraint System held in place by the adult safety-belt, the webbing paths according to paragraph 6.1.2.5. shall be clearly marked on the product, and indicated by means of a drawing permanently attached to the Enhanced Child Restraint System. The colors used for the path of the adult belt route marking, when the device is installed in the forward-facing or rearward-facing positions shall be Green. The same color shall also be used on the labels on the device that illustrate the installation."

For both Non-Integral ECRS and Integral Belted ECRS, the color specified for the adult belt route marking is green.
3) Belt guide area (ECE/TRNS/WP.29/GRSP/2017/XX)

4.6. Webbing path.

The markings defined in this paragraph shall be permanently and durably attached and visible with the Enhanced Child Restraint System installed in the vehicle, and with the child seated in the Restraint System. The markings shall be placed on both sides of the Enhanced Child Restraint System. The vehicle seat illustrated on the marking shall face the same direction as the real vehicle seat.

There shall • • •.

This indicates that two illustrations – one of the right seat and the other of the left seat – will be required, each on the respective side of the CRS.
3) Belt guide area (ECE/TRNS/WP.29/GRSP/2017/XX)

4.12. Additional markings

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(g) The shoulder belt part and the lap belt part of the adult safety seat belt [used for attaching Universal Belted or Specific vehicle Belted Enhanced Child Restraint Systems] shall be indicated with specific icons for shoulder belt path and lap belt path, visible for the user, close to the belt guiding area (icon A & B) or on the installation drawings (icon C). Icon A, B and C shall have the same colour coding like used on the installation drawings and the minimum size is 20 mm in diameter.

In addition, new icons will be required for the ECRS belt guide area.
3) Belt guide area (ECE/TRNS/WP.29/GRSP/2017/XX)

If two CRS are to be installed, one on each side of the vehicle, the shoulder belt path and lap belt path in the belt guide area will be laterally inverted.

Would not this confuse consumers?
Summary

1) Is combination of Integral Belted and Non-Integral ECRS allowed under paragraph 3.2.2.?

2) If the answer to 1) is yes, it may cause confusion to consumers, as both Integral Belted ECRS (4.6.2.) and Non-Integral ECRS (4.6.3.) are required to have a green belt route marking even though the route differs between these ECRS.

3) New icons are required as “additional markings” (4.12.). However, if they are to be placed on both sides of the CRS, they will be laterally inverted. How should they be marked?