

NL contribution on CRS categorization to Inf. Group CRS 7 Oct.2008

1. SCOPE

This Regulation applies to ISOFIX universal integral child restraint systems for child occupants of power driven vehicles.

2. DEFINITIONS

For the purposes of this Regulation,

- 2.1. "Child restraint system" means a device offering the child occupant the possibility to sit on, to sit in and/or to lay in. 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.

Explanation: A *doing nothing scenario* will lead via Reg.44 to top tethers in all sold vehicles from 26-02-2011, alas a solution that is connected with much misuse! Therefore, the time seems ripe to incorporate in the New Regulation wider possibilities for ISOFIX (more configurations will be for universal use) but as return a fixation that is less sensible for misuse.

- 2.2. "ISOFIX" is an indication for the system of connection of a child restraint to vehicles. It is based on three vehicle rigid anchorages and three corresponding rigid attachments on the child restraint. The third anchorage point, meant to limit the pitch rotation of the child restraint system, must be attached to the corresponding third vehicle anchorage point located at the upper front of the seat cushion base. All three vehicle anchorages are to be approved according Regulation No.14.
- 2.3. "NON-ISOFIX" is an indication for the system of connection of a child restraint to vehicles meaning that for its fixation no use is made of the ISOFIX anchorage.
- 2.4. "Integral" is a class indication for the retention of the child occupant in the child restraint, meaning that the child is restrained by means that make part of the child restraint.
- 2.5. "Non-integral" is a class indication for the retention of the child occupant in the child restraint, meaning that the child has to be restrained by means not making part of this child restraint.

To remind people that the New Regulation and Reg.44 could be next to each other for some time (and certainly the child restraints on the market!), hereby is the suggestion to use for the category indication "UNIVERSAL" the word "Rxxx-UNIVERSAL". Furthermore, having in mind that Reg.44 has 5 categories (Universal, Semi-Universal, Specific Vehicle, Restricted and

Special Needs) hereby is also suggested to keep the New Regulation more simple

- 2.6. "Rxxx-UNIVERSAL" is a category indication for a child restraint meaning it is for use in all vehicles, not necessarily on all vehicle positions, approved according Regulation No.16 including its suitability for such a category of child restraint.
- 2.7. "Size" is a stature indication for a child restraint providing information for which range of child occupants it is meant. It is primarily based on stature, in order to facilitate proper use, but also based on maximum mass to provide manufacturers information that is related to expected maximum loads;
- 2.7.1. "Size 50-74" for children having a stature of 50 cm to 74 cm and a mass that reaches up to a maximum of 9.5 kg;
- 2.7.2. "Size 50-80" for children having a stature of 50 cm to 80 cm and a mass that reaches up to a maximum of 11 kg;
- 2.7.3. "Size 74-98" for children having a stature of 74 cm to 98 cm and a mass that reaches up to a maximum of 14.5 kg;
- 2.7.4. "Size 98-114" for children having a stature of 98 cm to 114 cm and a mass that reaches up to a maximum of 23 kg;
- 2.7.5. "Size 114-[140]" for children having a stature of 114 cm to [140] cm and a mass that reaches up to a maximum of [34] kg;
- 2.7.6. Child restraint systems may cover more than one size provided that all requirements are fulfilled.
- 2.8. "Orientation" is the indication that a child restraint system can be used forward-facing and/or rearward-facing, the following distinction is made:
- forward-facing means facing in the normal direction of travel of the vehicle;
 - rearward-facing means facing in the direction opposite to the normal direction of travel of the vehicle.

6. GENERAL SPECIFICATIONS

- 6.1. Child restraint systems may cover more than one size provided that the requirements of each size are fulfilled. Moreover each size separately has to be indicated on the child restraint and at least the shoulder heights belonging to these sizes are to be visible for the user.
- 6.2. Forward-facing is not permitted for size 50-74 and size 50-80.

- 6.3. There are no restrictions with regard to forward-facing for sizes above size 50-80, however for size 74-98 the orientation rearward-facing is strongly recommended.
- 6.4. The class integral is required for size 50-74, size 50-80 and size 74-98.
- 6.5. The class integral for an ISOFIX child restraint is restricted to size 50-74, size 50-80 and size 74-98.
- 6.6. ISOFIX child restraints of sizes above size 74-98 shall be of the class non-integral.
- 6.7. The mass of an ISOFIX child restraint shall not exceed 15 kg.

The previous is written with the understanding that both the proposed third anchorage point and the testing with better dummies could make that ISOFIX (as fixation system) with the indication Rxxx-UNIVERSAL can be used in more orientations and spread over more sizes!
