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PROPOSAL FOR DRAFT AMENDMENTS TO REGULATION No. 44 (Child restraints)

Transmitted by the expert from France

<u>Note</u>: The text reproduced below was prepared by an ad-hoc group in order to revise document TRANS/WP.29/GRSP/2001/13 introducing in Regulation No. 44 the type approval scheme (flow chart), including the production qualification and specifying the conformity of production.

It is based on informal document GRSP-34-8 and supersedes documents TRANS/WP.29/GRSP/2001/13, TRANS/WP.29/GRSP/2003/13 and TRANS/WP.29/GRSP/34, paras. 22. and 24.).

<u>Note</u>: This document is distributed to the Experts on Passive Safety only.

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List of contents,

Insert a new item 11, to read:

"11. Production qualification"

Items 11 to 16 (former), renumber as items 12 to 17

Insert a new annex 14, to read:

"Annex 14 – Type approval scheme (flow chart ISO 9002)"

Text of the Regulation,

<u>Insert new paragraphs</u> 2.37. to 2.39., to read:

- "type approval test", means a test to determine the extent to which a child restraint system type submitted for approval is capable of satisfying the requirements.
- 2.38. "production qualification test", means a test to determine whether the manufacturer is able to produce a child restraint system in conformity with the child restraint systems submitted for type approval.
- 2.39. "Routine testing", means the testing of a number of restraint systems selected from a single batch to verify the extent to which they satisfy the requirements."

Paragraph 3.4., amend to read:

"3.4. The approval authority of a Contracting Party must verify - before granting type approval - the existence of satisfactory arrangements and procedures for ensuring effective control so that child restraint systems, equipment or parts when in production conform to the approved type."

<u>Insert new paragraphs 6.3. and 6.4.1.</u>, to read:

- "6.3. Control of Markings
- 6.3.1. The technical service conducting the approval tests shall verify that the markings conform to the requirements of paragraph 4.
- 6.4. Control of Instructions on Installation and the Instructions for Use
- 6.4.1. The technical service conducting the approval tests shall verify that the instructions on installation and the instructions for use conform to paragraph 15."

Paragraph 9., amend to read:

"9. TEST REPORTS OF TYPE APPROVAL AND OF PRODUCTION QUALIFICATION"

Add a new paragraph 9.4., to read:

"9.4 The test reports of type approval and of production qualification shall record the verification of markings and of instructions on installation and use."

Insert a new paragraphs 11.to 11.2.3.1., to read:

- "11. PRODUCTION QUALIFICATION
- 11.1. In order to make sure that the manufacturer's production system is satisfactory, the technical service, which conducted the type approval tests, must carry out tests to qualify production in accordance with paragraph 11.2.
- 11.2. Qualifying the production of child restraint systems

The production of each new approved type of child restraint system of categories "universal", "semi-universal", and "restricted" must be subjected to production qualification tests.

For this purpose, a random sample of [5] child restraint systems will be taken from the first production batch.

The first production batch is considered to be the production of the first block containing a minimum of [50] child restraint systems and a maximum of [5000] child restraint systems.

- 11.2.1. Dynamic tests
- 11.2.1.1. [5] child restraint systems must be subjected to the dynamic test described in paragraph 8.1.3. The technical service that conducted the type approval tests shall choose the conditions that produced the maximum horizontal head excursion during the type approval dynamic tests, excluding the conditions described in paragraph 7.1.4.10.1.2, above. All the [5] child restraint systems shall be tested under the same conditions.
- 11.2.1.2. For each test described in 11.2.1.1 the horizontal head excursion and chest accelerations shall be measured.
- a) The maximum horizontal head excursion results shall comply with the following two conditions:-

No value shall exceed 1.05 L, and

X + S shall not exceed L,

Where: L= the limit value prescribed

X= the mean of the values

S= the standard deviation of the values

b) The chest acceleration results shall comply with the requirements of paragraph 7.1.4.2.1 and, in addition, the X + S condition in 11.2.1.3 a) shall be applied to the 3ms clipped resultant chest acceleration results (as defined in 7.1.4.2.1) and recorded for information only.

- 11.2.2. Control of Markings
- The technical service that conducted the approval tests shall verify that the markings conform to the requirements of paragraph 4.
- 11.2.3. Control of Instructions on Installation and the Instructions for Use
- 11.2.3.1. The technical service that conducted the approval tests shall verify that the instructions on installation and the instructions for use conform to paragraph 15."

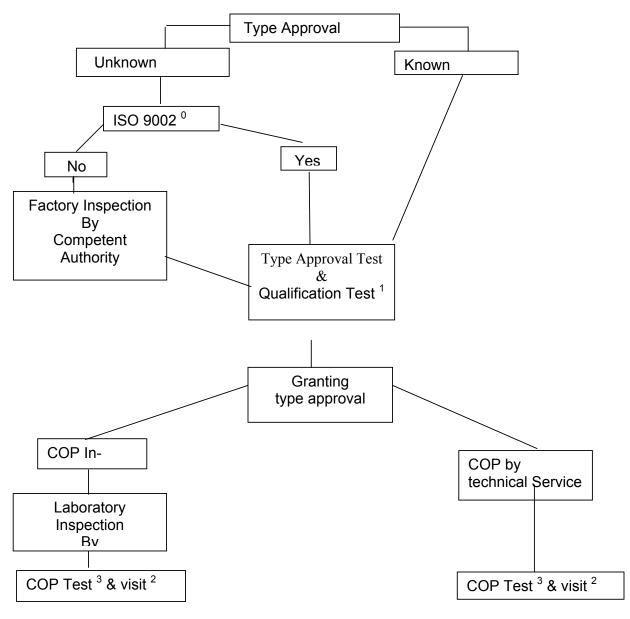
Paragraph 11. (former), renumber as paragraph 12.

<u>Paragraphs 12. to 16. (former)</u>, renumber as paragraphs 13. to 17.

Insert a new annex 14, to read:

"Annex 14

TYPE APPROVAL SCHEME (FLOW CHART ISO 9002)



- 0) or an equivalent standard to this one
- 1) these tests shall be done by technical service
- 2) visit to the manufacturer for inspection and random sampling by the Authority or technical service a) if there is no ISO 9002: 2 times a year
 - b) if there is an ISO 9002: 1 times a year
- 3) tests in accordance with annex 16
 -) tests in accordance with annex
 - a) if there is no ISO 9002:
 - i. of the Authority or technical service during the visit of footnote 2a
 - ii. of the manufacturer between the visits of footnote 2b
 - b) if there is an ISO 9002: taken by the manufacturer, procedure checked during visit of footnote 2b.

Annex 16,

Paragraphs 2.1. to 2.2.2.6., amend to read:

- "2.1. The frequency of testing to the requirements of paragraphs 1.1. to 1.5. and 1.7. shall be on a statistically controlled and random basis in accordance with one of the regular quality assurance procedure, and must be conducted at least once per year.
- 2.2. Minimum conditions for the control of conformity of child restraint systems of categories "Universal", "Semi Universal" and "Restricted", in relation to the dynamic tests according to paragraph 1.6.

In accordance with the relevant authorities, the holder of an approval will supervise the control of conformity following the method of batch control (paragraph 2.2.1.) or following the method of continuous control (paragraph 2.2.2.).

- 2.2.1. Batch control for the child restraint systems
- 2.2.1.1. The holder of an approval must divide the child restraint systems into batches which are as uniform as possible in regard to raw material or intermediate products involved in their manufacture (different colour of shell, different manufacture of harness) and in regard to production conditions. The numbers in a batch must not exceed [5000] units.

In agreement with the relevant authorities the tests can be carried out by the technical service authorities or under the responsibility of the holder of an approval.

- 2.2.1.2. A sample must be taken in each batch in accordance with the provisions of paragraph 2.2.1.4. from a minimum of 20 per cent of the batch quantity, which has to be produced of the actual batch.
- 2.2.1.3. The characteristics of the child restraint systems and the number of dynamic tests to be conducted are given in paragraph 2.2.1.4.
- 2.2.1.4. In order to be accepted, a batch of child restraint systems must satisfy the following conditions:

Number in the	Number of	Combined	Acceptance	Rejection	Degree of
batch	samples/child restraint	number of	criteria	criteria	control rigour
	systems characteristics	samples			
N<[500]	1st = 1MH	1	0	-	Normal
	2nd = 1MH	2	1	2	
[500] <n<[5000]< td=""><td>1st = 1MH + 1LH</td><td>2</td><td>0</td><td>2</td><td>Normal</td></n<[5000]<>	1st = 1MH + 1LH	2	0	2	Normal
	2nd = 1MH + 1LH	4	1	2	
N<[500]	1st = 2MH	2	0	2	Strengthened
	2nd = 2MH	4	1	2	
[50] <n<[5000]< td=""><td>1st = 2MH + 2LH</td><td>4</td><td>0</td><td>2</td><td>Strengthened</td></n<[5000]<>	1st = 2MH + 2LH	4	0	2	Strengthened
	2nd = 2MH + 2LH	8	1	2	

Note:

MH signifies harder configuration (the least good results obtained in approval or extension of approval)

LH signifies less hard configuration (the best results obtained in approval or extension of approval)

This dual sampling plan functions as follows:

For a normal control, if the first sample does not contain any defective units the batch is accepted without testing a second sample. If it contains two defective units the batch is rejected. Finally, if it contains one defective unit a second sample is extracted and it is the cumulative number, which must satisfy the condition of column 5 of the table above.

There is a change from normal control to strengthened control if, out of 5 consecutive batches, two are rejected. Normal control is resumed if 5 consecutive batches are accepted.

If any batch is rejected, the production is considered to be non-conforming and the batch shall not be released.

If 2 consecutive batches subjected to the strengthened control are rejected, the provisions of paragraph 13. are applied.

- 2.2.1.5. The control of child restraint systems conformity is undertaken starting with the batch manufactured after the first batch which was subjected to production qualification.
- 2.2.1.6. The test results described in paragraph 2.2.1.4. shall not exceed L, where L is the limit value prescribed for each approval test.
- 2.2.2. Continuous control
- 2.2.2.1. The holder of an approval shall be obliged to carry out continuous quality control on a statistical basis and by sampling. In agreement with the relevant authorities, the tests can be carried out by the technical service authorities or under the responsibility of the holder of an approval.

- 2.2.2.2. The samples must be taken in accordance with the provisions of paragraph 2.2.2.4.
- 2.2.2.3. The characteristic of the child restraint systems is taken at random and the tests to be carried out are described in paragraph 2.2.2.4.
- 2.2.2.4. control shall meet the following requirements.

Child restraint systems taken	Degree of control	
	rigour	
[0.02] % means one child restraint system taken from	Normal	
every [5000] manufactured		
[0.05] % means one child restraint system taken from	Strengthened	
every [2000] manufactured	-	

This dual sampling plan functions as follows:

If the child restraint system is considered to conform, the production conforms.

If the child restraint system does not meet the requirements, a second child restraint system shall be taken,

If the second child restraint system meet the requirements, the production conforms,

If both (the first and the second) child restraint systems do not meet the requirements, the production does not conform and child restraint systems that are likely to present the same failure shall be withdrawn and necessary steps shall be taken to re-establish the conformity of the production.

Strengthened control will replace normal control if, out of [10000] child restraint systems manufactured consecutively, the production has to be withdrawn twice.

Normal control is resumed if [10000] child restraint systems manufactured consecutively are considered to conform.

If production subjected to the strengthened control has been withdrawn on two consecutive occasions, the provisions of paragraph 13. are applied.

- 2.2.2.5. The continuous control of child restraint systems is undertaken starting after the production qualification.
- 2.2.2.6. The test results described in paragraph 2.2.2.4. shall not exceed L, where L is the limit value prescribed for each approval test."

Add a new paragraph 2.3.2., to read:

"2.3.2. Where a test sample fails a particular test to which it has been subjected, a further test to the same requirement shall be carried out on at least three other samples. In the case of dynamic tests if one of the latter fails, the production is considered to be non-conforming and the frequency shall be raised to the higher one if the lower one was used according to paragraph 2.3. and necessary steps shall be taken to re-establish the conformity of the production."

Paragraph 2.4., amend to read:

"2. 4. When production is found to be non-conforming according to paragraphs 2.2.1.4., 2.2.2.4. or 2.3.2., the holder of the approval or his duly accredited representative shall:

Paragraph 2.4.2., should be deleted.