

## **Extension of ECE R44 CRS for M2 and M3 vehicles**

### **Justification**

Based on the analysis of regulatory documents it appears that all have a coherent field of application concerning the use of child restraint systems (CRS), except for ECE R44 which do not limit their field of application except for ISOFIX CRS.

### ***Scope of different regulations and directives:***

**In directive 2003/20/CE (relative à l'utilisation obligatoire de ceintures de sécurité et de dispositifs de retenue pour enfants dans les véhicules)**

- the definitions of safety systems, including safety belts and **child restraints, with regard to vehicles in categories M1 and N1, and of the components thereof shall be those appearing in Annex I to Directive 77/541/EEC(13),**
- where a child-restraint system is used, **it shall be approved to the standards of UN-ECE Regulation 44/03 or Directive 77/541/EEC**, or any other subsequent adaptation thereto;
- until 9 May 2008 Member States may permit the use of child-restraint systems **approved in accordance with the national standards applicable in the Member State on the date of installation of the restraint system or with national standards equivalent to Regulation 44/03 of the United Nations Economic Commission for Europe or Directive 75/541/EEC.**

**Scope of directive 77/541/CEE as modified by 2005/40/CE directive (relating to safety belts restraint systems and child restraint systems of motor vehicles)**

This Directive applies to safety belts and restraint systems which are designed for installation in vehicles conforming to the definition given in Annex II to Directive 70/ 156/ EEC and are intended for separate use, i. e. as individual fittings, by persons of adult build occupying forward or rearward-facing seats and **to child restraint systems designated for installation in vehicles of category M1, N1.**

**Scope of regulation ECE R16 (C17 + r2 C16 + r4 et r5 C15)**

This Regulation applies to safety-belts and restraint systems which are designed for installation in vehicles and are intended for separate use, i. e. as individual fittings, by persons of adult build occupying forward or rearward-facing seats. **It also applies to child restraint systems and ISOFIX child restraint systems designated for installation in vehicles of category M1 and N1. \*/**

## **Conclusion:**

Concerning Brussels directives and ECE R16 regulation the link with ECE R44 regulation is limited only to light vehicles M1 and N1.

### **Scope of regulation ECE R44 (Suppl. 2, 04 serie)**

This Regulation applies to child restraint systems which are suitable for installation **in power-driven vehicles having three or more wheels**, and which are not intended for use with folding (tip-up) or with side-facing seats.

This non defined scope includes in theory all power driven vehicles (M, N and even L!) However technical data on which ECE R44 regulation has been elaborated are based on category M1 or N1 light vehicles accident studies and the technical assessments are specific to this accident typology, to the performance and to the configuration, particularly dimensions, of light vehicles. Therefore it should be necessary to define in ECE R44 regulation the field of validity of its requirements.

## **Proposal**

Concerning vehicles categories other than M1 and N1 we can extend:

- 1) to M2 the possible use of ECE R44 CRS if requirements concerning their installation are included in ECE R16 regulation in § 1. and 8.3.5.<sup>1</sup> together with § 1. of ECE R14. regulation.
- 2) to M3 the possible use, at any seating position in the passenger compartment of the vehicle, of Group II or III ECE R44 non integral CRS if requirements concerning their installation are included in ECE R16 regulation in § 1. and 8.3.5.<sup>1</sup> together with § 1. of ECE R14. regulation.
- 3) to M3 the possible use, only at seating position in the passenger compartment of the vehicle, of Group 0, 0+ and I ECE R44 integral CRS if requirements concerning access to the aisle and to exit for other passengers and if requirement concerning their installation are included in ECE R16 regulation in § 1. and 8.3.5.<sup>1</sup> together with § 1. of ECE R14. regulation.

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<sup>1</sup> Manufacturer notification in a special table defined in annex 17 of ECE R16 regulation of seating positions compatible or not with different groups and categories of CRS.

## Modifications

### ECE R16 Regulation

#### §1. SCOPE

*This Regulation applies to safety-belts and restraint systems which are designed for installation in vehicles and are intended for separate use, i. e. as individual fittings, by persons of adult build occupying forward or rearward-facing seats. It also applies to child restraint systems and ISOFIX child restraint systems designated for installation in vehicles of category M1, **M2, M3** and N1. \*/*

*§ 8. 3. 5. In order to inform the vehicle user( s) of the provisions made for the transport of children, vehicles of categories M 1, **M2, M3** and N 1 shall meet the information requirements of annex 17 . Any vehicle of category M 1 must be equipped with ISOFIX positions, in accordance with the relevant prescriptions of Regulation No. 14.*

### ECE R14 Regulation

#### §1. SCOPE

*This Regulation applies to anchorages for safety-belts intended for adult occupants of forward-facing or rearward-facing seats in vehicles of categories M and N. 1/  
It also applies to ISOFIX anchorages systems and ISOFIX top tether anchorages intended to ISOFIX child restraint systems installed in vehicles of category M1. ~~Other categories~~ **Other categories** vehicles fitted with ISOFIX anchorages have also to comply with the provisions of this Regulation.*