Proposal for Supplement 5 to Regulation No. 44 (CHILD RESTRAINT SYSTEM)

Note: The text reproduced below was prepared by the expert from Spain on behalf of TSG in order to improve document ECE-TRANS-WP.29-GRSP-2011-30e.doc proposed by Spain

I. Proposal

Insert a new paragraph 7.2.7., to read:

- "7.2.7. ISOFIX attachment shall have a locking mechanism which complies with the requirements a or b as follows:
 - (a) Release of the locking mechanism requires 2 consecutive actions, the first of which should be maintained while the second is carried out; or
 - (b) A complete ISOFIX attachment mechanism, which has not been previously subjected to a load, shall be used for a no-load opening test. The force needed to open the ISOFIX attachment when it is not under load shall be in the range of at least 40 N in the tests prescribed in paragraph 8.2.9. below."

Insert new paragraphs 8.2.9. to 8.2.9.5., to read:

- "8.2.9. ISOFIX attachment opening test under zero load:
- 8.2.9.1. A load shall be applied at a speed of 400 ± 20 mm/min to the release button or handle along a fixed axis running parallel to the initial direction of motion of the button/handle; the geometric centre applies to that part of the surface of the ISOFIX attachment to which the release pressure is to be applied. The ISOFIX attachment shall be secured against a rigid ISOFIX anchor during the application of the opening force.
- 8.2.9.2. The ISOFIX attachment opening force shall be applied, using a dynamometer or similar device in, the normal manner and direction as indicated in the Manufacturers user manual. The contact end shall be a polished metal hemisphere with radius 2.5 ± 0.1 mm for a release button or a polished metal hook with a radius of 25 mm
- 8.2.9.3. The ISOFIX attachment opening force shall be measured and any failure noted.
- 8.2.9.4. An ISOFIX attachment assembly which has not previously been subjected to a load shall be mounted and positioned under a "no load" condition.
- 8.2.9.5. The ISOFIX attachment opening force shall be measured."

II. Justification

1. In the current text of Regulation No. 44 there are no requirements to prevent users, or a sibling sitting next to the CRS, to unintentionally disengage ISOFIX child restraints from their anchor points.

2. The proposed amendment of ECE-TRANS-WP.20-GRSP-2011-30e is in line with requirements of TR13387 General and Safety Guidelines for Child Care Articles defining the necessity of two separate actions to release a locking mechanism and EN 716-1 2008 Standard about Children's cot and folding cot for domestic which define a minimum force level to prevent a Child to operate a release mechanism.