PROPOSAL FOR AMENDMENTS TO REGULATION No. 16 (safety-belts)

Note: The text reproduced below was prepared by the expert from the Netherlands in order to provide an installation procedure for child restraints that also takes account of the position of the seat located in front of the seat that is tested for its ability for the installation of child restraints.

The modifications to the existing text of Regulation No. 16 are marked in bold or strikethrough characters.

I. Proposal

Annex 17 – Appendix 2, Paragraph 2.2., amend to read:

"2.2. Adjust the seat-back angle to the manufacturer's design position and the head restraint in the lowest and rearmost position. In the absence of any specification an angle of the seat-back corresponding to a torso angle of 25° from the vertical, or the nearest fixed position of the seat-back, shall be used.

When checking a CRF on a rear seat, the vehicle seat located in front of this rear seat may be adjusted longitudinally forward but not further than the mid position between its rearmost and fore most positions. a position capable of accommodating one person seated who is at least as large as:

- (a) for the drivers seat, the manikin of the 50th percentile male, with the seat-back in its design angle;
- (b) for the passenger seat, the manikin of the 5th percentile adult female. The seat backrest seat-back angle may also be adjusted, but not to a more upright angle than corresponding to a torso angle of 15°."

Annex 17 – Appendix 2, Paragraph 3.3., amend to read:

"3.3. Should the above requirements not be met with the adjustments indicated in paragraph 2. above, **then**, **in the case of passenger seats**, the seats, the seatsbacks, the head restraints may be adjusted to alternative positions designated by the manufacturer for normal use following which the above installation procedure shall be repeated and the requirements verified and met. These alternative positions shall be included as information in table 2 given in Appendix 3 to this annex.

If the alternative position concerns a passenger seat, in front of the rear seat on which the CRF is installed, adjusted more forward and/or with a seat-back more inclined than indicated in paragraph 2.2., it shall be included as information in table 2 given in Appendix 3 to this annex, this seat is not to be occupied in this alternative position."

II. Justification

Front seats, in front of the rear seat on which the CRF is installed, may be adjusted to an alternative position designated by the manufacturer for normal use. "Normal use" is not specified which leads to situations where front seats are moved forward too much in order to allow the installation of a CRF on the rear seat. Especially for small cars in combination with large rearward-facing fixtures this causes at present improper seating positions. These improper seating positions concern occupants seated too close to the dashpanel, airbag, steering wheel and, in case of the driver, too much forward for safe driving.

In order to safeguard enough space for the driver and front passenger for safe driving, this proposal modifies the text of Regulation 16 by aligning the "normal use position" with the Commision Regulation (EU) No 678/2011 newly defined "seating position".

Also "seat backrest" has been corrected to "seat-back" since that is the common expression within Regulation 16.