



European Association of Automotive Suppliers

Informal document GRSP-74-03
GRSP 74th session, 04 – 08th December 2023
Agenda Item 12

Ensuring CRS compliance with UN R129

Submitted by the experts from CLEPA

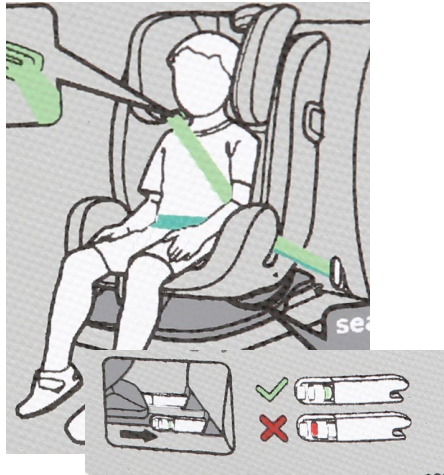
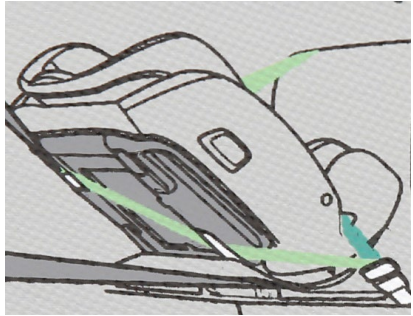
74th session of GRSP, 04 – 08th December 2023

R129 SETS STRICT DESIGN REQUIREMENTS TO REDUCE MISUSE (& IMPROVE REAL-WORLD SAFETY)



- Only **one belt route allowed** on the CRS (para. 3.2.2.)
 - Applies across all configurations of the CRS
- Integral CRS must be **ISOFIX or belt-attached** (para. 3.2.2.)
 - A CRS cannot offer both installation options
- Only **ISOFIX attachments** can use **ISOFIX anchorages** (para. 6.1.3.2.)
 - Components that use vehicle ISOFIX must fulfil CRS ISOFIX requirements
- **ISOFIX not allowed** on boosters when the **CRS is also approved as belt-attached integral** for younger children (para. 3.2.2.)
 - Prevents ISOFIX on belt-attached integral CRS that are combined with boosters

SEVERAL R129 TYPE-APPROVED CRS APPEAR NOT TO COMPLY WITH THESE REQUIREMENTS



Belt route 1: Belt-attached integral
(Child: 40-105 cm)

Belt route 2: Belt-attached integral
(Child: 100-145 cm)

CRS 1 (EX Type-approval)

- Two belt routes (para. 3.2.2)
- Non-ISOFIX attachments (para. 6.1.3.2)
- 'ISOFIX' on belt-attached integral/booster combination (para. 3.2.2.)

CRS	Authority	Non-compliance
CRS 2	EX	Two belt routes (para. 3.2.2.)
CRS 3	EX	Two belt routes (para. 3.2.2.)
CRS 4	EX	Two belt routes (para. 3.2.2.)
CRS 5	EX	ISOFIX and belt-attached installation options (para. 3.2.2.) No anti-rotation device with approval on test bench (para. 6.6.4.1.2.)
CRS 6	EX	ISOFIX and belt-attached installation options (para. 3.2.2.)
CRS 7	EY	Two belt routes (para. 3.2.2.)
CRS 8	EZ	Two belt routes (para. 3.2.2.)
CRS 9	EZ	Two belt routes (para. 3.2.2.)
CRS 10	EZ	Two belt routes (para. 3.2.2.)

SOME OF THESE REQUIREMENTS HAVE BEEN CLARIFIED TO PREVENT FUTURE ERRORS



Clarification of one belt route requirement

Oct. 2017

Minutes UN IG CRS ([CRS-68-13](#))

“One belt route applies across all categories of CRS”

May. 2021

UN Inf. Doc ([GRSP-69-09](#))

NL asks for guidance on one belt route interpretation. CPs agree strict interpretation applies and see no need to amend R129

Feb. 2023

TSG23.02-01-5.1_R129-03 single belt route

“Only one belt route applies for the entire size range of the seat”

Dec. 2017

UN Inf. Doc. ([GRSP-62-28](#))

Introduces UN R129.03, including one belt route rule (slide 10)

Feb. 2023

Question to TAAM by NL

Asks TAAs if one belt route applies across integral and booster combinations. TAAs accept it does and there is “no room for interpretation”

May 2023

UN Work. Doc. ([../GRSP/2023/11*](#))

Clarifies “one belt route applies over entire stature range regardless of different configurations”

*As amended

WHAT CAN/SHOULD BE DONE WITH TYPE-APPROVED CRS ALREADY ON MARKET?



- **CRS with features/functionality not allowed by R129, but desirable to users, might become very popular**
 - These CRS could stay on the market for several years with no competition
 - Are there implications for real-world safety?
- **How is Article 4 of the 1958 Agreement being applied in these cases?**
 - *Para. 3: “If a non-conforming product, as referred to in paragraph 2 of this Article, has not been brought into conformity within a period of three months, the Contracting Party responsible for the approval shall temporarily or permanently withdraw the approval”.*