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Inland Transport Committee

World Forum for Harmonization of Vehicle Regulations**Working Party on Passive Safety****Seventy-eighth session**

Geneva, 1–4 December 2025

Item 14 of the provisional agenda

UN Regulation No. 129 (Enhanced child restraint systems)**Proposal for supplement 4 to the 04 series of amendments to
UN Regulation No. 129 (Enhanced child restraint systems)****Submitted by the expert from the Kingdom of the Netherlands ***

The text reproduced below was prepared by the members of the Technical Services Group (TSG) and is presented on their behalf by the expert from the Kingdom of the Netherlands to clarify that the removal of an insert may also trigger additional tests with alternative dummy statures. It is based on informal document GRSP-77-34. It is combined with the proposal prepared by the IWG-IWVTA to delete the Unique Identifier (UI) descriptions (based on informal document GRSP-77-12). The modifications are marked in bold for new and strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2025 as outlined in proposed programme budget for 2025 (A/79/6 (Sect. 20), table 20.6), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.



I. Proposal

Paragraph 5.5., delete and renumber paragraphs 5.6. to 5.8. as 5.5. to 5.7.

Paragraph 7.1.3.6., amend the paragraph under the table to read:

“Where the Enhanced Child Restraint System requires substantial modification for different sizes (e.g., convertible Enhanced Child Restraint System, **or when an insert is provided/removed**) or if the size range covers more than 3 size ranges a relevant intermediate dummy(ies) shall be tested in addition to the dummy(ies) defined above.”

II. Justification

A. Clarification regarding the addition or removal of an insert

1. Removing an insert results in a new size range being determined. For example, if the child seat has a size range of 40-85 cm, this seat uses an insert with a size range of 40-60 cm. If the insert is removed, a size range of 61 to 85 cm remains. This means that the tests must also be carried out with Q1 as the smallest dummy for this 'new' range. At present, it may not be clear that a 'substantial change' may include the removal of an insert.

B. Unique Identifier (UI) marking

2. WP.29, during its 195th session in March 2025, adopted the proposal prepared by the informal working group on the International Whole Vehicle Type Approval, ECE/TRANS/WP.29/2025/17. That proposal puts the implementation of the UI marking on hold by amending Schedule 5 of the 1958 Agreement accordingly.

3. UN Regulation No. 129 already foresaw the possibility for the alternative UI marking and introduced a ban on its use in paragraph 5.5., as it was found inappropriate for the purpose of this UN Regulation.

4. Due to the amendment to Schedule 5 of the 1958 Agreement, the IWG on I WVTA considered amendments to UN Regulations necessary to delete all UI references.

5. As the UI concept was not yet implemented into the UNECE secure internet database 'DETA', UI markings could also not have been applied yet. Therefore, including this amendment in a Supplement is considered appropriate.

6. The reference in paragraph 5.8. does not need to be renumbered as this is currently incorrect and will now, with the deletion of paragraph 5.5. refer again to the correct paragraph number.
