

IRU Position Paper on Child Restraint Systems (CRS) in Buses and Coaches

Ensuring safe transport of children in buses and coaches.

I. IRU POSITION

IRU strongly supports the initiative to enhance the safe transport of children by bus and coach and welcomes the ongoing discussions at the United Nations Economic Commission for Europe (UNECE). The UNECE's Working Group on the Safer Transport of Children in Buses and Coaches (IWG STCBC) is currently exploring ways to enhance child safety in buses and coaches, particularly through the potential implementation of child restraint systems (CRS).

As the representative voice of commercial road transport operators, IRU advocates for forward-thinking solutions that prioritise the future of our industry. For legacy reasons of limited standardisation, we emphasise the priority of innovative approaches over retrofitting existing buses and coaches. We underscore the need for solutions tailored to the specific requirements of the passenger transport sector. Given the diverse designs and uses of buses and coaches by transport operators, mandating a fixed number of seats suited for CRS would be impractical and financially burdensome.

It is crucial to establish rules that allow operators to determine the appropriate number of seats suited for CRS based on the specific characteristics of the passenger groups they transport. IRU proposes the following solutions:

- 1. Preserve operator's flexibility:** Maintain the needed flexibility for transport operators to decide the necessary number of seats suitable for CRS based on the unique needs of their passengers and the type of transport operation. Due to the potential loss of seat capacity, mandating a minimum number of seats suitable for CRS would impact the efficiency of business operations and undermine the broader transition to collective mobility essential for achieving decarbonisation goals.
- 2. Provide guidance, not mandates:** Rather than imposing a fixed number of seats and making CRS compulsory in buses and coaches, relevant authorities should offer guidance and recommendations for the use of CRS in buses and coaches. This approach allows for adaptability while promoting safety.
- 3. Raise public awareness:** Advocate for the development of education and awareness campaigns. National authorities should develop initiatives to promote the use of seat belts in buses and coaches, contributing to overall passenger safety.

II. ANALYSIS

Child restraint systems (CRS), commonly known as child seats, are crucial for the safety of children when travelling in vehicles. CRS is meant to protect against injuries, reduce impact in case of collision, and ensure overall proper positioning of the child.

The United Nations Economic Commission for Europe (UNECE) plays a significant role in the development of international standards for child restraint systems. UNECE Regulation No. 44 and No. 129 are the most widely recognised international standards for CRS. These regulations provide uniform technical prescriptions for the approval of CRS, including safety performance requirements and testing procedures. Recently, UNECE adopted a new regulation stipulating the type-approval of special integrated child seats with tailored belts for children in buses and coaches.

Since 2019, IRU has been actively engaged in UNECE's Informal Working Group for Safer Transport of Children in Buses and Coaches (IWG STCBC). Our main goal is to enhance child safety in buses and coaches, aligning with UNECE's efforts to create safer conditions for the youngest passengers during road travel. Currently, there are discussions regarding whether the use of CRS (built-in or separate) should be made compulsory in buses and coaches.

IRU advocates for forward-looking solutions that cater to the future of the bus and coach industry. For legacy reasons of limited standardisation, retrofitting existing buses and coaches would prove both costly and unrealistic. We emphasise the importance of new flexible solutions that meet the unique needs of the bus and coach transport sector.

1. CRS in road passenger transport (bus and coach)

Presently, there is no legal requirement for child seats in buses and coaches. Regulations and practices vary among Member States, and not all vehicles are equipped with dedicated systems or seats that can accommodate CRS. Typically, children are secured using two-point lap belts. The absence of dedicated CRS in all buses and coaches is a consequence of the intricate design and operational challenges posed by buses and coaches that differ from passenger cars.

Buses and coaches are designed to transport larger groups of passengers for various purposes, including public transport, tourism, school trips, and special events. The number of passengers can vary significantly depending on the specific service and route. For example, a city bus has different demands compared to a charter bus used for group tours. Even within group tours, the operational demands of school excursions differ significantly from those transporting senior citizens to a scenic destination. It is crucial to acknowledge that only transport operators possess the insight and capacity to comprehensively evaluate and balance the equipment of each vehicle in their fleet with passengers' transport requirements.

Given the diverse roles of buses and coaches, the decision to employ CRS must align with the specific demands of each scenario. When CRS are used in buses or coaches, the process typically involves the following steps:

- a) Selecting appropriate CRS based on the age of children:
 - Depending on the child's age, weight and height, the appropriate type of CRS is selected. These could include rear-facing seats, forward-facing seats, or booster seats.
- b) Installation:
 - The CRS is installed securely on the bus seat, often using the vehicle's seat belts. Certain buses may be equipped with dedicated anchor points or systems such as ISOFIX. Additionally, the seats need to have adjustable seat belts to accommodate different CRS, based on the age, and thus the length, of the child.
- c) Compliance with regulations:
 - Operators must comply with regulations regarding the use of CRS in buses and coaches. In practical terms, this could mean that the distance between seats

accommodating CRS might need to be longer, potentially leading to a reduction in the overall seating capacity for the operator.

Imposing a rigid CRS mandate on all vehicles may fail to address the diverse needs of different passenger groups, resulting in inefficiencies and inconveniences, and a loss of capacity that undermines not only passenger transport operations but also the broader transition to collective mobility essential for achieving decarbonisation goals.

2. IRU's proposed solutions

IRU advocates for a practical and flexible approach to address the challenges of child transport safety in road passenger transport:

Bus and coach operators face the challenge of managing their businesses with flexibility and adapting to dynamic demands and market conditions. The diverse range of passengers and operational scenarios makes implementing a one-size-fits-all solution impractical. Mandating a specific number of seats suitable for CRS could compromise the overall safety objectives set by the industry and limit the adoption of innovative safety solutions by businesses.

Moreover, such a mandate would require significant alterations to bus and coach designs, incurring both logistical and financial challenges. Retrofitting existing vehicles to meet a specified number of CRS seats presents operational obstacles, such as the installation of CRS necessitating specific distances from the front seats, potentially resulting in the loss of entire rows of seats and reducing overall seating capacity, even for transport operators that do not transport children.

Instead of mandating a fixed number of CRS seats in coaches, we propose providing guidance for the use of CRS in coaches, allowing for tailored application in specific cases. This approach ensures flexibility and consistency in addressing CRS requirements.

IRU advocates the following approach to address child transport safety in coaches:

- a) **Maintain operators' flexibility:** Operators need the flexibility to determine the appropriate number of child seats based on their specific passenger demographics and transport scenarios. Mandating a fixed number of CRS and making CRS compulsory in buses and coaches takes away this flexibility and does not consider the individual needs of different operators. In the same manner, manufacturers should not be forced to install built-in CRS in buses and coaches, as this would limit the availability of different options on the market for transport operators that do not transport children. Manufacturers already offer seats designed with safety standards in mind, and transport operators, who are familiar with the specific needs and configurations of their vehicles, can make informed decisions about the placement and number of seats equipped for CRS.
- b) **Provide guidance, not mandates:** Relevant authorities should provide guidance and recommendations for the use of CRS in buses and coaches rather than enforcing a fixed number. If having CRS is deemed necessary, clear and standardised guidance should be provided on the installation of CRS. This can help overcome logistical challenges and ensure a consistent and safe approach across the industry.
- c) **Raise public awareness:** Initiate comprehensive public awareness campaigns to educate passengers about the importance of using seat belts, particularly for children. This can address the leading cause of injury and fatality in buses and coaches, which is often the improper use of the existing belt system.

The commitment of the industry towards passenger safety remains unwavering. IRU advocates for a balanced approach that enhances child safety while considering the unique needs and constraints of the passenger road transport industry.

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