

CTP/BR9056/SMR

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IRU Position Paper on Child Restraint System (child seat) in Coaches

Draft IRU Position Paper on Child Restraint System (child seat) in coaches to be presented at the next IRU Passenger Transport Council meeting dedicated to EU topics (CTP-EU) as Item number III.1.b of agenda CTP-EU/BR9048/SMR

Safe transport of children in coaches

I. IRU POSITION

IRU supports the objective of enhancing the safe transport of children by coach and welcomes the discussions at the United Nations Economic Commission for Europe (UNECE). Even though coaches are already a very safe means of transport, there is still potential that can be exploited to further increase the safety of all passengers. When it comes to the transport of children by coach, there is no requirement for the use of Child Restraint Systems (CRS) or child seats. But, in practice, coach seats typically have a two-point lap belt.

The UNECE's Working Group Safer Transport of Children in Buses and Coaches (IWG STCBC) is exploring the possibility of integrating child seats in coaches. IRU, as the voice of commercial operators, calls for solutions that are made for the coach sector rather than adapting the current child restraint systems that are essentially designed for passenger cars (category M1). In addition, we oppose the idea of mandating a fixed number of child seats in coaches due to their design and diverse usage by transport operators.

Therefore, to harmonise minimum standards and improve the safety of passengers onboard, it is critical to have flexible rules that allow operators to determine the appropriate number of child seats based on their passenger groups.

IRU proposes the following solutions:

- Flexible rules: We strongly recommend a principle-based approach to child seat regulation, enabling operators to decide the required number of child seats based on specific passenger needs. Furthermore, existing coaches should be exempted. Imposing a minimum number of child seats through the proposal will be impractical and unrealistic to implement.
- Education and awareness campaigns: We call for public awareness campaigns by national authorities to promote the use of seat belts in coaches to enhance overall passenger safety.

II. ANALYSIS

UNECE plays a significant role in developing international standards and regulations related to CRS. As a regional commission of the United Nations, UNECE focuses on promoting economic cooperation and integration among its member states, encompassing numerous European countries and others from different regions.

IRU has actively participated in UNECE's Informal Working Group for Safer Transport of Children in Buses and Coaches (IWG STCBC) since 2019. Our main goal is to enhance child safety in coaches, aligning with UNECE's efforts to create safer conditions for the youngest passengers during road travel. Currently, there are discussions regarding whether new coaches should be mandated to include a specific number of child seats.

1. Re-evaluation of compulsory CRS in coaches

Presently, there is no legal requirement for child seats in coaches. Typically, children are secured using two-point lap belts. This practice is widespread, as coaches have a unique design distinct from passenger cars, making it complex to install child seats or CRS in a fixed number of seats. Furthermore, most coach seats do not feature the three-point belt or ISOFIX anchorages that CRS predominantly rely on, as these systems are primarily designed for passenger cars. This creates challenges when adapting them to coaches.

Bus and coach accidents often involve rollovers and frontal collisions, leading to passengers being ejected from their seats. The primary objective of a child seat is to ensure that children remain securely seated and minimise ejection risks, providing to them the same level of protection as adults. Safety studies across various Member States indicate that the current systems are safe, with lower injury rates compared to passenger cars. These studies also highlight that the leading cause of injury and fatality in coaches is the improper usage of the belt system.

Therefore, mandating a specific number of seats for CRS could restrict the overall safety objective set by the industry and deprives innovative safety solutions available to businesses. Furthermore, implementing such a mandate would necessitate extensive changes to bus and coach design and layout, which can be both challenging and costly. Retrofitting existing vehicles to accommodate a specified number of CRS seats poses logistical and operational challenges. For instance, installing child seats requires specific distances from the front seats, potentially resulting in the loss of entire rows of seats, reducing the overall seating capacity in coaches. For instance, it would lead to the loss of four seats in a 55-seat coach. For a 65-seat coach, it would result in the loss of six seats.

With no better safety outcomes and significant costs for operators, this proposal needs to be reconsidered as it could potentially also lead to the perception that coaches are less safe than other modes of transport, which is untrue, as seat belts used in the aviation sector are also typically two-point lap belts.

2. Operators need flexibility due to varying usages

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 may have different demands compared to a charter bus used for group tours. Rarely do the available seats match the number of children being transported.

Moreover, many buses and coaches can serve different purposes simultaneously based on their specifications. Only operators understand the intended use and the number of CRS required for each vehicle. Imposing a rigid CRS mandate on all vehicles may fail to address the diverse needs of different passenger groups, resulting in inefficiencies and inconveniences.

Bus and coach operators require flexibility in managing their businesses and should be able to adapt to changing demands and market conditions. The diversity of passengers and operations makes a one-size-fits-all solution challenging to implement.

As we consider the future of child safety in coaches, it's essential to acknowledge the complex and varied nature of bus and coach transport services. Whether transporting senior citizens to scenic destinations, adults to sporting events, or young schoolchildren on educational outings, each scenario presents unique requirements.

3. IRU's proposed solutions

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

- a) **Flexible rules:** The safe transport of children in child seats and infant carriers needs to be regulated, but the specific number of seats in buses and coaches for each category should not be specified. Prescribing a fixed number of child seats is impractical due to the diverse usage scenarios of buses and coaches. These vehicles often transport age-homogeneous groups, meaning that the need for child seats varies significantly. Operators should have the flexibility to determine the number of child seats based on their specific usage scenarios. For instance, operators transporting children would prioritise child safety, while those transporting adults might choose a less child-friendly vehicle.
- b) **Education and awareness campaigns:** National authorities should initiate comprehensive public awareness campaigns to educate passengers about the importance of wearing seat belts in buses and coaches. These campaigns can include posters, announcements and information materials.

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 transport industry.

III. ACTION