



ZPP'S COMMENT ON LIMITING THE COMPETITION ON THE CHILD RESTRAINT SYSTEMS MARKET

ZPP from its beginning has been completely supportive of free market and free competition. We believe that “creative destruction” is the best way to stimulate the innovation which results in products fitted to the consumers’ needs. Especially now, when European economies are vividly hurt by the coronavirus outbreak, we need to put even more effort into making our regulatory and institutional environment more friendly for the innovative undertakings.

EU’s economical policies are based on a similar approach. The Treaties say explicitly about how the internal market “shall work for the sustainable development of Europe” based on, i.a. highly competitive social market economy. Unfortunately, this objective of developing highly competitive market economy sometimes seems to be slightly disregarded because of the particular interests of influential economic groups defending their status and restricting an access to the market. This is the case we deal with on the child restraint systems market.

Basic and common standards for child restraint systems dedicated for vehicles, are developed by one of the internal agendas working under The United Nations Economic Commission for Europe and contained in UN Regulation No. 44. In December 2019 there was an amendment proposed to the Regulation, explicitly forbidding child restraining systems in the form of belt guides and other sitting devices irrespective of any test results obtained in accordance with current regulation and accepted in all other European national laboratories and authorities. The proposed amendment was indeed aimed against innovative devices letting the parent to adjust the belt to the children’s height, developed as an alternative for bulky and space-taking classical car seats for children. Some of those devices have already passed multiple safety tests and in fact in some cases they may be even safer for the child, than the traditional car seat. What’s more, being sold for the lower price than the seats, those devices are more financially available. Ultimately, if impartial tests show that the device is safe, parents should be able to use a device of their choice – whether it’s a traditional car seat or any other available alternative. Unfortunately, proposed amendment to the regulation contains a strict, blanket ban, completely disregarding the crash test results. We believe that this kind of interference to the market competition is unfair and unacceptable.

Union of Entrepreneurs and Employers

Management board: Cezary Kaźmierczak - President, Marcin Nowacki - Vice-President



Having in mind that the DG GROW in the European Commission is currently working on the mega decision regarding the proposed amendment, we would like to underline how crucial innovations are for the development of European economy. We don't need more regulatory restraints to the market competition, in fact it's absolutely contrary – we need more competitive environment to create better, safer and more available products. Therefore we believe that EU should oppose the subject amendment.

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