



CHILD PASSENGER
SAFETY ASSOCIATION
OF CANADA



L'ASSOCIATION POUR
LA SÉCURITÉ DES ENFANTS
PASSAGERS DU CANADA



Partner Information Package: Proposed Updates to Child Restraint and Vehicle Anchorage Regulations (Transport Canada)

This [consultation](#) is related to proposed updates by Transport Canada to the regulations governing child restraint systems and vehicle anchorages in Canada. If these proposals move forward, they will significantly change how child car seats, booster seats, and certain adaptive restraints are designed, tested, and used in Canada. [Transport Canada and Health Canada are welcoming comments until April 22, 2026.](#)

Proposed changes are expected to modernize Canadian regulations and align more closely with the United States; however, they may also have important implications for child safety, accessibility and real-world use.

Who this package is for

This package was developed to support partners in injury prevention, healthcare, public health and community safety in understanding and responding to the consultation.

Questions? Contact info@cpsac.org

CPSAC is offering a webinar to provide more information for partners.

CPSAC's response to Transport Canada's request for consultation on proposed regulation updates

Friday, April 17 at 10 a.m. PT / 2 p.m. AT

Transport Canada has a proposal to update the regulatory requirements concerning the safety of restraint systems and vehicle anchorages, with a consultation period open through April 22nd. CPSAC has prepared a detailed response and encourages partners and stakeholders to contribute their voice. This webinar will explain CPSAC's response and provide background to support you in preparing your own response. This webinar is open to CPSAC members, and partners in injury prevention, healthcare, public health, children's rehabilitation service providers, and any other interested party.

Register: https://us02web.zoom.us/webinar/register/WN_unOY0E0SSBK12gD35Hx9VA

About child restraint systems

- Child restraint systems (car seats, booster seats, and adaptive restraint systems) are designed to protect infants, children, and youth in motor vehicles.
- Transport Canada: These products must meet federal safety standards under the Motor Vehicle Safety Act, and the Restraint Systems and Booster Seats for Motor Vehicles Regulations (RSSR).
- Health Canada: These products are regulated under The Canada Consumer Product Safety Act (CCPSA), administered by Health Canada to protect the public by preventing dangers to human health and safety posed by consumer products. The sale, loan, or gift of car seats and booster seats falls under this Act and applies to new and used seats.
- Provinces and territories: legislate and enforce how these seats and seat belts are used.

Potential risks and considerations

- Motor vehicle collisions remain a leading cause of injury and death for children in Canada.
- Proper use of appropriate restraints significantly reduces risk of serious injury and death.
- Regulatory changes can influence:
 - What products are available
 - How they can be used
 - Whether they meet the needs of children and families, including those with medical or behavioural needs

Size of the issue in Canada

- Thousands of children are injured in motor vehicle collisions each year.
- Misuse and inappropriate restraint selection remain common.
- Certain populations, especially children with disabilities or complex medical needs, face additional barriers to safe transportation.

What Transport Canada is proposing

Transport Canada is proposing a series of updates to modernize child restraint regulations that align more closely with U.S. standards.

We recognize and value several key intentions within this proposal:

- Maintaining a Canadian regulatory framework
- More closely aligning with U.S. standards where appropriate with the goal of
 - Making Canada's standard safer
 - Maintaining Canada's supply of child restraint systems through reducing barriers to manufacturing products for the Canadian market
- Improving availability of child restraint systems, including adaptive options
- Improving ease of use for caregivers

What you or your organization can do

The consultation period is an opportunity to provide feedback on the proposed regulatory changes. Your feedback can include the following considerations:

- Whether you support the proposed updates
- Potential impacts on safety, accessibility, and real-world use
- Gaps or unintended consequences
- Recommendations for improvement

To participate:

Submit your comments to Transport Canada and Health Canada before **April 22, 2026** (submission details are available at the bottom of the consultation materials [here](#) and outlined further along in this document).

Closing note

This consultation represents a significant opportunity to shape the future of child passenger safety in Canada.

Input from healthcare, injury prevention, and community partners is essential to ensure that regulatory changes:

- Improve safety
- Maintain usability
- Support all children, including those with complex medical and behavioural needs

Proposed Response for Partners

There are two emails to send, one to Transport Canada and to Health Canada. Please see the suggested text below. **You must submit your comments by April 22, 2026**

Email 1: Transport Canada

Email to: RegulationsClerk-ASFB-Commisauereglements@tc.gc.ca

Required subject line: **Updating Child Restraint and Vehicle Anchorage Regulations**

Copy and paste the below into an email and customize as needed. In the introduction to your email, include background information about your experience, role and/or organization, and how you are connected to this issue professionally and/or personally.

We recognize and value several key intentions within this proposal:

- Maintaining a Canadian regulatory framework
- Aligning with U.S. standards where appropriate with the goal of
 - Making Canada's standard safer
 - Maintaining Canada's supply of products through closer alignment
- Improving availability of child restraint systems, including adaptive options
- Supporting ease of use for caregivers

These are important and necessary goals.

However, while we acknowledge the effort and intent behind this proposal, we have identified significant gaps, inconsistencies, and areas requiring clarification. Some of these issues have the potential to negatively impact child safety, access to appropriate restraints, and equity for children with special transportation needs.

We would like to acknowledge several strengths, and express support for the following:

- Increasing the minimum weight to use a forward-facing car seat to 12 kg (26.5 lb)
- Retaining key safety features unique to Canada (e.g., tether use)
- Expanding the definition of disability to align with the federal definition
- Prioritizing access for safe adaptive transportation products for children with disabilities

We have the following concerns:

1. The proposed update to the definition of child restraint system to include booster seats, thereby limiting booster seat weight limits to 36 kg (80 lb). This proposed change:

- is misaligned with the U.S. standards and creates division in the market
 - would prematurely transition children out of a booster seat
 - would increase unsafe belt fit and injury risk
 - disproportionately affects children with higher body weights
 - would result in no legal way for some children to travel in some jurisdictions
2. Updates to regulations for adaptive restraints for infants, children, and youth with disabilities and special transportation needs will not achieve the stated goals of improved access. With the proposed changes as written there is a significant risk that:
- Access will not improve
 - Costs will increase, creating further barriers to access
 - Available options will decrease
 - Safety of available products will become uncertain with removal of the dynamic testing requirement

We strongly recommend that Transport Canada adopt an approach that reduces barriers to accessing adaptive restraints for children with special transportation needs. This could include a simplified pathway for any current U.S.-compliant product to obtain a Canadian NSM, or direct alignment with U.S. adaptive standards to ensure access to safe options.

The needs of these families are immediate. Clear guidance is needed to permit the use of U.S.-compliant products and ensure timely access to safe transportation solutions for all children without delay.

3. We do not support an exemption from the usual pre-publication in the Canada Gazette Part I. Affected groups and interested parties require time to understand implications, consult partners, and provide meaningful input.

Thank you for your consideration,

[your name, organization (if applicable) and contact information]

Email 2: Health Canada

Email to: ccpsa-lcspc@hc-sc.gc.ca

Required subject line: Updating Child Restraint and Vehicle Anchorage Regulations

Health Canada is collecting feedback specifically on how much time companies should have to comply with new mandatory requirements. Copy and paste the below into an email and customize as needed. In the introduction to your email, include background information

about your experience, role, and/or organization, and how you are connected to this issue professionally and/or personally.

Conventional car seats and booster seats:

We support a thoughtful and practical implementation process for conventional child restraints (car seats and booster seats).

Option 1:

Permit the loan, gift, resale, or sale of seats certified to the previous CMVSS version throughout their full manufacturer-stated useful life/expiry period.

Option 2:

Implement a longer transition period (for example, two years or more) to allow for adequate public education, inventory turnover, and stakeholder adaptation.

In either case, we strongly recommend requiring manufacturers to clearly indicate on product labels which version or revision of CMVSS the restraint complies with. This would improve transparency, enforcement, and consumer understanding.

Adaptive restraint systems for infants, children, and youth with disabilities:

Adaptive restraints require an extended transition period through their useful life or expiry date due to their high cost (upwards of \$6,000 in some cases), limited supply, and essential clinical role.

These products are often:

- significantly more expensive than conventional restraints
- produced in small quantities
- purchased through hospitals, rehabilitation centres, charities, or public funding systems
- retained in hospital loaner collections for years
- difficult to replace quickly due to high cost, procurement barriers, and limited supply

Applying standard consumer timelines to adaptive products could unintentionally reduce access for medically vulnerable children and their families.

We therefore recommend that adaptive restraints certified to the previous CMVSS be permitted to be loaned, gifted, resold, or sold throughout their full manufacturer-stated useful life/expiry period unless a clear safety issue exists.

Thank you for your consideration,

[your name, organization (if applicable) and contact information]