

Whole Vehicle Type Approval, conceived to improve safety and cut costs, may have more impact on operators than many realise. Andrew Woolfall explains

# NOT YOUR

**W**hile EC Whole Vehicle Type Approval (ECWVTA) has been in effect since 2009, and impacting on certain types of light goods vehicle since October 2010, it is only in recent months that many operators will have had their first encounter with the scheme. October 2012 saw some larger goods vehicles brought within the process and last month the legislation went on to include 'complete' light goods vehicles. Remaining completed large goods vehicles will be brought within scope during 2014.

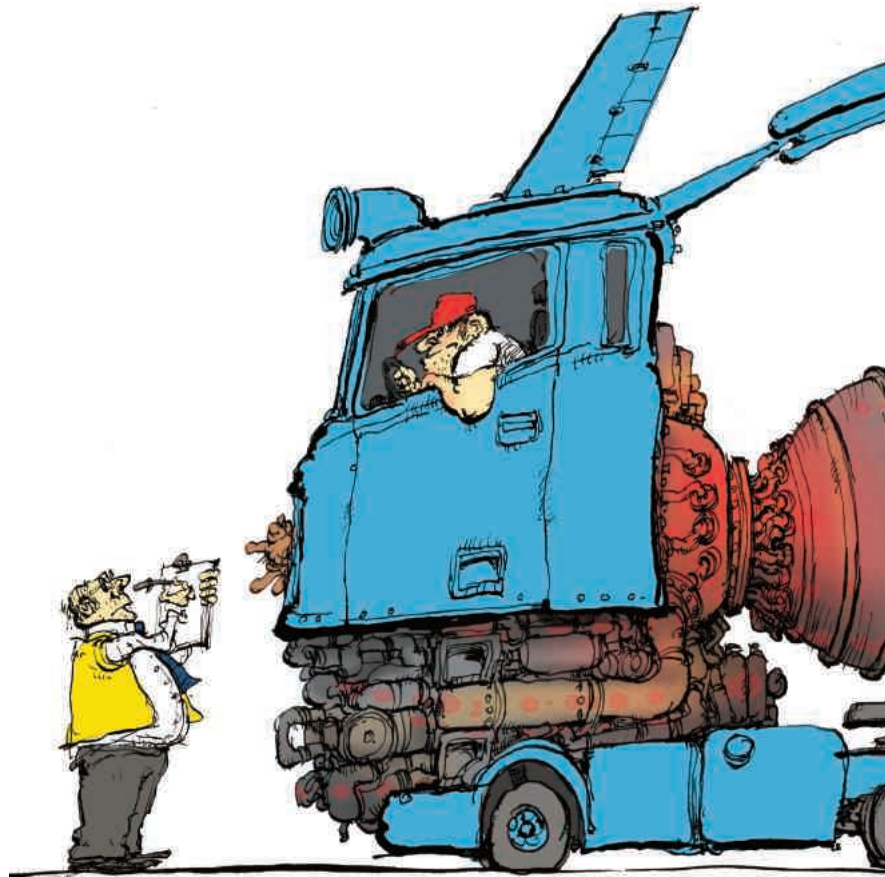
So what does it all mean? Europe-wide type approval schemes have been in place for cars for more than 20 years, but it is only now that commercial vehicles (both goods and passenger-carrying vehicles) are being similarly covered. And while the EC legislation primarily affects the sale of all new commercial vehicles, many operators still fail to understand how the scheme works and its possible impacts directly upon them.

Backtrack a minute: the EC legislation is only one part of a whole new system for type approving new vehicles. The schemes' purposes are a mix of ensuring consistent safety and environmental standards across all new vehicles sold in Europe and – ironically, given some of the criticisms – reducing the cost of putting new vehicles into service.

The idea, now, is that, generally, new commercial vehicles will no longer have to be individually inspected before being allowed on the roads. Once they are covered by the schemes, specimen vehicles will be tested – in the UK, this will be done by the Vehicle Certification Agency (VCA) – and the construction process audited to ensure consistency. As long as both aspects are approved, the vehicle manufacturer will then self certify that identical vehicles meet type approval, thus avoiding the initial test every vehicle would otherwise have to undergo.

The ECWVTA scheme in particular is aimed at manufacturers producing vehicles in substantial numbers. These will now be free to sell approved vehicles in any EU member state: once certified in one EU country, another cannot refuse to register a vehicle, because, by definition, it meets common minimum requirements.

However, where a manufacturer produces smaller numbers of vehicles, two alternative schemes exist in the UK. The first is the National Small Series Type



Approval (NSSTA) scheme, aimed at low volume manufacturers (typically producing less than 500 vehicles of any one type in a year) and who do not sell abroad. Again, a specimen vehicle has to be inspected by the VCA and, if the prototype passes the tests, an inspection will then be made of the production facilities. If these pass, the manufacturer can self certify identical new vehicles in the future. It is anticipated that this process will be simpler and cheaper than the ECWVTA.

One point pertains: both the ECWVTA and NSSTA schemes are looking to ensure consistency of production among almost identical types of vehicle produced by the same manufacturer. Some small deviations among build styles are permitted, but, if these go beyond the permissible limits, the

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# PROBLEM?

manufacturer will have to obtain a new permission. For example, small changes in layout for a panel van might not affect type approval, but building a tipper body, rather than a flatbed, will.

Meanwhile, where a manufacturer produces bespoke vehicles that are effectively one-offs or made in very small numbers, there is a second national scheme: Individual Vehicle Approval (IVA). This requires each vehicle to be tested before being put into service, with testing undertaken by VOSA. Because every vehicle is inspected, there is no need to approve the production process. However, vehicles certified under IVA cannot be sold abroad.

## Problems encountered

Unless an operator has specialist vehicles, which are one-offs or produced in very small numbers, any new vehicles will be subject to either the ECWVTA or the NSSTA schemes. If the vehicle is a standard, direct from the manufacturer, the operator is likely to see very little impact. However, where the vehicle is not constructed in full by one manufacturer, but is instead a 'multistage' build, operators may start to encounter problems.

The issue is that, if, for example, the chassis cab is produced by manufacturer 'A' and a tipper body, or plant or equipment, mounted by company 'B', each stage of manufacturing has to have its own type approval. This might not present a problem for manufacturer 'A', who produces a standard chassis cab. But manufacturer 'B', who produces a range of bodies, will need ECWVTA for each individual style.

This process is both time consuming and costly, and vehicle manufacturers and body builders seem to be blaming each other for problems that might arise. Body builders have been criticised for failing to prepare for ECWVTA, while manufacturers have, in turn, been accused of failing to make necessary data available. Body builders say that, to make the system work, they need seamless access to the chassis manufacturers' type approval information – but this is not being provided.

What is clear is that any new vehicle entering service after its type has been brought within the scope of the new schemes will have to be registered. Without that, its use will be unlawful. It will not, though, be registered, unless all the type approval certificates are in place. This means that, in the early days and weeks of the legislation having

effect, there may be delays in getting vehicles into service. Delivery timescales may be extended and there is the potential for an increase in cost.

So when ordering new vehicles, operators will have to ask whether type approval has been granted for the finished product or applications are still pending. If an operator wants to make changes to the standard vehicle, these may now impact on type approval. It may be that the manufacturer has to obtain a new approval or the operator has to go down the IVA route before the vehicle goes into service. The choice of suppliers and their understanding of the legislation will be critical. If the paperwork is not in place, the vehicle cannot be used on the road.

Many operators, when buying a new vehicle, will also have one eye on its re-sale value and market. Vehicles authorised under ECWVTA can be re-sold anywhere within the EC. However, vehicles put into service on the back of NSSTA or IVA authorisations may have to be re-tested in other countries before registrations are permitted. It can only be safely said that such vehicles use will be lawful, without further adaptation, within the UK – which may have an impact on re-sale values.

Furthermore, operators buying new vehicles from abroad should not assume that, just because they have ECWVTA, their use is lawful in the UK. ECWVTA does not mean that the vehicle complies with construction and use regulations. What is lawful in one country – in terms, for example, of length or width – might not be permissible in another.

The bottom line: ECWVTA clearly impacts mainly on vehicle manufacturers and body builders. Once the relevant application date has passed, they will be unable to sell or register new vehicles covered by the directive, without having the appropriate approval certificates. They may also have to make significant changes to their businesses to comply.

However, the impact on operators remains to be seen and there could well be issues, certainly with regards to price and lead times. So operators should be cautious when accepting delivery of any vehicle that does not have its approvals in place.

Historically, many dealers required operators to register vehicles themselves. Operators should now be wary of agreeing to such a condition and should make any purchase of a new vehicle conditional upon it being properly registered by the seller. **TE**



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