

**White paper: European Community
Whole Vehicle Type Approval (ECWVTA) Regulations**



New regulations impacting on type approval of modifications made to light commercial vehicles under 3.5 tonnes gross vehicle weight come into effect on April 29, 2013.

The European Community Whole Vehicle Type Approval (ECWVTA) regulations apply to N1 category vehicles (up to 3.5 tonnes) from April 29 and N2 panel vans (3.5-12 tonnes) from October 2014.

The Vehicle Certification Agency (VCA) - the UK organisation responsible for Vehicle Type Approval - was originally of the view that all modifications, no matter how minor, would require an individual vehicle approval certificate under the scope of the safety-focused ECWVTA regulations.

However, Department for Transport lobbying by a number of organisations including the VCA as well as the British Vehicle Rental and Leasing Association (BVRLA), the Society of Motor Manufacturers and Traders (SMMT), the Vehicle and Operator Services Agency and aftermarket converters including Venson Automotive Solutions mean that 'minor' van modifications can be treated as part of the vehicle payload and have been exempted from the new type approval regulations.

The SMMT has calculated that the successful conclusion of behind-the-scenes negotiations means major cost savings for businesses and the removal of burdensome type approval administration headache relating to more than 200,000 vans (around 75% of annual registrations) up to 3.5 tonnes and significantly reduced for around 40,000.

John Lewis, chief executive of the BVRLA, said: "If the VCA had gone forward with the original approach it was likely that almost every van put on fleet would need to be individually inspected and approved. We are really pleased that the industry was able to come together and produce a workable solution."

Nevertheless, despite introduction of the concession, known as the "N1 Enhancements Scheme" which governs the modifications that do and do not need type approval, it still means that approximately 20% of modifications - such as a tow bar, fixed light bar or any electrical fitments - require type approval separately to the build of the original manufactured vehicle.

The "N1 Enhancements Scheme"

The scheme is only open to organisations such as Venson Automotive Solutions through its Equip for Service operation, which has obtained Conformity of Production (CoP) clearance from the VCA.

In simple terms that means Venson has had to demonstrate that it has suitable processes, controls and documentation in place to ensure it can build vehicles in conformity with approvals.

Meeting the regulations is an expensive business for converters and it could mean the closure of some converters who will be unable to sell vans without the required certification.

Scheme guidance has been issued in a briefing note from the VCA - <http://www.dft.gov.uk/vca/additional/files/vehicle-type-approval/type-approval-for-goods-vehicles/n1-enhancements-scheme.pdf>.

However, a VCA spokesman said: "Whilst the guidance provides information in relation to common modifications, it cannot be definitive because of the diverse nature of the modifications that may take place.

"Some modification will fall within the scope of the "N1 Enhancements Scheme" but some modifications like simple internal fittings (storage racks, plywood lining, etc.) can be fitted in the load area of panel vans without any need to update the type approval. Items which are subject to type approval, such as additional seating will still require the approval to be updated.

"The guidance will be a living document and VCA will be working with users to update it where appropriate and based on practical experience of operating the scheme."

Although the legislation only applies to new vehicles registered from April 29, 2013 it is estimated it could take at least six weeks to get a conversion through the type approval process so fleet operators have been reminded to think ahead to avoid any delays to putting vehicles on the road which could impact on business efficiency.

Modifications that do and do not need type approval

It is calculated that approximately 20% of modifications will require type approval separately to the build of the original manufactured vehicle.

Modifications for which type approval will still be required despite introduction of the Enhancement Scheme include: the fitting of additional seats or seat alterations, tow bars, cab door lock modifications, fridge units, cranes, tail lifts and front-mounted winches and a range of in-cab modifications such as some hygiene units, ancillary alarm systems, security boxes and storage systems.

To speed up type approval of such items a simplified individual vehicle approval route is being introduced, whereby the body-builder which carries out the modification has their fitting process approved.

This is because while the new ECWVTA regulations are designed to further improve safety, it is not practical to individually test every vehicle produced.

Therefore, one production vehicle is tested to be representative of the 'type'. Once a vehicle is approved, the manufacturer or converter can produce a Certificate of Conformity for each subsequent vehicle of that type.

The VCA guidance says: "Many common modifications - particularly within the load space - which are of a semi-permanent or temporary nature (not welded to the vehicle structure) can generally be treated as part of the vehicle payload. Hence it is not necessary to obtain any specific approval to cover these kinds of modifications.

"Similarly certain temporary modifications on the exterior of the vehicle may be treated in the same way - for example access steps, roof racks/bars etc - such modifications are unlikely to affect the validity of the type approval of the vehicle concerned.

"However, in some cases the modifications carried out by a converter will mean the type approval of the vehicle is no longer valid and so an additional approval is required for the vehicle."

The VCA admits that many modifications fall into a grey area depending on the category of the vehicle, the nature of the modification, the location on the vehicle, the components fitted and so forth. Therefore in some cases where its guidance says 'maybe' type approval is needed it will mean 'yes'."

The VCA provided the example of the fitting of a side mounted carrying rack/glass frail which 'maybe' requires type approval.

The organisation said: "Where such a device protrudes outwards from the side of the vehicle and the relevant front or rear lighting is then more than 400 mm inboard from the edge of the device then the requirements for lighting installation are no longer met.

"In such a case this will mean the original type approval is no longer valid and so the vehicle will require additional lamps to meet the lighting installation requirements. The fitment of the additional lamps will mean the vehicle requires an additional approval in order to be registered in compliance with Motor Vehicles (Approval) Regulations 2009. Clearly the relevance of this example will depend on factors such as the amount of the protrusion of the device and the position of the lamps and so may vary from one type of vehicle to another."

The check list of modifications that may need individual approval runs to many pages so talk to Venson Automotive Solutions for advice.

Further information is available at <https://www.gov.uk/vehicle-approval/overview>.

Penalties for not obtaining vehicle type approval

Best practice advice dictates that public and private sector organisations check that their vehicle converters, like Venson Automotive Solutions, are VCA-approved.

Vehicle owners and operators could face a range of penalties - including fines and jail - if the manufacturer and bodywork builder have not gained the appropriate approval for the individual components and any conversion work.

Operating a vehicle that has not been type approved breaches duty of care and construction and use regulations, which could land vehicle owners and operators in court particularly if involved in a road crash or involved in spot checks.

Additionally, there are penalties outlined in the type approval regulations that apply to the forgery of approval documentation or the making of false statements by converters.

A VCA spokesman said: "Purchasers, funders and operators should ensure that they only buy compliant vehicles."

Venson Automotive Solutions' Equip for Service

Venson Automotive Solutions has its own VCA-approved Equip for Service facilities in York and also offers mobile fitment capability and works in partnership with local dealers.

Employees have the knowledge and experience to provide a bespoke and personalised service for all fleets, regardless of vehicle manufacturer or model of van operated.

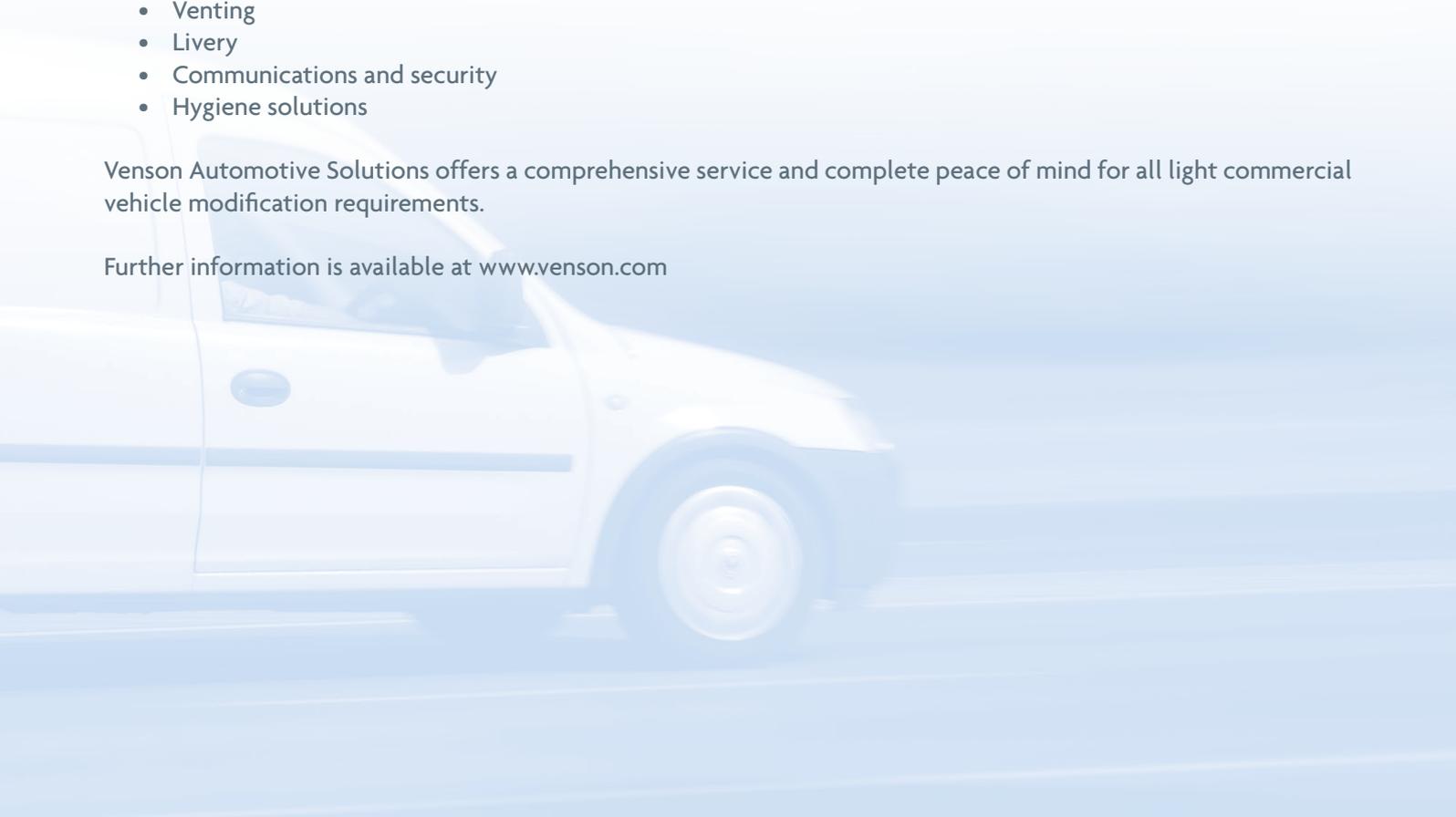
Vehicles can be delivered direct from the manufacturers to the Equip for Service facility. Once the fit out is complete, the van will be delivered ready-for-use.

The comprehensive range of after-market modifications undertaken by Venson includes:

- Vehicle lining
- Storage solutions
- Roof bars, storage tubes and ladder holders
- Tow bars and steps
- Venting
- Livery
- Communications and security
- Hygiene solutions

Venson Automotive Solutions offers a comprehensive service and complete peace of mind for all light commercial vehicle modification requirements.

Further information is available at www.venson.com



To find out more about the financial benefits and operational advantages that working with Venson can deliver to your organisation, contact us on 08444 99 1402 or email: sales@venson.com

The logo for Venson, featuring the word "venson" in a bold, lowercase, sans-serif font. A small blue circle is positioned above the letter "i".

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Get in Touch

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