



RSA

# ROADWORTHINESS TESTING OF MOTOR CARAVANS

## Public Consultation

Vehicle Standards  
31st March 2010

Údarás Um Shábháilteacht Ar Bhóithre  
Road Safety Authority

# **Roadworthiness Testing of Motor Caravans**

**The Road Safety Authority (RSA) is undertaking a review of the roadworthiness testing requirements for motor caravans. As part of this review the RSA is consulting with owners of motor caravans, individuals and organisations who sell and hire motor caravans, the general public and other stakeholder groups who have an interest in the safe operation of these vehicles on Irish roads.**

**Our objective is to ensure that the facilities and requirements for testing motor caravans are appropriate. Your input will be considered and may inform the final policy direction on this matter. We look forward to hearing from you.**

## 1.0 SUMMARY

Every owner and driver is obliged to ensure that their vehicle is roadworthy and in compliance with Road Traffic Law. All vehicles degrade in service and it is key to road safety that vehicle defects are identified and remedied to ensure that the roadworthiness of a vehicle is not comprised. Roadworthiness testing is a preventative measure which helps ensure that vehicles using our roads are in sound working order. It is a mandatory requirement throughout the EU and is governed by EC Directive 2009/40/EC which sets out the requirements for testing of motor vehicles and trailers and only exempts from testing vehicles owned by the armed forces, police and fire services.

In Ireland, vehicle testing is carried out by either the National Car Test Service (NCTS) or the Commercial Vehicle Test Centres (VTN). Passenger cars are tested at NCT and the VTN tests all other vehicles, such as, heavy goods vehicles, light goods vehicles, buses and goods trailers<sup>1</sup>.

Recently, there appears to have been some confusion regarding the testing requirements which apply to motor caravans. The RSA intends to clarify these requirements and this document sets out the following proposals relating to the test arrangements and criteria for motor caravans:

The following testing regime for motor caravans is proposed:

- Motor caravans to continue to be tested in Commercial Vehicle Test Centres as these centres have the most appropriate test facilities for testing vehicles with the physical characteristics of motor caravans.
- The existing fee structure, outlined in the European Communities (Vehicle Testing) (Amendment) Regulations 2007<sup>2</sup>, to apply to motor caravans. The

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<sup>1</sup> S.I. No. 771 OF 2004, European Communities (Vehicle testing) Regulations 2004.

<sup>2</sup> S.I. No. 709 of 2007, The European Communities (Vehicle Testing) (Amendment) Regulations 2007.

fee applicable will depend on the vehicle's DGVW<sup>3</sup> and the number of axles fitted to the vehicle.

- Motor caravans, to be tested on the fourth anniversary of their first registration and thereafter every two years. Annual testing of motor caravans over ten years since first registration would apply after June 2011. Motor caravans tested annually prior to the introduction of the new regulations would have the validity of their Certificates of Roadworthiness extended to bring them into line with the new requirements.
- Motor caravans would not be required to be fitted with a speed limitation device and their operation would not be checked as part of the test.
- Conspicuity Markings are not required on motor caravans and would not be part of the test.
- Motor caravans exceeding 3,500kg DGVW which do not have either a manufacturer's or equivalent plate fitted would be required to undergo plating at an NSAI (National Standards Authority Ireland) approved plating centre. Owners of Motor Caravans not exceeding 3,500kg DGVW which do not have either a manufacturer's or equivalent plate fitted would have to provide the tester with official documentation from the manufacturer or his authorised agent outlining the maximum design axle weights.
- The glazing on a motor caravan would be required to comply with type approval or an equivalent standard as set out in this document.
- Leaking wastewater and/or sewage treatment systems on a motor caravan would be a fail item during the roadworthiness test.

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<sup>3</sup> DGVW (Design Gross Vehicle Weight) means the gross weight of a vehicle laden with the heaviest load which it can reasonably carry having regard to the engine, brakes, tyres and general construction of such vehicle and shall, until the contrary is shown, be taken to be its design gross weight as specified by its manufacturer or, where the design gross weight as specified by the manufacturer is not ascertainable, the design gross weight as specified by an automotive engineer.

## 2.0 BACKGROUND

Road Traffic Law sets out the requirements for all vehicles using Irish public roads including prohibiting the use of a vehicle on Irish roads if it presents a danger to any road user<sup>4</sup>. This law applies in the interest of public safety and to protect road infrastructure.

Our law also require vehicles to be fit for purpose. The periodic roadworthiness test supports this by checking at regular intervals on the components of a vehicle subject to wear and degradation through normal use of a vehicle.

In Ireland roadworthiness testing of vehicles is carried out by the National Car Test Service (NCTS) and the Commercial Vehicle Test Centres or Vehicle Testing Network (VTN)<sup>5</sup>.

The NCT applies to passenger vehicles with up to eight passenger seats and a driver<sup>6</sup>. Vehicles tested at the NCT are tested the fourth anniversary of first registration and every two years thereafter. From June 2011, cars which are over 10 years old will be tested annually. There are 46 NCT test centres located throughout the country.

Vehicles tested in the VTN include goods vehicles, goods trailers, buses and ambulances. These vehicles are tested annually from when the vehicle is one year old. There are circa 146 Commercial Vehicle test centres located throughout the country.

It is an offence to use a vehicle in a public place without either a valid NCT Test Certificate or a Certificate of Roadworthiness. Courts can impose fines of up to €3,000, 3 months imprisonment and up to five penalty points upon successful conviction.

The total number of registered vehicles in Ireland on the 31st December 2009 was 2,467,660<sup>7</sup>. Motor caravans represent the eighth largest vehicle category in the national fleet, numbering 10,294 vehicles. Between 2008 & 2009 the number of motor caravans registered in Ireland increased by 9.45%.

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<sup>4</sup> S.I. No. 190 of 1963, The Road Traffic (Construction, Equipment and Use of Vehicles) Regulations 1963.

<sup>5</sup> S.I. No. 771 of 2004, European Communities (Vehicle Testing) Regulations 2004.

<sup>6</sup> S.I. No. 567 of 2009, Road Traffic (National Car Test) Regulations 2009.

<sup>7</sup> Irish Bulletin of Vehicle & Driver Statistics 2009.

### **3.0 MOTOR CARAVANS – APPROACH TO ROADWORTHINESS TESTING IN THE EU**

Motor caravans are tested throughout the EU under Directive 2009/40/EC. In assessing the test regime for motor caravans, the RSA has considered current best practices in roadworthiness testing, the test facilities available, the vehicle types and testing practices throughout the EC. A survey of how EU Member States deal with roadworthiness testing of these vehicles was conducted. Appendix 1 details the responses received from the Member States surveyed. In summary the main findings from the respondents were:

- all of the respondents require motor caravans to undergo roadworthiness testing.
- the frequency of testing differs. A number of Member States require motor caravans to be tested after four years and every two years thereafter. Some member States require heavier vehicles to be tested more frequently. This is discussed in more detail in section 4.2.
- of the Member States that responded, only Italy & Romania require the fitment of speed limitation devices to motor caravans and only then to those with more than eight passenger seats.
- none of the Member States surveyed require motor caravans to be fitted with conspicuity markings.

### **4.0 PROPOSED TESTING ARRANGEMENTS IN IRELAND**

The main points that require consideration in relation to the roadworthiness testing of motor caravan are:

- appropriate test regime
- frequency of testing
- test items

#### **4.1 TEST REGIME**

Currently motor caravans are roadworthiness tested in the VTN and it is proposed that this will continue to be the case because:

- the facilities at the VTN are better suited to testing motor caravans;
- the entire test can be completed at one location which is more convenient for the customer; and

- customers will only have to pay for one test as, traditionally, outsized vehicles that were tested at NCT had to be referred to the VTN and owners had to pay both fees to both NCT and the VTN.

Furthermore, although the majority of motor caravans are typically built on a light goods vehicles chassis, they do come in a broad spectrum of types and sizes, many of which would be too heavy, long or high to fit on the vehicle lifts used for carrying out the under body inspections in the NCT test lane. In the case of outsize vehicles, usually only part of the test can be completed at the NCT centre with the vehicle undergoing the remainder of the test at a VTN centre. In the past this has increased the cost and also the inconvenience to the customer and, therefore the RSA propose to continue to test all motor caravans at the VTN.

A full breakdown of the fees applicable to motor caravans, based on the vehicle's DGVW and number of axles fitted is detailed in Appendix 2.

## **4.2 FREQUENCY OF TESTING**

For the purpose of roadworthiness testing motor caravans are classed as Category 6 vehicles in Annex I of Directive 2009/40/EC. i.e. 'Motor Vehicles having at least four wheels, used for the carriage of passengers and with not more than eight seats excluding the driver's seat'. The Directive specifies that vehicles in this category must be tested at least on the fourth anniversary of first registration and every two years thereafter. In Ireland, this test frequency currently applies to vehicles tested in the NCT (with vehicles over 10 years required to be tested annually after June 2011).

Table 1 overleaf shows the testing frequency of motor caravans in a number of other EU Member States. In the majority of cases, testing commences after 3 or 4 years and moves to every one or two years thereafter. In Luxembourg, motor caravans over 12,000 kg are tested every six months. In some cases motor caravans with a DGVW of 3,500 kg or more are tested more frequently.

Countries	Frequency (See note below)	
	Under 3,500 kg DGVW	Over 3,500kg DGVW
UK	3/2/1	3/2/1
Austria	3/2/1	3/2/1
Finland	3/2/1	3/2/1
Hungry	4/2/2	4/2/2
Italy	4/2/2	1/1/1
Malta	4/2/2	1/1/1
Netherlands	4/2/2/1 (petrol and Electric) 3/1/1 (diesel)	1/1/1
Romania	2/2/2	1/0.5/0.5
Cyprus	4/2/2	4/2/2
Luxembourg*	3.5/1/1	3.5/1/1 (up to 12,000kg)

\*In Luxembourg motor caravans over 12,000 kg are test every 6 months.

Note; Test dates and frequency are presented numerically. For example 3/2/1 indicates that the first test is when the vehicle is 3 years old, the next test is 2 years later and third and subsequent tests take place annually. Similarly 4/2/2 indicates that the first test is when the vehicle is 4 years old and all subsequent tests are every two years.

**Table 1: Motor Caravan Test Frequencies.**

Based on the less frequent usage and low mileage incurred by motor caravans the RSA is proposing that, in future, motor caravans should be tested on the fourth anniversary of first registration and every two year thereafter until they are 10 years old. Motor caravans which are 10 years or older would be tested annually.

For motor caravans that have been tested prior to the introduction of the proposed new test frequency, provision will be made in the new Regulations for the validity of the Certificate of Roadworthiness to be extended to the date when the vehicles are next due for test under the new system.

#### 4.3 TEST ITEMS

The Design Gross Vehicle Weight (DGVW) of the motor caravan will determine whether it undergoes the Light Goods Vehicle (LGV) test (for vehicles not exceeding a DGVW of 3,500 kg) or the Heavy Goods Vehicle (HGV) test (for vehicles exceeding a DGVW of 3,500 kg). This document highlights the position on the following test items which are of particular interest to motor caravan owners:

- Speed Limitation Devices



- Conspicuity Markings
- National Weights Limit Plates
- Glazing Materials
- Wastewater & Sewage Disposal Systems

#### 4.3.1 SPEED LIMITATION DEVICES

Motor caravans are not required to have speed limiters and, therefore, it is proposed that a vehicle will not fail the test for not having a speed limiter fitted.

#### 4.3.2 CONSPICUITY/REFLECTIVE MARKINGS

Conspicuity or reflective rear and side markings are not required on either cars or buses; therefore it is proposed that motor caravans would not be required to have them fitted either.

#### 4.3.3 VEHICLE WEIGHTS & DIMENSIONS PLATE

Heavy Goods Vehicles (HGV's) must be fitted with a national weights & dimensions plate to facilitate brake performance testing, to ensure that the tyre specifications are appropriate for the loads being carried and to ensure that the axles are not overloaded when presented for test. Light Goods Vehicles (LGV's) do not require a national weights & dimensions plate, however the manufacturers plate is used to verify that the tyre specifications are appropriate for the vehicles maximum design axle weights and to ensure that the axles are not overloaded when presented for test.

The Road Traffic (Construction, Equipment and Use of Vehicles) Regulations<sup>8</sup> require that goods vehicles and trailers with a DGVW exceeding 3,500 kilograms or passenger vehicles having accommodation for more than eight passengers exclusive of the driver, having a DGVW exceeding 5,000 kilograms be fitted with national weights limits plates ("authorisation plate").

In the case of motor caravans, it is proposed that only those with a DGVW exceeding 3,500 kilograms which do not have either a manufacturer's or equivalent plate fitted would be required to undergo plating at an approved NSAI workshop. However, it must be noted that NSAI plating centres can only

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<sup>8</sup> S.I. No. 190 of 1963, The Road Traffic (Construction, Equipment & Use of Vehicles) Regulations 1963, as amended.

plate vehicles on receipt of written confirmation from the vehicle manufacturer or his authorised agent outlining a vehicle's DGVW. A list of approved plating centres is available from the NSAI on +353 1 807 3800.

Motor caravans with a DGVW not exceeding 3,500kg which are not fitted with a manufacturer's or equivalent plate would not need to undergo plating at an approved NSAI workshop. However owners would need to provide vehicle testers with written confirmation from the vehicle manufacturer or his authorised agent detailing the vehicle's maximum axle weights.

#### 4.3.4 GLAZING MATERIALS

Motor vehicles registered on or after 1st January 1986<sup>9</sup> must be fitted with windscreens made from laminated safety glass and marked to UNECE Regulation 43, E-marked 43R.

Alternatively they may be marked to one of the following British Standards; B.S. 857-2 or B.S. 5282 or B.S. AU 178 or an equivalent standard as shown in Table 2 overleaf and detailed in the Vehicle Testing Manuals.

The Vehicle Testing Manuals also state that where windscreens, side or rear windows, are fitted with glazing material other than safety glass, the vehicle owner shall provide a certificate from the manufacturer or installer stating that the glazing material is not likely, if fractured, to produce fragments capable of causing severe cuts.

Issues have arisen in the past, where the markings affixed to the glazing were not evident on examination by the vehicle tester, and it has proven difficult for owners to provide certification to the standards above, particularly in the case of vehicle manufacturers/converters that are no longer in business. In such instances it may be necessary for the vehicle to be re-glazed with material meeting the standards specified above.

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<sup>9</sup> S.I. No. 158 of 1985, The Road Traffic (Construction, Equipment and Use of Vehicles) (Amendment) Regulations 1985.

Country	Safety Glass Standard
Australia:	AS/NZS 2080 AS/NZS 2080T
Canada:	CMVSS 205 (C2)
India:	IS2553 (Part 2) 1992 (Note 11)
Japan:	11-4-21 (window glass) JISR 3211
South Africa:	SABS 1191 / SABS 1193
UK:	BS AU I78 / BS 85 7-2 / BS 5282
USA:	FMVSS 205 (U)

**Table 2:** Acceptable safety glass standards.

#### 4.3.5 WASTEWATER & SEWAGE DISPOSAL SYSTEMS

Road Traffic Regulations<sup>10</sup> prohibit the discharge of the contents of any closet, urinal, lavatory basin or sink that is attached to a vehicle or trailer to leak onto a public road. Hence, motor caravans presented for testing must ensure that both the wastewater and sewage disposal systems, where fitted, are not leaking. [Note: gas appliances such as cookers and heaters would not be included in the test]

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<sup>10</sup> S.I. No. 190 of 1963 The Road Traffic (Construction, Equipment & Use of Vehicles) Regulations 1963, as amended.

## **5.0 YOUR COMMENTS**

The RSA wishes to hear from all road users, interest groups and others who have views, advice and suggestions on the policy options available in relation to the roadworthiness testing of Motor Caravans. The consultative process commences on 31st March 2010 and lasts until 12th May 2010. Comments should be e-mailed to [motorcaravanconsultation@rsa.ie](mailto:motorcaravanconsultation@rsa.ie) or posted to:

Motor Caravan Consultation  
Vehicle Standards  
Road Safety Authority  
Moy Valley Business Park  
Primrose Hill  
Ballina  
Co Mayo

This document will also be posted on the Road Safety Authority Website, [www.rsa.ie](http://www.rsa.ie)

## APPENDICES - APPENDIX 1

Summary of Responses received from other EU Member States in relation to questions posed by the RSA on the Periodic Roadworthiness Testing Requirements of Motor Caravans.

QUESTION POSED	MEMBER STATES SURVEYED									
	AUSTRIA	CYPRUS	FINLAND	HUNGARY	ITALY	LUXEMBOURG	MALTA	NETHERLANDS	ROMANIA	UK
Are Motor Caravans required to undergo periodic roadworthiness testing?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
If yes, what is the frequency of testing for Motor Caravans?	DGVW ≤ 3,500kg = 3/2/1 DGVW > 3,500kg = 1/1/1	4/2/2 (Regardless of DGVW)  Considered Category M1 Vehicles	3/2/1 (Regardless of DGVW)  Considered Category M1 Vehicles	4/2/2 (Regardless of DGVW)  Considered Category M1 Vehicles	DGVW ≤ 3,500kg = 4/2/2 DGVW > 3,500kg = 1/1/1  Considered Category M1 Vehicles	DGVW ≤ 12,000kg = 3.5/1/1 DGVW > 12,000kg = 0.5/0.5/0.5	DGVW ≤ 3,500kg = 4/2/2 DGVW > 3,500kg = 1/1/1	DGVW ≤ 3,500kg = 4/2/2/1 (For petrol & electric vehicles) & 1/1/1 (For diesel & gas Vehicles) DGVW > 3,500kg = 1/1/1 (For all vehicles)	Category M1 = 2/2/2  Category M2 & M3 = 1/0.5/0.5	3/2/1 (Regardless of DGVW)
Are Motor Caravans required to be fitted with a speed limitation device?	No	No	No	No	On Category M2 & Category M3 Vehicles Only	No	No	No	On Category M2 & Category M3 Vehicles Only	No
Are Motor Caravans required to be fitted with conspicuity markings?	No	No	No	No	No	No	No	No	No	No
Are any additional items, specific to Motor Caravans tested (i.e. the gas installation etc)?	The gas installation is tested	No	Visual inspection of the gas installation, dry powder fire extinguisher, electrical devices & ventilation system.	No	No	No	No	No	No	No

## APPENDIX 2

Test fees for Motor Caravans based on DGVW (Design Gross Vehicle Weight). Fees are in alignment with the European Communities (Vehicle Testing) (Amendment) Regulations 2007, S.I. No. 709 of 2007.

<b>Vehicle DGVW</b>	<b>Test Fee (exclusive of vat)</b>	<b>Retest Fee (exclusive of vat)</b>	<b>Certificate of Roadworthiness Fee<sup>11</sup></b>	<b>Replacement Certificate of Roadworthiness Fee</b>
3.5 tonnes or less	€70.86	€35.43	€6.00	€3.00
3.5 to 7.5 tonnes	€94.52	€47.26	€13.00	€7.00
7.5 tonnes or greater with 2 axles	€118.16	€59.08	€13.00	€7.00
7.5 tonnes or greater with 3 axles	€147.67	€73.83	€13.00	€7.00
7.5 tonnes or greater with 4 or more axles	€165.38	€82.69	€13.00	€7.00

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<sup>11</sup> A 'Certificate of Roadworthiness' (CRW) can only be obtained from Local Authority Motor Tax offices on presentation of a 'Pass Statement' from an authorised Commercial Vehicle Test Centre.

# Working To Save Lives

## Údarás Um Shábháilteacht Ar Bhóithre Road Safety Authority

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