

Bus, Mini-Bus and LGV Type Approval Leaflet

From October 29th 2011

NO APPROVAL – NO SALE

The 29th of October 2011 is an important upcoming date for the registration of new buses, mini-buses and light goods vehicles (LGV's) in Ireland. From 29th of October 2011 onwards, all NEW buses and mini-buses must have proof of approval before the Revenue Commissioners will register the vehicle for use on Irish roads. From the 29th of October 2011 onwards, LGV's manufactured in a single stage will also require approval in order to be registered in Ireland. Note wheelchair accessible M2 and M3 vehicles are not considered to be special purpose vehicles and so require approval from the mandatory dates of the normal M2 and M3 vehicle categories

Reasons for Change

Due to safety, environmental, and trade reasons, the European Union has set harmonised construction standards for new road vehicles. Any vehicle that has been approved to these standards can be registered and used in any country within the European Union. This is known as *European Community Whole Vehicle Type Approval* or, in short, ECWVTA.

Since 1998 all new cars have been required to have ECWVTA in order to be registered. Now ECWVTA is being extended to vehicles of other categories. (This is the result of Directive 2007/46/EC, which will require ECWVTA for all road vehicles and their trailers by October 2014).

ECWVTA is an onerous and costly route to approval, whose main advantage is to manufacturers selling their vehicles across Europe. For manufacturers whose markets are mainly within Ireland, (or Ireland and another EU Member State) then an NSSTA (National Small Series Type Approval) or IVA (Individual Vehicle Approval) approval is more appropriate. (ECWVTA, NSSTA, and IVA will be explained in more detail later.)

Since October 2010, buses manufactured in a single stage have required approval in order to be registered. From the 29th October 2011 **all** NEW buses will have to have an ECWVTA or NSSTA or IVA in order to be registered. Also from 29th October 2011, LGV's manufactured in a single stage will require approval in order to be registered.

Appendix 1 to this leaflet lists the dates from when approval will be obligatory for vehicles of various categories before they can be sold or enter into service and also defines the various categories of vehicles involved.

Upcoming Approval dates affecting buses and LGV's

*In order to be sold or registered, New Complete or Incomplete buses (M_2 and M_3) have required proof of approval since **29th October 2010**.*

*In order to be sold or registered, ALL New Buses (M_2 and M_3) must have proof of approval from **29th October 2011**.*

*In order to be sold or registered, New Complete or Incomplete LGV's ($N1$) will require proof of approval from **29th October 2011**.*

*In order to be sold or registered, ALL New LGV's ($N1$) will require proof of approval from **29th April 2013**.*

A '**complete vehicle**' is a vehicle which has been manufactured in a single stage by one manufacturer. It requires no further work prior to registration, and an example of this would be a mass produced van (or bus), in a finished condition. One manufacturer makes the whole vehicle and sells it as a **complete** vehicle.

An '**incomplete vehicle**' is any vehicle which must undergo at least one further stage of completion before it can be considered a completed vehicle. An example of this would be a chassis cab which does not have a body attached.

A '**completed vehicle**' is a vehicle which has undergone a multi-stage type approval process involving more than one manufacturer. An example of this would be a bodybuilder who imports a chassis cab and assembles a body so that the **completed** vehicle requires no further work and is in a finished condition.

'**Multi-stage build**' allows proof of approval to be given for a vehicle during its stages of build. An example would be a bus built in stages by different manufacturers. For example, the first manufacturer manufactures a bus chassis and the second manufacturer adds the box body. Each manufacturer involved supplies the relevant approvals applicable to them to the next manufacturer, when the vehicle is completed the final manufacturer submits the approvals from the previous manufacturers, along with their own approvals to the approval authority for a multi-stage approval. This multi-stage approval covers the vehicle in its entirety including the previous stage approvals.

Sometimes a complete vehicle, such as a panel van, is converted into a bus. One manufacturer sells the **complete** van. The second manufacturer carries out the conversion and sells the **completed** bus. In such case, it is important that the second stage manufacturer sources a van that is suitable to be converted into a bus. For example, a van which is fitted with ABS must be sourced because this is a

mandatory requirement for a bus but not for an LGV (however many LGV are fitted with ABS as standard).

What proof of approval will the Revenue Commissioners need to register a vehicle?

Buses and Mini Buses (M2 and M3)

Since the **29th October 2010** a new **complete** bus (EU vehicle category M2 or M3) has required approval in order to be registered in Ireland. An EC Certificate of Conformity or Irish NSSTA Certificate of Conformity for a **complete** bus or an Irish IVA Certificate for an M2 or M3 has been required at the time of registration.

From **29th October 2011** a new **completed** bus (M2 or M3) will require approval before it can be registered. An EC Certificate of Conformity or Irish NSSTA Certificate of Conformity for a **completed** M2 or M3, or an Irish IVA Certificate for an M2 or M3 must be produced at the time of registration.

Light Goods Vehicles (N1)

From **29th October 2011** a new **complete LGV** (EU vehicle category N1) will require approval before it can be registered. An EC Certificate of Conformity or Irish NSSTA Certificate of Conformity for a **complete** N1 or an Irish IVA Certificate for an N1 must be produced at the time of registration.

From **29th April 2013** a new **completed LGV** (N1) vehicle will require approval before it can be registered. An EC Certificate of Conformity or Irish NSSTA Certificate of Conformity for a **completed** N1, or an Irish IVA Certificate for an N1 must be produced at the time of registration.

Proof of approval will be issued by the manufacturer of the vehicle for ECWVTA or Irish NSSTA or by the NSAI (National Standards Authority of Ireland) for an Irish IVA.

It will be easy for both the applicant and registration personnel to recognise the different proofs of approval as each certificate has **complete**, **completed**, **incomplete**, or **Individual Vehicle Approval** in the title of the document. (In Ireland an **incomplete** vehicle cannot be registered, but can be sold by one manufacturer for completion by another manufacturer.)

I am a Manufacturer. How can I get proof of approval?

Manufacturers will need to apply for approval to an Approval Authority. There is an Approval Authority in each of the Member States of the European Union. The names and addresses of all of these Approval Authorities can be found at the following link [>>>](#)

The **National Standards Authority of Ireland (NSAI)** is the Irish appointed approval authority and is responsible for issuing National Small Series Type Approval (NSSTA) and Individual Vehicle Approval (IVA) for vehicles in Ireland. The NSAI has established a network of Appointed Test Centre's (ATC) who physically examine and issue test reports for some or all of the technical requirements. These test reports are then used by NSAI to grant the vehicle or trailer approvals.

For full ECWVTA the Approval Authority in any country in Europe can be used.

What kind of proof of approval will I get if I am a Manufacturer?

Once approval has been granted by the approval authority, the manufacturer will get an *Approval Certificate*. It will either be an ECWVTA, or an Irish NSSTA, or an Irish IVA.

In order to facilitate registration at the offices of the Revenue Commissioners, when selling a vehicle you (the manufacturer) are required to give the buyer a Certificate of Conformity if that type of vehicle has been checked to ECWVTA or Irish NSSTA, or pass on the Irish Individual Vehicle Certificate if that vehicle has been individually checked. For Irish NSSTA approvals, copies of the CoC must also be sent to NSAI which are subsequently verified by the Revenue Commissioners.

To legally issue a *Certificate of Conformity* you will need to ensure that each vehicle sold is the same type as the vehicle originally approved. This will mean cooperating with the approval authority to confirm that the production conforms to that type. This is known as *Conformity of Production*. The *Conformity of Production* requirements will be agreed with the approval authority as part of the type approval procedure. There is no *Conformity of Production* requirement for individual vehicle approval.

I am a buyer. How can I get proof of approval?

Certificates confirming proof of approval will be issued by the manufacturer of the vehicle for ECWVTA or Irish NSSTA or by the National Standards Authority of Ireland for Irish IVA. In order to register a new vehicle after the mandatory dates of approval (Appendix 1), the Revenue Commissioners will require this certificate confirming proof of approval.

What kind of proof of approval will I get if I am a buyer?

If the vehicle has been checked to ECWVTA or Irish NSSTA then the proof of approval you will get is a *Certificate of Conformity*. A *Certificate of Conformity* will say that the vehicle you have bought has been built to the same standards as a vehicle that was checked thoroughly to all the standards. This first vehicle was Type Approved. All other vehicles produced can be registered if they are considered to be the same **type** as the vehicle thoroughly tested.

If the vehicle has been checked to Irish IVA then the proof of approval you will be given is an Irish *Individual Vehicle Approval Certificate*. Each vehicle is checked individually.

What if I have a new vehicle that does not have proof of approval?

After the mandatory dates a manufacturer must provide a buyer with proof of approval.

If you have a new vehicle for which the manufacturer cannot give you proof of approval, such as a new vehicle made for sale in a country outside the European Union, it may be that you, or the manufacturer, dealer, or importer, could get an Irish IVA (*Individual Vehicle Approval*). NSAI would need to be contacted to see if this was possible.

What if I have a NSSTA or IVA certificate from another country?

NSSTA or IVA certificates from other countries in Europe are not automatically accepted in Ireland and you should contact the NSAI in order to establish whether the approvals granted are considered equivalent or whether further tests are required for example.

What if the manufacturer is not in Ireland?

Many vehicles used in Ireland are not manufactured in Ireland. In this case the Irish dealer or importer will give the proof of approval to the buyer. The dealer or importer will not issue the proof of approval. The dealer or importer will forward the proof of approval from the manufacturer.

I am a body builder (or vehicle converter). Am I a manufacturer and if so, how do I get a proof of approval for the work I do to convert a vehicle to be a bus?

As you are completing part of the vehicle build and you have responsibility for the safety or environmental acceptability of the construction of the vehicle, you are considered to be a manufacturer. As a manufacturer you can apply to the NSAI for Irish national approval or to any Approval Authority in any Member State of the European Union for ECWVTA.

However, if you are only a subcontractor for the work on the vehicle then you are not a manufacturer as you are not responsible for the safety or environmental acceptability of the construction of the vehicle. The person who subcontracts you is. That person will be the manufacturer and therefore he/ she should contact the approval authority.

I am a body builder (or vehicle converter). I do not make the brakes, tyres, lights..... How can I take responsibility for the safety of brakes, tyres, lights.....?

You will only need to take responsibility for those parts of the vehicle that you have modified. The parts that you do not modify will not need to be checked, because they were examined when the vehicle you bought was given an **incomplete vehicle** approval. However certain modifications will alter the approvals of the base vehicle. If you add an axle for example then tests will be required to be carried out on the braking devices of the vehicle, also the tyres on the new wheels added will have to have had component approval, etc. The body builder or converter will need to understand whether the work they carry out affects the validity of the approvals issued at an earlier stage. The exchange of information is very important during the multi stage build process and body builders and converters will generally require access to the base vehicle manufacturer's approval information.

NSSTA or IVA certificates from another country, or no certificate, may require checking of the whole vehicle before you can get a certificate.

I only want to sell my bus in Ireland and UK. Do I need different proof of approval for each country?

If your vehicle has ECWVTA you will not need separate approvals for each country.

If your vehicle has an Irish NSSTA or IVA then you will need to contact the registration authorities in the Member State where you wish to register the vehicle in order to establish whether or not the Irish approval is acceptable in their jurisdiction. The approval certificate will be examined for equivalency with the requirements of the Member State where you wish to register the vehicle. Unless the relevant authorities determine that the national approval requirements for their country have not been met, then registration will be granted.

The RSA are actively pursuing mutual recognition arrangements with our counterparts in the UK. Although there is currently no formal mutual recognition arrangement currently in place, a great similarity exists between the NSSTA and IVA technical specifications in both jurisdictions. This should reduce the barriers to acceptance and reduce the cost of achieving approval in the UK for vehicles which have successfully achieved approval in Ireland (and vice versa).

Why should I choose to get an ECWVTA certificate?

If you want to sell the same type of new vehicle outside Ireland as well as inside Ireland then a full ECWVTA certificate may be the best commercial decision for a manufacturer.

A full ECWVTA certificate will allow registration in any other country in Europe (as long as special conditions, such as needing to have a speedometer also in miles per hour in the UK and having the dipped headlights pointing in the correct direction, are met) without further checking in that country.

For a complete vehicle these checks are very expensive and time consuming including testing in specific locations and with specific equipment by organisations known as Technical Services. Before production can begin examples of the type of vehicle will need to be tested. In some cases vehicles will be destroyed during testing. The manufacturer will also need to keep records to prove that all the production vehicles are the same as those vehicles tested before production began.

If you are completing a vehicle the checks may be less expensive as only the modifications will need to be checked if the checks for the rest of the vehicle are still valid. However, the checks will need to be done at Technical Services.

NSAI, or the Approval Authority in any of the countries in Europe, can help you with that decision.

Why should I choose to get a National Small Series (NSSTA) certificate?

If you want to sell the same type of new vehicle in Ireland only, or in another country in Europe only, then a NSSTA certificate may be the best commercial decision for a manufacturer. The NSSTA scheme is less expensive and administratively less onerous than ECWVTA and where appropriate, alternative technical requirements apply. There are also reduced Conformity of Production (CoP) requirements.

If you are completing a vehicle, only the modifications will need to be checked if the checks for the rest of the vehicle are still valid. The checks will need to be done by organisations specified by the Approval Authority. These organisations are likely to be less expensive and more locally based than Technical Services.

However, the numbers of vehicles of the same type that can be sold is limited. For buses in Ireland this is 250 per year per type and LGV's are limited to 500. See Schedule 4 of S.I. No. 158 of 2009 for limits for other vehicle categories.

The NSAI, or the Approval Authority in any of the countries in Europe you want to sell the vehicle, can help you with the decision.

Why should I choose to get an Individual Vehicle Approval (IVA) certificate?

If you are involved in importing or manufacturing vehicles in very small numbers or as individual vehicles then the IVA scheme may be the best commercial decision for you. Under the IVA scheme, each vehicle is individually checked. The technical requirements associated with IVA are less onerous than those of NSSTA or ECWVTA and there are no conformity of production requirements. Once a vehicle passes an IVA inspection, an Individual Vehicle Approval Certificate is issued which allows the vehicle to be registered in Ireland. There is no limit to the number of vehicles that can be sold. However each vehicle is checked so the cost of checking each vehicle of the same type may result in a total cost that is more than the cost of getting a NSSTA certificate.

NSAI, or the Approval Authority in any of the countries in Europe, can help you with that decision.

As a manufacturer, how much will national approval (NSSTA or IVA) cost?

The fees for approval work are charged based on the amount of time taken to carry out the administrative work and also based on the amount of testing involved. However, the NSAI will try to provide an estimate for the costs involved, once the scope of work has been agreed with the manufacturer.

Where do I get more detailed information and advice?

The NSAI and the RSA can provide more information relating to vehicle type approval and the Revenue Commissioners can be contacted in relation to vehicle registration.

National Standards Authority of Ireland - NSAI

The NSAI (National Standards Authority of Ireland) is Ireland's appointed Approval Authority and are responsible for issuing all national approvals (IVA or NSSTA) for vehicles in Ireland. For more information on the routes to approval, please visit the NSAI website www.n sai.ie and navigate your way through to type approval information. Alternatively click on the following link >>>>.

If you need further information you can email julie.elliott@nsai.ie or amanda.oshea@nsai.ie and you can phone 01-8073919 or 01-8073832.

Road Safety Authority - RSA

The RSA website contains further information on the type approval process and including; FAQ's, implementation dates and links to the relevant legislation and 2007/46/EC. Please visit the RSA website at www.rsa.ie and navigate your way through to vehicle type approval. Alternatively click on the following link >>>> If you need further information you can email ecwvta@rsa.ie or phone 096-25040 or 096-25014. Copies of an interactive CD, issued originally in January 2009, are still available on request.

Revenue Commissioners

The Revenue Commissioners are Ireland's vehicle registration authority. Please visit Revenue's website at www.revenue.ie for further information relating to first registration of vehicles or importing of vehicles.

APPENDIX 1

Mandatory compliance dates For ECWVTA and its related national approval schemes

| Category | Date for obligatory approval for vehicles entering into service |
|--|--|
| M ₁ | 29 Apr 2009 |
| Incomplete and complete vehicles of categories M ₂ , M ₃ | 29 Oct 2010 |
| Completed vehicles of categories M ₂ , M ₃ | 29 Oct 2011 |
| Incomplete and complete vehicles of category N ₁ | |
| Special- purpose vehicles of category M ₁ | 29 Apr 2012 |
| Incomplete and complete vehicles of categories N ₂ , N ₃ , O ₁ , O ₂ , O ₃ , O ₄ | 29 Oct 2012 |
| Completed vehicles of category N ₁ | 29 Apr 2013 |
| Completed vehicles of categories O ₁ , O ₂ , O ₃ , O ₄ | 29 Oct 2013 |
| Special- purpose vehicles of categories N ₁ , N ₂ , N ₃ , M ₂ , M ₃ , O ₁ , O ₂ , O ₃ , O ₄ | 29 Oct 2014 |
| Completed vehicles of categories N ₂ , N ₃ | |

Category M:

Motor vehicles with at least four wheels designed and constructed for the carriage of passengers.

Category M1: Vehicles designed and constructed for the carriage of passengers and comprising no more than eight seats in addition to the driver's seat.

Category M2: Vehicles designed and constructed for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum mass not exceeding 5 tonnes.

Category M3: Vehicles designed and constructed for the carriage of passengers, comprising more than eight seats in addition to the driver's seat, and having a maximum mass exceeding 5 tonnes.

Category N:

(Motor vehicles with at least four wheels designed and constructed for the carriage of goods)

Category N1: Vehicles designed and constructed for the carriage of goods and having a maximum mass not exceeding 3.5 tonnes.

Category N2: Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 3.5 tonnes but not exceeding 12 tonnes.

Category N3: Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 12 tonnes.

Category O:

Trailers (including semi-trailers).

Category O1: Trailers with a maximum mass not exceeding 0.75 tonnes

Category O2: Trailers with a maximum mass exceeding 0.75 tonnes but not exceeding 3.5 tonnes.

Category O3: Trailers with a maximum mass exceeding 3.5 tonnes but not exceeding 10 tonnes.

Category O4: Trailers with a maximum mass exceeding 10 tonnes.

Note; for further details on definition of vehicle categories and types (e.g. off-road vehicles), please see ANNEX II of the Recast Framework Directive (2007/46/EC). This document can be downloaded from the RSA website (www.rsa.ie).