

22nd November 2010

Motor Caravan Roadworthiness Testing

Dear stakeholder,

I write further to the recent public consultation on the roadworthiness testing of motor caravans.

Having considered the feedback, the Road Safety Authority completed its review and made recommendations which have been approved by the Minister for Transport. I am attaching for, your information, a note setting out the new test arrangements for Motor Caravans. The new arrangements will be underpinned by new regulations¹ which should come into effect early in 2011. However, as motor caravans are already required to have a roadworthiness certificate, motor caravan owners should continue to have their vehicles tested at the VTN in the interim.

It should be noted that these new arrangements apply only to motor caravans used solely for the carriage of passengers. Vehicles which have been registered and / or taxed as motor caravans, but, which have been designed primarily for the carriage of goods, such as animal transporters, will continue to be tested and charged as goods vehicles. They are already required to undergo an annual roadworthiness test at the VTN, and where applicable be fitted with a speed limiter, tachograph, conspicuity markings, side and rear underrun, wide angle and close proximity mirrors etc and have their brakes tested on the basis of the vehicle's Design Gross Vehicle Weight (DGWV).

If you have any queries please contact us on 096 25014 from 9:00 a.m. to 5.30 p.m. Monday to Friday or by email at vehiclestandards@rsa.ie

Yours sincerely

Vehicle Standards
Road Safety Authority
Moy Valley Business Park
Primrose Hill
Ballina
Co. Mayo

¹ S.I. No. 771 of 2004: The European Communities (Vehicle Testing) Regulations 2004.

Information Note

NEW TESTING ARRANGEMENTS

Motor caravans used for the carriage of passengers

1. Test Regime – Motor caravans to be tested at VTN

- Motor caravans will continue to be tested in Vehicle Testing Network (VTN) test centres as these centres have the most appropriate test facilities for testing vehicles with the physical characteristics of motor caravans. Motor caravans with a DGVW exceeding 3,500kg must be tested in a HGV test lane and motor caravans with a DGVW not exceeding 3,500kg must be tested in an LGV test lane.

Outsize vehicles tested at NCT have traditionally had to do part of the test at NCT and part of the test at the VTN and have had to pay for both.

- Motor caravan owners should continue to go to their local Motor Tax office to exchange the Pass Statement issued by the VTN test centre for a Certificate of Roadworthiness. This is a temporary requirement as a centralised system for issuing roadworthiness certificates will be introduced by the RSA for all vehicles tested at the VTN in the near future.

2. Test Frequency – 4:2:2:2:1 (as for NCT)

- In line with the test frequencies currently applicable to vehicles tested at NCT, motor caravans will be tested on the fourth anniversary of first registration and thereafter every two years. Annual testing of motor caravans that are over ten years old will apply after June 2011. This is in line with the impending introduction of annual testing of cars at NCT that are over ten years old from June 2011. Motor caravans used for the carriage of goods, i.e. incorrectly classified animal transporters, will continue to be tested as goods vehicles every year.

3. Test Fee

- The fee for testing of motor caravans is to be linked to the fee for testing a Light Goods Vehicle (LGV) on the basis that the test for both categories of vehicles is similar. The fee structure also takes into account the number of axles fitted to a vehicle which have a significant impact on the length of the test. Accordingly,
 - Motor caravans with two axles, irrespective of their Design Gross Vehicle Weight (DGVW) will be charged **€70.86** plus VAT (VAT rate currently 21%). This is equivalent to the LGV test fee.
 - Motor caravans with three or more axles, irrespective of their DGVW will be charged an additional 25% because of additional checks on wheel bearings, tyres, suspension, and brake components on the extra axle or axles bringing the fee to **€88.58** plus VAT (VAT rate currently 21%).

4. Speed Limitation Devices & Conspicuity Markings

- Motor caravans will not be required to be fitted with a speed limiter or conspicuity markings.


5. Plating

- Motor caravans, irrespective of their DGVW will not have to undergo plating at an NSAI approved plating centre. However the tester will need to know the vehicle's DGVW and maximum axle weights and this can be found on the manufacturer's VIN plate.
 - In the absence of a manufacturer's plate being fitted to an unmodified motor caravan, which is most unlikely, it will be sufficient for the owner to provide the tester with written confirmation from the original manufacturer detailing the vehicle's maximum permissible DGVW and axle weights.
 - In cases where a vehicle has been modified since first registration and the manufacturer's plate has been removed or its data modified; the owner will have to provide the tester with written confirmation from the original vehicle manufacturer detailing the vehicles original axle weights and procure the services of an automotive engineer to examine the vehicle and approve the modification in writing and detail the vehicle's new DGVW and axle weights.

6. Glazing Materials

- The glazing materials used in motor caravans will be required to meet one of the standards from the list of acceptable standards compiled by the RSA which covers glazing fitted to motor caravans going back 25 years. We are aware that there are a number of vehicles, including numerous older motor caravans that have non-glass glazing fitted in side, rear or roof windows. The following glazing standards have been deemed acceptable for roadworthiness testing.
 - Glazing E-marked to UNECE Regulation 43, marked (En)43R where *n* is the country code where the glazing was type-approved.
 - Any of the following standards. These have been verified as equivalent to UNECE Regulation 43.

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 178 / BS 85 7-2 / BS 5282
USA:	FMVSS 205 (U) ANSI/SAE Z26.1-1996 (Section 7)

Germany:	<p>A 3 period sine wave followed by the letter D. This is an older German type approval for automotive glazing. (See image below).</p>  <p>Glazing marked Birkholz, Seitz, Roxite, Para Press or Bonoplex. Glazing marked PMMA (polymethylmethacrylate) or PC (polycarbonate).</p>
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If the glazing presented is not marked or is marked to a standard not listed above, it is the responsibility of the owner/presenter to provide documentary evidence that the glazing material is not likely, if fractured, to produce fragments capable of causing severe cuts.

7. Wastewater & Sewage Treatment Systems

- Wastewater & sewage treatment systems fitted to motor caravans will be checked for the presence of leaks.

8. Brake Testing & Un-laden Weight Dockets

- Brake performance testing on all motor caravans will be carried out on the basis of the weight presented as per the current Light Goods Vehicle (LGV) brake performance test. It will not be necessary to present an un-laden weight docket for the purpose of undergoing brake performance testing.

9. Gas Installations

- Gas installations fitted to motor caravans will not be checked as part of the test; however this will be reviewed in the future to perhaps require a declaration of conformance for the vehicle's gas installation.