

Ref: VS10/103

Circular Letter VS 4/05

23 December 2005

Roadworthiness Testing: Upgrading of Existing Test Centres

Dear Authorised Officer for Vehicle Testing,

1. The reform agenda for the schemes of vehicle testing includes measures to ensure that testing is delivered through a network of test centres operating to the highest test and customer service standards. Central to the achievement of this objective is the implementation by local authorities of revised guidelines relating to requirements for premises and test equipment for appointment as an Authorised Tester (test centre). The revised guidelines "*Guidelines for the Premises and Equipment required for the testing of Commercial Vehicles within the Vehicle Testing Network*", which were published by the Department last year, apply to all **new** applications for appointment as test centres since December 2004.
2. The reform programme also contains measures designed to raise standards in **existing** test centres. In that regard, **existing** test centres must meet the requirements of the 2004 Guidelines spread over a number of years in order to maintain their authorisations to test vehicles. The programme specifies the matters to be addressed and the date by which each item must be complied with - details of the programme for a HGV test centre and a LGV test centre are set out at Appendix 1 and Appendix 2 respectively. Where an authorised tester fails to comply with one or more of the specified requirements for a particular year by the due date (i.e. by 31 December), his/her authorisation to test vehicles is suspended for 3 months and if, at the end of that period, compliance still has not been achieved the licence to test vehicles automatically stands revoked. In the case of the upgrade requirements for 2005, where an undertaking to comply with the requirements by 31 March 2006 is received by the local authority a suspension should not be applied. However, if the authorised tester fails to comply with the undertaking, his/her licence to test vehicles shall

stand revoked from 1 April 2006. It is important that authorised testers are fully appraised of this position.

3. Upgrading existing test centres in line with the programme requires significant investment by authorised testers in terms of acquiring equipment and making modifications to premises. The need for such investment was recognised by the Department in the scale of test fees that came into effect in December 2004. The Department also recognises that some items in the upgrade programme are problematic for **certain existing HGV authorised testers** because of the inadequate size of their site with no potential to increase it. These items relate to the provision of a 20-metre pit and a drive-through facility. However, rather than settling for lower standards, both the Department and the Vehicle Testing Committee of S.I.M.I. (which represents most authorised testers), felt it was worthwhile to strive to achieve the objective of 20-metre pits and drive-through facilities insofar as it is practicable and reasonable to do so with certain concessions provided for those testers having serious and genuine difficulty in complying. In that regard, the Department and the Vehicle Testing Committee of SIMI have had discussions on the matter with a view to formulating a framework in which the integrity of the reform programme could be maintained while providing some elements of allowance for testers with genuine difficulties. Arising from these discussions, such a framework has recently been agreed.
4. I should point out that the agreed framework is premised on the general principle that existing test centres must meet the standards contained in the 2004 *Guidelines* on the basis of the Schedule at Appendix 1 and in that regard the requirement whereby a test centre must have a pit with a working length of at least 20 metres and drive-through facilities has to be implemented **where it is physically possible to do so**. The framework sets out the arrangements to apply in the case of test centres where it is **not physically possible to provide a pit of the required length and /or drive-through facilities**. A copy of the framework is at Appendix 3.
5. In relation to pits, the framework provides for two types of allowances, namely, situations where the potential maximum working length is (a) greater than 14 but less than 20 metres and (b) less than 14 metres but the tester proposes to acquire new premises.

The salient points concerning (a) are as follows:

- a local authority could allow testing to continue for a period of 20 years after 31 December 2007 or until the termination of the current lease on the premises, whichever is the later.

- any exemption to be given is subject to the local authority being satisfied that it is not physically possible to provide a pit to the required standard at the site.
- in granting an exemption, a local authority could limit the testing of vehicles to those not exceeding the maximum working length of the pit.

The salient points concerning (b) are as follows:

- a local authority could allow testing to continue for a period of 2 years after 31 December 2007.
 - any concession to be given is subject to the local authority being satisfied that it is not physically possible to provide a pit to the required standard or in excess of 14 metres at the site.
 - a local authority could limit the testing of vehicles to those not exceeding the maximum working length of the pit.
6. In relation to a drive-through, the framework provides that where a local authority is satisfied that it is not physically possible to provide at a test centre a drive-through facility, the authorised tester may be given an exemption from the requirement subject to every other requirement specified in the upgrade programme being met.
7. The agreement also provides that local authorities will facilitate, insofar as is reasonably practicable to do so, existing dual (HGV & LGV) testers who, during the phasing-in period, may wish to surrender their authorisation to test HGVs but retain their authorisation to test LGVs.

Queries regarding this circular letter should be made to the undersigned at tel. no. 01-6041260 or Ms. Anna O'Sullivan at tel. No. 01-6041312.

Yours sincerely,

James Ellis

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Vehicle Standards and Motor Insurance Division

Issued to each Authorised Officer for Vehicle Testing

Upgrade Programme for Existing HGV Test Centres

SCHEDULE 1

For completion by 31 December 2005

- Upgrade headlamp test area to Irish Standard
- Introduce audit of test equipment
- Hydraulic brake testers to be upgraded
- Signs to be fitted outside premises
- Overalls (tester specified) to be introduced
- Painted or tiled floors and walls to be specified colours

For completion by 31 December 2006

- Jacking system to be power operated (new jacks to be 15 tonnes)
- Waiting room with a view of test lane (CCTV will suffice if view of lane not possible within premises layout)
- Toilet facility
- Checkwear equipment

For completion by 31 December 2007

- Pits to meet new requirements
- Exhaust extraction system to be introduced
- Pilot system for computerised system for brake tester/smoke tester
- Meet CITA requirements

For completion by 31 December 2008

- Drive through facilities
- Door height requirements (4.8 metres acceptable if 5.3 metres is not possible to achieve)
- Parking area
- Smoke meters to new Irish Standard
- Computerised system for brake tester/smoke tester

Upgrade Programme for Existing LGV Test Centres

SCHEDULE 2

For completion by 31 December 2005

- Introduce audit of test equipment
- Provide tool for brake pedal pressure
- Hydraulic brake testers to be upgraded
- Signs to be fitted outside premises
- Overalls (tester specific) to be introduced
- Painted or tiled floors and walls to specific colours

For completion by 31 December 2006

- Jacking system to meet requirements
- Waiting room with a view of test lane (CCTV will suffice if view of lane not possible within premises layout)
- Toilet facility
- Checkwear equipment
- Sideslip plate

For completion by 31 December 2007

- Smoke meter to meet new standard
- Shock Absorber Tester
- Exhaust extraction equipment to be installed
- Computerised system for brake tester/smoke tester
- Meet CITA requirements

FRAMEWORK AGREEMENT

Upgrade Programme for Existing HGV Authorised Testers

General

1. The general principle is that, over time, existing test centres must meet the standards contained in the 2004 edition of the Department of Transport *Guidelines for Premises and Equipment for the Testing of Commercial Vehicles* on the basis of the Schedule at Appendix 1 which sets out the programme of tasks to be undertaken by Authorised Testers and the timeframe within which the various tasks contained in the programme must be completed. Specifically, the requirement whereby a test centre shall have a pit with a working length of at least 20 metres and drive-through facilities must be implemented where it is physically possible to do so. Notwithstanding the requirements specified in the Schedule at Appendix 1, it is recognised that, in certain cases, it may not be physically possible to meet the requirements in relation to having a pit with a working length of at least 20 metres and/or drive-through facilities. In such cases, the procedures at paragraph 2 or paragraph 3, as the case may be, should apply.

Pits

- 2(a). An Authorised Tester who is in a position to provide a pit with a working length in excess of 14 metres but not in excess of 20 metres **should apply immediately to the Authorised Officer for Vehicle Testing in their area** to have an assessment of their premises carried out. **Where the Authorised Officer is satisfied** that it is not physically possible to provide at the test centre a pit with a working length of at least 20 metres, the authorised tester may be given an exemption from the requirement in relation to the minimum working length of a pit provided that –
 - (i) by 31 December 2007 the working length of the pit shall be at the maximum possible length for the test centre, and
 - (ii) every other requirement specified in the Schedule at Appendix 1 is met by the date required

In granting an exemption, a local authority may restrict the authorised tester to testing vehicles (and combinations of vehicles) that do not exceed in length the maximum working length of the pit.

This exemption will operate for twenty years after the end of the phasing-in period or to the expiry of the current lease on the premises, whichever is the longer.

- 2(b) In the case of a test centre where it is not physically possible to extend the pit to a working length in excess of 14 metres but the authorised tester proposes to acquire new premises in the same local authority area, **the authorised tester may apply** to the Authorised Officer for Vehicle Testing in their area for a derogation to continue to test vehicles at their test centre for a maximum period of 2 years after the latest date specified in the Schedule at Appendix 1 for compliance with the requirement in relation to the minimum working pit length (i.e. 31 December 2009 at the latest).

In granting a derogation, a local authority may -

- (i) restrict the authorised tester to testing vehicles (and combinations of vehicles) that do not exceed in length the working length of the pit, and
- (ii) impose such other conditions as it considers appropriate.

Drive-Through

- 3 **An Authorised Tester** who is not a position to provide a drive-through facility **should apply immediately to the Authorised Officer for Vehicle Testing in their area** to have an assessment of their premises carried out. Where the Authorised Officer is satisfied that it is not physically possible to provide at the test centre a drive-through facility, the authorised tester may be given an exemption from the requirement in relation to a drive-through facility subject to every other requirement specified in the Schedule at Appendix 1 being met by the required date.

This exemption will operate for twenty years after the end of the phasing-in period or to the expiry of the current lease on the premises, whichever is the longer.

Door Height

4. 5.3 metres is the required door clearance height for new test centres, however, 4.8 metres clearance will be acceptable for existing premises where it is not possible to meet the new height requirements.

Miscellaneous

5. Where an Authorised Officer is satisfied that it is not physically possible for an existing dual (HGV & LGV) Authorised Tester to meet the full new HGV standards, as set out in the Schedule, the Authorised Tester may be permitted to retain LGV only testing from a specified date within the phasing-in period.

Where there are genuine grounds for an Authorised Tester to apply to the Authorised Officer for the such a change to LGV only testing, or in respect of seeking a derogation or exemption as provided for in paragraphs 2 and 3 above, the granting of the requested permission, derogation or exemption will not be unreasonably withheld.

Definition

6. The terms “not physically possible” or “not be physically possible” shall mean that because a test premises is bounded by buildings or land not owned by the Authorised Tester it is not possible for the authorised tester to extend their test centre to meet the requirements for a pit or a drive-through as set out in the 2004 edition of the Department of Transport *Guidelines for Premises and Equipment for the Testing of Commercial Vehicles*.