

September 2012



Light Trailers (O1 and O2)

Type Approval Leaflet

From 29th October 2012

NO APPROVAL – NO SALE

From the 29th of October 2012 manufacturers and retailers of light trailers (trailers with a Gross Vehicle Design Weight (GVDW) of 3,500kg or less) must ensure to have type approval certification for every new trailer where the trailer is a:

- Complete (single stage built) trailer placed on sale from the 29th of October 2012
- Completed (multistage built) trailer placed on sale from the 29th of October 2013
- Special purpose trailer placed on sale from the 29th of October 2014

Light trailers are different from other categories of vehicles as they are not registered or licensed. A light trailer placed on sale from the dates referred to above must have EC or Irish (Small Series Type Approval or Individual Approval) approval certification and light trailers have European categorisation:

- O1 – Trailer with a Gross Vehicle Design Weight (GVDW) of 750kg or less
- O2 - Trailer with a Gross Vehicle Design Weight (GVDW) over 750kg but not exceeding 3500kg

Background

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.

ECWVTA already applies to cars, vans and buses and from October 29th 2012 onwards, the system of type approval will extend to include light trailers and Ireland is obliged to ensure that new trailers entering the national fleet are 'type approved' and have approval certification to ensure that they meet with minimum safety and environmental standards. Type approval is mandated in all Member States of the European Union by EC Directive [2007/46/EC](#) and this Directive has been transposed into Irish law by [S.I. No. 157 of 2009](#) and [S.I. No. 158 of 2009](#). The Directive allows Member States to introduce national approval schemes and Ireland has introduced the National Small Series Type Approval (NSSTA) and the Individual Vehicle Approval (IVA) schemes for the approval of vehicles manufactured in small numbers or as individual vehicles. The technical and administrative requirements associated with NSSTA and IVA are less onerous than those of ECWVTA.

The National Standards Authority of Ireland (NSAI) is the Irish appointed approval authority and is responsible for issuing NSSTA and IVA for vehicles in Ireland. The NSAI has established a network of Approved 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.

While category O1 and O2 trailers do not need to be registered for use on Irish roads, from 29th October onwards they will need type approval in the form of ECWVTA, NSSTA (National Small Series Type Approval) or IVA (Individual Vehicle Approval) before they can be sold.

Upcoming Approval dates affecting light trailers

A light trailer placed on sale from the following dates must have EC or Irish (Small Series Type Approval or Individual Approval) approval:

- Complete (single stage built) trailer placed on sale from the 29th of October 2012
- Completed (multistage built) trailer placed on sale from the 29th of October 2013
- Special purpose trailer placed on sale from the 29th of October 2014

A complete trailer means a trailer which has been manufactured in a single stage (i.e. by a single manufacturer).

A completed trailer means a trailer which has been manufactured in more than one stage (i.e. by more than one manufacturer). An example of this would be a manufacturer who imports an

incomplete trailer chassis and assembles a body so that the completed trailer requires no further work and is in a finished condition.

A Special Purpose vehicle is defined in Directive 2007/46/EC as a vehicle “having specific technical features in order to perform a function which requires special arrangements and/or equipment”. These are trailers which, because of their technical features, they cannot meet the technical requirements of the Directives specified in Annex IV of Directive 2007/46/EC. In order for a manufacturer to declare that a trailer is special purpose, the manufacturer should first consult with the NSAI (or another European approval authority). An example of a light trailer which is considered a special purpose vehicle is a trailer caravan (which has a GVDW not exceeding 3500kg).

What proof of approval will the manufacturer or retailer need

A light trailer can only be sold after the relevant dates of approval if one of the following certificates of approval has been issued in respect of the trailer:

- **An EC Certificate of Conformity (EC CoC).** This certificate is issued in respect of a trailer that meets the European Communities Whole Vehicle Type Approval (ECWVTA) requirements. This certificate allows the trailer to enter into service in any Member State of the European Union.
- **An Irish National Small Series Type Approval Certificate of Conformity (NSSTA CoC).** This certificate is issued in respect of a trailer that meets Ireland’s National Small Series Type Approval requirements. Upon purchasing a trailer, the NSSTA CoC is issued by the manufacturer to the purchaser of a trailer and signifies that the trailer is of a type which has been approved by the NSAI. The number of trailers of which can be approved as part of a small series is limited to 500 per year.
- **An Irish Individual Vehicle Approval Certificate (IVA Certificate).** This certificate is issued in respect of a trailer that meets Ireland’s Individual Vehicle Approval requirements, a scheme suited for trailers imported or manufactured in very small numbers or as individual vehicles. Each trailer is examined individually and when the technical requirements are met, an IVA Certificate is issued by the NSAI to the owner or manufacturer.

If you import a new trailer and it has national approval certification from a Member State of the European Union other than Ireland, please contact the NSAI in order to have the certification and/or trailer examined in order to verify whether Ireland’s national approval requirements are met. Should the NSAI consider that Ireland’s approval requirements are met, then the NSAI will issue you with an Irish IVA certificate for the trailer.

Overview of standards applying to light trailers

In order for a manufacturer to have a type of light trailer approved, the following devices must be approved to European standards (by the supplier) and e-marked; lights, reflectors, tyres and couplings and these must be installed correctly (in line with approval requirements). The trailer must also be plated (giving details of the gross vehicle design weight). The main difference between the requirements for O1 and O2 trailers are that brakes are mandatory for O2 trailers and are optional for O1 trailers (and where fitted to an O1 trailer they must comply).

Contact Details

The NSAI - Irelands Approval Authority

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 contact Amanda by email amanda.oshea@nsai.ie or by phone 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](#). Please visit the RSA website at www.rsa.ie and navigate your way through to vehicle type approval. 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.

Appendix 1 FAQ's

How manufacturers can get approval for their vehicles?

An EC Certificate of Conformity (EC CoC) - *proof that the vehicle meets with European Communities Whole Vehicle Type Approval (ECWVTA)*

ECWVTA consists of a series of tests carried out on a prototype vehicle and on the production process used to manufacture the vehicle. If the vehicle and production process pass these safety and environmental tests, then the vehicle receives EC Whole Vehicle Type Approval. Each subsequent vehicle manufactured in the same way is issued with an EC Certificate of Conformity (EC CoC) which allows the vehicle to enter the fleet of any Member State of the EU.

In order to achieve ECWVTA, manufacturers need to apply for approval to an Approval Authority, of which there is one in each of the Member States of the European Union. Applying for ECWVTA can be costly and onerous and involves strict conformity of production requirements, but its main advantage is that it allows manufacturers to sell throughout the EU in unlimited quantities. In order to achieve ECWVTA, a light trailer (category O1 or O2) must meet with all of the relevant separate Directives and Regulations listed in Annex IV of [2007/46/EC](#).

Irish National Small Series Type Certificate of Conformity (NSSTA CoC)

There are a number of small to medium businesses who manufacture light trailers in small volumes for the Irish market. These manufacturers may find ECWVTA prohibitively expensive due to the limited quantities of vehicles they produce. Therefore, Ireland has introduced a national small series type approval (NSSTA) scheme for the approval of such vehicles. The NSSTA scheme is administratively less onerous than ECWVTA and where appropriate, alternative technical requirements apply. There are also reduced Conformity of Production requirements. Once NSSTA has been granted by the NSAI to the manufacturer, the manufacturer may issue a Certificate of Conformity (CoC) for each vehicle produced. The number of light trailers of one type that a manufacturer may produce in a year is limited to 500.

NSSTA is applied for in the Member State where vehicles are destined to be sold. The [National Standards Authority of Ireland \(NSAI\)](#) is the Irish appointed approval authority and is responsible for issuing NSSTA 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 trailer approvals.

In order to achieve NSSTA, a trailer must meet with the technical requirements set out in Part 3 of Schedule 3 of S.I. No. 158 of 2009. These requirements are derived from the EC requirements but with certain exemptions and variations.

Irish Individual Vehicle Approval Certificate (IVA Certificate)

Ireland has introduced the Individual Vehicle Approval (IVA) scheme for the approval of new vehicles manufactured (or imported) in very small numbers or as individual vehicles. The technical and administrative requirements associated with IVA are less onerous than those of NSSTA or ECWVTA. Once a vehicle passes an IVA inspection, an Individual Vehicle Approval Certificate is issued by the NSAI who administer the scheme in Ireland.

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. There is no limit to the number of vehicles that can be sold. However, as each vehicle is approved individually, the cost of approving several vehicles may be greater than the cost for NSSTA. The NSAI can help advise which option is more suitable for you.

In order to achieve IVA, a light trailer must meet with the technical requirements set out in Part 5 of Schedule 3 of S.I. No. 158 of 2009. These requirements are derived from the NSSTA requirements but with certain exemptions and variations.

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

Once approval has been granted by the approval authority (NSAI in Ireland), the manufacturer will get an *Approval Certificate*. It will either be an ECWVTA for vehicles approved from any approval authority in Europe, or an Irish NSSTA or an Irish IVA for vehicles approved in Ireland.

Manufacturers are required to pass on this Approval Certificate to those who retail trailers to the public. This certificate will take the form of a Certificate of Conformity if that type of vehicle has been checked to ECWVTA or Irish NSSTA, or the Irish Individual Vehicle Certificate if that vehicle has been individually approved. For Irish NSSTA, copies of the CoC must also be sent to NSAI.

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 are no *Conformity of Production* requirements for IVA.

I am a light trailer retailer. How can I get proof of approval?

Certificates confirming proof of approval will be issued to the retailer by the trailer manufacturer. 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 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 placed on sale 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*.

As a manufacturer or retailer of light trailers, do I need to keep records of approved trailers sold?

From the mandatory type approval dates, manufacturers and retailers of light trailers are required to have EC or Irish approval certification for the relevant new light trailers they hold in stock. When selling type approved trailers, manufacturers and retailers must keep type approval records for the trailers sold. (See Part 2 and Part 4 of SI No 158 of 2009).

What if I have a new trailer in stock that does not have proof of approval?

After the mandatory dates, light trailers must have approval before they can be sold. If you have a new trailer in stock which requires approval before it can be sold, you should contact the NSAI in order to investigate whether national approval (NSSTA or IVA) can be attained.

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.

I manufacture trailers for Ireland and one other EU Member State (the UK for example). Do I need different approvals for each market?

If your vehicle has ECWVTA you will not need separate approvals for each Member State (as these approvals are acceptable throughout the EU).

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 sell 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 sell the vehicle. Unless the relevant authorities determine that the national approval requirements for their country have been met, then sale may not be granted.

The RSA are actively pursuing mutual recognition arrangements between Ireland and 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).

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.