



Údarás Um Shábháilteacht Ar Bhóithre
Road Safety Authority

Frequently Asked Questions
on
European Community Whole Vehicle Type Approval
(ECWVTA)
and related
National Approval Schemes
Implementing Directive 2007/46/EC

**Some guidelines on Ireland's approach to the new revised
framework directive - 2007/46/EC**



What is ECWVTA?

ECWVTA stands for European Community Whole Vehicle Type Approval and is based on the principle that vehicles are manufactured to conform to an approved type. A vehicle which has ECWVTA is issued with an EC Certificate of Conformity which enables it to be registered in any EU Member State.

ECWVTA removes barriers to trade for manufacturers, while ensuring common safety and environmental requirements for operators and consumers. It has applied to cars since 1998. The Recast Framework Directive (2007/46/EC)¹ was negotiated over several years extends whole vehicle type approval to all commercial vehicles, including vans, minibuses, buses, coaches, heavy goods vehicles, caravans, small and large trailers and horseboxes. The Recast Framework Directive lists, in Annex IV of 2007/46/EC, the various Directives which set the minimum standards that must be met when manufacturing vehicles.

From when will ECWVTA apply?

ECWVTA will become obligatory for almost all vehicles between April 2009 and October 2014. Schedule 2 of [SI 157 of 2009](#) (European Communities Road Vehicles: Entry into Service Regulations 2009) sets out the obligatory dates for the various categories of vehicles [A table of the obligatory dates for ECWVTA and its related schemes can also be accessed here>>>](#)

Why is the Recast Framework Directive being implemented in Ireland?

Implementation of the Recast Framework Directive for relevant vehicles is mandatory in all EU member states. It is in the overall interest of the vehicle manufacturing industry in Ireland that ECWVTA is introduced, as it will enable

¹ Directive 2007/46/EC of the European Parliament and the Council of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for those vehicles



manufacturers and converters of vehicles to sell their vehicles across the EU, while providing assurance regarding manufacturing standards.

What vehicles fall within the scope of the revised Framework Directive?

Directive 2007/46/EC will extend ECWVTA to almost all road vehicles including buses, minibuses, trucks, vans, caravans, small and large trailers, horseboxes and special purpose vehicles. The Directive applies to the type approval of vehicles designed and constructed in one or more stages for use on the road, and of systems, components and separate technical units designed and constructed for such vehicles. It also applies to the individual approval of such vehicles. Vehicles of various propulsion types including petrol, diesel, hydrogen, electric, CNG and LPG are all included in the scope of ECWVTA.

What vehicles do not fall within the scope of the revised Framework Directive?

Are agricultural trailers included?

Vehicles which are not included within its scope are; two or three wheeled vehicles, quadricycles, (which are already subject to ECWVTA by Directive 2002/24/EC) and tracked vehicles. Also, agricultural vehicles and agricultural trailers do not fall within the scope of Directive 2007/46/EC, they are already subject to ECWVTA under Directive 2003/37/EC. However, the European Commission has recently launched a public consultation document setting out proposals on the future of type-approval legislation for agricultural vehicles, including agricultural trailers. The new regulation and its implementing legislation will replace the existing package of framework directive 2003/37/EC.

In addition the scheme is optional for vehicles limited to use in quarries, ports, or airports plus mobile machinery and vehicles operated by law enforcement authorities including military, civil defence, and fire services. Specialist racing vehicles and prototype vehicles are also allowed on the road without requiring approval under certain circumstances.



Are there provisions for Small Series Vehicle Approval and Individual Vehicle Approval? Who will test vehicles to ensure they meet the required standards?

Articles 23 and 24 of Directive 2007/46/EC allow for National Small Series Type Approval and Individual Approval and both these schemes have been introduced in Ireland. As the Approval Authority, the NSAI operate these schemes. The schemes will require the vehicles to comply with Technical Requirements devised for each. The Technical Requirements that vehicles of various categories are required to meet are set out in Schedule 3, of [SI 158 of 2009](#) the European Communities (Road Vehicles: Type Approval) Regulations 2009.

The NSAI (National Standards Authority of Ireland) is our appointed Approval Authority and is responsible for issuing all national approvals (IVA or NSSTA) for vehicles in Ireland. To deliver the national approval schemes, the NSAI has established a network of Appointed Test Centres (ATC) to undertake testing for these vehicle approvals and the ATCs will issue test reports for some or all of the technical requirements.

For more information on the approval schemes and the routes to certification, please visit the NSAI website www.nsai.ie and navigate your way through to the type approval information. Alternatively follow this link: [Motor vehicle approval schemes>>>](#)

I have heard that ECWVTA is expensive to achieve. I am involved in the bus converting business and only manufacture vehicles for sale in the Irish market, are there alternative options other than ECWVTA open to me?

Yes. ECWVTA is most beneficial and suitable for manufacturers of large quantities of the same type of vehicle who regularly trade throughout Europe. Those who manufacture smaller quantities of vehicles, individual vehicles or who do not trade throughout Europe could find ECWVTA prohibitively expensive. Such manufacturers may also find it difficult to obtain an example of the type of vehicle needed to pass the requirements within the Separate Directives. This can be time consuming and disproportionately expensive for small quantities of vehicles and impossible for individual vehicles where the Separate Directive includes destructive testing.



Directive 2007/46/EC recognised this by allowing Member States to introduce two national schemes:

- National Small Series Type Approval (NSSTA), and
- Individual Vehicle Approval (IVA).

Vehicles subject to these schemes are allowed derogations from some of the administrative provisions and technical requirements contained in the Separate Directives and are allowed to demonstrate compliance by more pragmatic means. They may also be exempted from some of the destructive testing. Ireland has introduced both NSSTA and IVA.

What impact does ECWVTA and its related National Approval Schemes have for importers of vehicles?

In the case of new vehicles imported into Ireland having an EC Certificate of Conformity issued by the Manufacturer, this certificate must simply be presented to the Revenue Commissioners at vehicle registration.

In the case of new vehicles imported into Ireland that do not have an EC Certificate of Conformity, the NSAI will be contacted by the importer to arrange to have an individual vehicle tested in order to obtain an Individual Vehicle Approval (IVA). There are two levels of individual vehicle approval for vehicles imported into Ireland. These are for:

- Commercial imports. Vehicles imported commercially for the Irish market are required to fulfil the requirements of Schedule 3, Part 5 of [SI 158 of 2009](#) (European Communities Road Vehicles: Type Approval Regulations 2009).
- A personally-imported vehicle. Personally imported vehicles and other vehicles defined in schedule 7 of [SI 158 of 2009](#) (European Communities (Road Vehicles: Type Approval Regulations 2009) are exempt from certain requirements which commercial imports are required to fulfill. These exemptions are set out in Schedule 3 Part 5 of the Regulations.

In both scenarios, the applicant and the NSAI will discuss eligibility for approval and possible correlation of any components with non-EU approvals such as the



possibility of accepting safety belts manufactured to UNECE standards which may reduce the amount of physical testing required. Following testing at an Approved Test Centre, the NSAI will check that testing on all IVA Technical Requirements has been completed. The NSAI will then issue an Individual Vehicle Approval Certificate with its unique reference number and log the approval. The IVA certificate will then be presented to the Revenue Commissioners at vehicle registration.

What impact does ECWVTA and its related National Approval Schemes have for importers of second hand vehicles from outside the EU?

Initially, ECWVTA and its related national approval schemes will only apply to new vehicles. A new passenger car (M1) is defined as not having been registered before, being less than 3 months old or having travelled less than 3,000km. New vehicles of categories M2, M3, N1, N2 or N3 are defined as not having been registered before or having been registered outside of the EU for less than 3 months.

It is the intention of the RSA to seek to extend the scope of vehicles which fall under the type approval schemes to include all vehicles that have not been registered in the EU and are under 10 years old in due course.

What implications does the introduction of the new revised framework directive have for vehicle registration?

In order to register a new vehicle in Ireland after the Framework Directive becomes effective for the class of vehicle [see enforcement dates in Schedule 2 of [SI 157 of 2009](#) (European Communities Road Vehicles: Entry into Service Regulations 2009) [a table of the obligatory dates for ECWVTA and its related schemes can also be accessed here>>>](#)], the vehicle must have one of the following;

- EC Certificate of Conformity issued by the Manufacturer which must confirm the vehicle is suitable for left hand rule of the road and that the speedometer is marked in km/hr

or

- A National Small Series Type Approval [NSSTA] Certificate of Conformity issued by the Manufacturer [approval initially issued by NSAI]



or

- An [Irish] Individual Vehicle Approval [IVA] certificate issued by the NSAI.
- or
- An IVA or NSSTA issued in another Member State, which has been checked for equivalency with Irish requirements by the NSAI

I manufacture O₄ type trailers. I am interested in achieving ECWTA for the trailers. If I achieve ECWTA, will that mean I can freely export the trailers to other European Member States?

Yes. One of the goals of ECWTA is the harmonisation of the European market. As part of this, if a vehicle has been granted the relevant EC whole vehicle type-approval, no other member state can refuse to register or permit the sale and entry into service of the new vehicles (on grounds of construction) if they are accompanied by a valid EC Certificate of Conformity (CoC). An EC certificate of conformity is, in effect, a statement by the manufacturer that the vehicle conforms to the relevant separate directives of EC type-approval.

If I achieve NSSTA for a series of vehicles or IVA for an individual vehicle, can I export the vehicle(s) to other European Member States?

Each Member State can compile its individual lists of requirements enabling the requirements of the Separate Directives to be tailored to suit its particular circumstances. However, to ensure that overall safety and environmental requirements are not compromised, these approvals are limited to sale and entry into service only within that Member State. Recognition of NSSTA or IVA given in one Member State by another Member State is encouraged in Articles 23 and 24 of the Recast Framework Directive but that Member State is permitted to refuse recognition if it considers the requirements are not equivalent. For this reason Ireland intends pursuing mutual recognition of NSSTA and IVA requirements with the UK. There are, however, numerical limits set for NSSTA (see Schedule 4 of [SI 158 of 2009](#) (European Communities Road Vehicles: Type Approval Regulations 2009 for NSSTA quantity limits)).



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Is UK type approval recognised here? and vice versa?

Consideration needs to be given to the issue of mutual recognition with the UK. This is of particular importance given the close proximity of the Member States and the existence of a strong import/ export market for vehicles between Ireland and the UK. For example, there are a number of Irish manufacturers who export trailers, cars, vans and buses to the UK and the absence of a formal mutual recognition system would have a detrimental effect on their business. Similarly, in relation to imports, many businesses rely on the UK. The Road Safety Authority and the NSAI have been working closely with the UK towards facilitating mutual recognition of vehicles approved to our respective national schemes in order to decrease barriers to cross border trade.

With regard to NSSTA and IVA technical requirements, the existing Irish and UK regulations are very similar. There are limited differences that exist – for example, the UK require speedometers marked in imperial graduations and in Ireland these must be marked in metric (however may be marked imperial and metric together). Should you source a vehicle in the UK which has UK SSTA or UK IVA, then an application should be made to the NSAI who will then examine the documentation and if acceptable, will advise the Revenue Commissioners to accept same. Alternatively, if you are a manufacturer you could discuss with NSAI the possibility of having an [Irish] NSSTA granted for your vehicle type. As pointed out, limited differences exist between the requirements in both jurisdictions and we are looking to converge some of these differences. However the speedometer requirements and the UK's relaxation for side facing seats in M1 vehicles (for example limousines) are two examples of areas which we do not intend to converge towards the UK requirements.

How do the Revenue Commissioners and NCTS examine type approval certification?

When a new make, model, version or variant is put on sale in the State, the distributor declares the details of that vehicle to Revenue using their form VRT40.



The type approval number and technical details of that vehicle type are included on the form and the original Certificate of Conformity is included with the VRT 40 for examination and verification. The model is identified by a unique Statscode.

An “electronic birth cert” for each vehicle (identified by VIN), of that model (identified by Statscode), that is intended to be put on sale in the State is sent to Revenue. The birth cert is a record containing the technical data for the vehicle, number of doors, windows, wheels, and all the data off the CoC – data that is needed for registration and taxation purposes.

Since the 1st September 2010, private individuals can only register their vehicles at one of the designated NCT centres. This NCTS will examine all unregistered vehicles in order to ensure the correct VRT is applied and that they comply with the legal requirements set down by the Revenue Commissioners. For new vehicles presented for registration, approval certificates for the type of vehicle being registered are a mandatory requirement. For further details on this registration process and to arrange a booking, please visit www.revenue.ie and www.ncts.ie.

Our company is involved in the bus bodybuilding industry. We would like to attain NSSTA for the addition of a body type on an N₃ vehicle. How do we go about achieving this?

A manufacturer must contact NSAI to make an application for NSSTA for N₃ category vehicles that have been modified and had bodies added. The base vehicle on which this body will be mounted should already have an Incomplete Approval certificate which will list the tests the base vehicle has already passed. The Manufacturer will arrange and undertake testing at an NSAI Appointed Test Centre including checks to ensure that the base vehicle approvals are still valid and will submit to NSAI the report of the test results. NSAI will check that all testing required by NSSTA to complete approval has been carried out. It is the responsibility of the manufacturer to issue NSSTA certificates for each vehicle produced as part of the series and to record the running lists of the number of vehicles produced to ensure that the small series limit in the Directive of 250 units for N₂ or N₃ vehicles is not exceeded. Checks can be carried out by the NSAI that these limits are not exceeded



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Our company is involved in the bus converting business. We would like to attain NSSTA for a series of vehicles. How do we go about achieving this?

The manufacturer contacts NSAI to make an application for NSSTA for a bus conversion. The base vehicle on which this body will be mounted should already have an Incomplete Approval certificate which will list the tests the base vehicle has already passed. Otherwise, the vehicles may have a complete or completed vehicle approval as a category N vehicle (category N). The Manufacturer will arrange testing by an NSAI Appointed Test Centre (after contacting NSAI first), including checks to ensure that the base vehicle approvals are still valid and will submit to NSAI the report of the test results. NSAI will check that all testing required by NSSTA to completed approval has been carried out. The NSAI will log and issue NSSTA. It is the responsibility of the manufacturer to issue NSSTA certificates for each vehicle produced as part of the series and to record the running lists of the number of vehicles produced to ensure that the small series limit in the Directive of 250 units for M₂ or M₃ vehicles is not exceeded. Checks can be carried out by the NSAI that these limits are not exceeded

If the same design body is fitted to different truck makes (e.g DAF, Volvo, Scania) is there a different Type Approval required for each body?

Yes. The manufacturer is obliged to contact NSAI to make an application for NSSTA or IVA as appropriate for each type of vehicle that has been manufactured/ modified.

Our business is trailer manufacturing. We would like to gain ECWVTA for an O₄ type trailer that we manufacture so that we can sell the trailer type in other European Member States. How do we go about achieving this?

In this scenario, the trailer manufacturer applies to NSAI for ECWVTA. The manufacturer will use one or more of the Technical Services approved by NSAI and NSAI will check that all testing required by the Framework Directive has been completed and that the type of vehicle has passed. The NSAI will issue whole vehicle type approval and will notify the approval authorities in other Member States.



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The NSAI will maintain a record of the approval for 10 years. (If it is more convenient the manufacturer can request approval from the Approval Authority in any other Member State of the European Union.). ECWVTA of a vehicle will facilitate its entry into service in every Member State of the EU.

Post registration modifications have been made to a vehicle. What implications does this have for type approval?

National policy on type approval must not be undermined by those who would wish to circumvent one or more of the approval requirements by making alterations to a vehicle following registration. Consideration has been given to strengthening the current arrangements within the Revenue Commissioners and the local authority motor tax offices for notification of alterations to vehicle registration or licensing details. It is therefore intended that a system to control post registration modifications will be implemented. A system of Notifiable Alterations, similar to the system that currently exists in the UK, is being considered to check the safety of any significant changes to the construction of road vehicles. The details of how this system will operate have not yet been defined, however it may involve the converter of the vehicle notifying the NSAI of alterations to the vehicle and having the vehicles processed in the same way as for pre-registration modifications. Any Notifiable Alteration scheme will be introduced through separate legislation and stakeholders will be notified on the development of such a scheme.

To fit a hitch do such modifications need to be processed?

As part of the type approval process, a hitch fitted to a vehicle will be required to conform to the requirements of Directive 94/20/EC relating to the mechanical coupling devices of motor vehicles and their trailers and their attachment to those vehicles.



When a tilted body is fitted to a truck, will the type approval authority test the strength of weld?

If a vehicle is examined as part of IVA, the vehicle will be inspected for compliance with the separate directives. This inspection will include a visual inspection. While testing of the strength of a weld is not part of an IVA inspection, any apparent structural fault discovered during the visual inspection could lead to approval not being granted.

If a truck (e.g. 26ft) was approved in the UK, modified smaller (e.g. to 24ft) and then sold to a customer in Ireland, who is responsible for the body cut?

In this case, the vehicle in question falls into the category of a notifiable alteration in the UK where notification of changes to vehicle body and weight changes are required to be made to VOSA (Vehicle and Operator Services Agency) in the UK. Details of the notifiable alterations should have been made by the seller to VOSA and the details processed prior to the vehicle sale. So, in this case, the seller is responsible for the body cut.

How much will it cost to get NSSTA or IVA?

It is impossible to accurately predict the cost of approvals under each scheme, as costs will vary depending on the number and complexity of the tests required on a particular vehicle and the time taken to undertake the required tests. The NSAI fees will also vary considerably, depending upon the complexity of their initial consultation with the manufacturer to decide what testing and inspections will be required, the review of the test reports resulting from the test process(es) and inspection process(es) and the associated administrative tasks resulting in the generation of a NSSTA or IVA. It is likely that additional costs may also be incurred in preparing the vehicle(s) to undergo the required testing. You need to contact NSAI at www.nsai.ie in this regard.



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How long will tests take for Type Approval?

It is difficult at this stage to estimate a timeframe for the type approval process for a particular vehicle, as the timeframes will differ greatly depending on the testing required. You need to contact NSAI at www.nsai.ie in this regard.

How will the requirements to obtain approval be enforced?

The effective check on the approval for new vehicles which require registration in order to enter into service (categories M and N) is at the point of registration. After their [mandatory dates of approval](#), it will not be possible to register a category M or N vehicle in Ireland without an EC Certificate of Conformity, Certificate of Conformity following NSSTA or an IVA Certificate. Requirements in the Statutory Instruments, that will be introduced to implement ECWVTA, NSSTA and IVA, will allow for the continuation of the current method of enforcement by the Gardaí. New trailers of categories O3 and O4 first licensed in the State after their [mandatory approval dates](#) will require an EC Certificate of Conformity, Certificate of Conformity following NSSTA or an IVA Certificate. Licensing of trailers is handled by the [motor tax offices in the Local Authorities](#). O1 and O2 trailers are not registered in the State. However, in order to enter into service after their mandatory dates of approval, new trailers of these categories will require an EC CoC, NSSTA CoC or an IVA Certificate. Enforcement of road traffic legislation is a matter for the Gardaí.