

Special Purpose M1 (Passenger Car)

Type Approval Leaflet

From April 29th 2012

NO APPROVAL – NO SALE

The 29th of April 2012 is an important upcoming date for the registration of new Special Purpose M1 vehicles (passenger cars) in Ireland. From 29th of April 2012 onwards, all NEW special purpose M1's must have proof of approval before the Revenue Commissioners will register the vehicle for use on Irish roads. Special purpose vehiclesⁱ are vehicles which have been adapted in order to perform a particular function requiring special arrangements or equipment. Examples of special purpose M1's include the following vehicle categories:

- Motor caravanⁱⁱ
- Ambulanceⁱⁱⁱ
- Hearse^{iv}
- Wheelchair accessible vehicle^v
- disabled person's vehicle^{vi}

Each of the above are defined in Appendix 2 of this document

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.

Since 1998 all new passenger cars (M1's other than special purpose) have been required to have ECWVTA in order to be registered. Now ECWVTA is being extended to vehicles of other categories and Ireland is obliged to ensure that new vehicles 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 schemes which permit derogations from some of the technical and administrative provisions of ECWVTA for vehicles built in small series.

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

From 29th of April 2012 onwards, all new special purpose M1's must have one of the following proofs of approval before the Revenue Commissioners will register the vehicle for use on Irish roads:

- **EC Certificate of Conformity (EC CoC).**
- **Irish National Small Series Type Certificate of Conformity (NSSTA CoC)**
- **Irish Individual Vehicle Approval Certificate (IVA Certificate)**

How manufacturers/ converters 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 stringent 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 be registered in any Member State of the EU.

In order to attain 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. The names and addresses of all of these Approval Authorities can be found at the following link[>>>](#). 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 order to achieve ECWVTA, a special purpose vehicle must meet with all of the separate regulations listed in Annex XI of [2007/46/EC](#). There are no limits to the amount of ECWVTA vehicles which can be registered per year and an example of a manufacturer who may use this route would be a large scale manufacturer of ambulances who wishes to sell throughout Europe.

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

There are a number of small to medium businesses who manufacture special purpose vehicles in small volumes for the Irish market. The special purpose vehicles are invariably manufactured by adapting or converting conventional passenger or goods vehicles. 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, however the number of special purpose M1's of one type that a manufacture may produce in a year is limited to 75.

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 special purpose vehicle approvals.

In almost all cases, special purpose M1's are adapted from conventional vehicles which already have approval. In these cases, only the modifications carried out to the original vehicle need to be examined by the NSAI and approvals for the unaltered aspects of the vehicle will remain valid. An example of a manufacturer who may wish to apply for NSSTA would be one who converts station wagons into hearses.

In order to achieve NSSTA, a special purpose vehicle must meet with the technical requirements set out in Part 4 of Schedule 3 of S.I. No. 158 of 2009. These requirements are derived from the EC requirements but with certain exemptions and variations. Although converters are only responsible for the alterations they carry out, it is necessary that they pass on the approval certificates for the original vehicle which they have worked upon as part of an application for approval to the NSAI.

Irish Individual Vehicle Approval Certificate (IVA Certificate)

Ireland has introduced the Individual Vehicle Approval (IVA) scheme for the approval of new vehicles imported or manufactured in very small numbers or as individual vehicles. Under the approval scheme, each vehicle is checked in order to ensure that it meets modern safety and environmental standards. 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 which allows the vehicle to be registered in Ireland. As with NSSTA, the NSAI administer the IVA scheme in Ireland and manufactures should contact them for more details.

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. 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.

In order to achieve IVA, a special purpose vehicle 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. Although converters are only responsible for the alterations they carry out, it is necessary that they pass on the approval certificates for the original vehicle which they have worked upon as part of an application for approval to the NSAI.

An example of a manufacturer who may wish to use the IVA route to approval would be a motor caravan manufacturer who specialises in one-off conversions for the Irish market.

Disabled Persons Vehicles

In relation to vehicles adapted for the disabled, the NSAI have developed a scheme whereby workshops will be licensed to carry out certain vehicle adaptations. Under the scheme, workshops will be required to have trained fitters for each kind of adaptation they carry out (e.g. hand controls, swivel seats etc.) and also the necessary tools and equipment to enable this work to be carried out. Once licensed, the workshop can then submit applications to NSAI for IVAs for the vehicles it adapts. Proof of approval certification will be a prerequisite for those applying for tax relief for new vehicles purchased for use by people with disabilities from April 29th 2012 onwards.

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.

The Revenue Commissioners - Ireland's registration authority

The Revenue Commissioners are Ireland's registration authority for motor vehicles. From 29th of April 2012 onwards, the Revenue Commissioners will require that all NEW special purpose M1's have proof of approval before they will register the vehicle for use on Irish roads. Certain special purpose vehicles may be eligible for a VRT rebate through the Disabled Drivers and Disabled Passengers Scheme, and further information on the tax relief scheme can be found on the [Revenue Commissioners' website](#).

Type approval requirements are limited to new vehicles presented for first registration. Used vehicles registered in another State and subsequently modified for use by a Disabled Driver/Passenger, require a completed "Declaration of Conversion by Vehicle Owner" and "Declaration by Suitably Qualified Individual "to be presented along with the current registration document of the vehicle at the time the vehicle is presented for registration.

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

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

Once approval has been granted by the approval authority in Ireland (the NSAI), 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, 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 special purpose vehicle (M1) after the April the 29th 2012, the Revenue Commissioners will require this certificate confirming proof of approval.

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.

I am a 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 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 originally approved. For example, if you add wheelchair accessibility then evidence will be required by the approval authority that the anchorages for the restraint systems which you have fitted are sufficiently strong in order to resist the prescribed forces. Further to this, evidence will be required that webbings and hardware intended to secure the wheelchair (tiedown mechanisms) meet with prescribed strength requirements. The 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 conversion process and converters will generally require access to the base vehicle manufacturer's approval information and ensure that modifications carried out are in line with the base vehicle manufacturer's guidelines where applicable.

I only want to sell my hearse 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).

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.

Appendix 2 Definitions

i **Special purpose vehicle** is defined in [EU/678/2011](#) (which amends [2007/46/EC](#)) as the following: *“Special purpose vehicle (SPV)” means a vehicle of category M, N or O having specific technical features in order to perform a function which requires special arrangements and/or equipment.*

For incomplete vehicles that are intended to fall into the SPV subcategory, the letter “S” shall be added as suffix to the letter and numeral identifying the vehicle category.

The various types of special purpose vehicles are defined and listed in Section 5.

ii **Motor caravan** has EU bodytype code SA and is defined in [EU/678/2011](#) (which amends [2007/46/EC](#)) as the following: *A vehicle of category M with living accommodation space which contains the following equipment as a minimum: (a) seats and table; (b) sleeping accommodation which may be converted from the seats; (c) cooking facilities; (d) storage facilities. This equipment shall be rigidly fixed to the living compartment. However, the table may be designed to be easily removable.*

iii **Ambulance** has EU bodytype code SC and is defined in [EU/678/2011](#) (which amends [2007/46/EC](#)) as the following: *a vehicle of category M intended for the transport of sick or injured persons and having special equipment for such purpose. The patient compartment shall comply with the technical requirements of Standard EN 1789:2007 on “Medical vehicles and their equipment – Road ambulances” with the exception of Section 6.5 “List of equipment”.*

iv **Hearse** has EU bodytype code SD and is defined in [EU/678/2011](#) (which amends [2007/46/EC](#)) as the following: *a vehicle of category M intended for the transport of deceased persons and having special equipment for such purpose.*

v **Wheelchair accessible vehicle** has EU bodytype code SH and is defined in [EU/678/2011](#) (which amends [2007/46/EC](#)) as the following: *a vehicle of category M 1 constructed or converted specifically so that they accommodate one or more persons seated in their wheelchairs when travelling on the road.*

vi **Disabled person’s vehicle** is defined in the European Communities (Road Vehicles: Type-Approval) Regulations 2009 (S.I. No. 158 of 2009) as the following: *a vehicle that is adapted or specially constructed so as to enable a person who has a disability to travel in the vehicle, whether as the driver or a passenger, in safety and reasonable comfort.*