

Vehicle type approval: establishing a GB road vehicle approval scheme

Personal details

Q1. Your (used for contact purposes only):

name? David Davies

email? David.davies@pacts.org.uk

Q2. Are you responding:

on behalf of an organisation?

Organisation details

Your organisation's name is?

Parliamentary Advisory Council for Transport Safety (PACTS)

Q3. Your organisation is best described as:

another type of organisation?
Transport safety charity

Organisation or interest group members

Q4. For your organisation or interest group how:

many members do you have? 100+

did you obtain the views of your members? Consultation and working party meeting.

Statutory plate requirements and alternative options

Q5. What, if any, comments do you have about:

our proposed options for alternative statutory plates?

We have no strong views about this particular issue. Either option would work and it seems reasonable offer at least these 2 choices so that manufacturers can select the option which provides the simplest, cheapest, most reliable and safest approach for any particular model. We have a slight preference for Option 1, as Option 2 provides no additional information to Option 1; duplicates the VIN and manufacturer's name as they are recorded on the Regulation (EU) 19/2011 statutory plate and adds an additional plate with all the associated costs, complexity issues and potential tampering implications.

to allow a transition period for manufacturer's statutory plates?

In order to minimise costs to UK consumers and tax payers and avoid tampering and security risks, we propose an indefinite transition period, during which any vehicle already having EU Whole Vehicle Type Approval is automatically approved for sale in the UK and no further UK plate would be required. This pragmatic approach would significantly reduce the costs to manufacturers (and hence UK consumers), reduce the administrative and financial burden on UK Government, Civil Service and Tax Payers, as well as ensuring that the newest, safest and cleanest vehicles are made available quickly on the UK market. The additional burden of GB and/or NI Type Approval for EU Approved vehicles will add little or no benefit to UK consumers or government whilst at the same time reducing the product offerings made on UK markets. Similar arguments apply to the need for NI TA for vehicles which already have EU TA. AS these have to meet the EU requirements, an EU approved vehicle is clearly acceptable to NI. There is no need for any unnecessary bureaucratic complications for such vehicles. For vehicles not approved for sale in the EU, there may still be a need for some form of GB and/or NI type approval, but for EU approved vehicles, it will add nothing of benefit to the UK.

Continued acceptance of test reports

Q6. What, if any, comments do you have regarding the proposed transition dates for the acceptance of technical reports issued by a technical service designated by an EU authority?

Allowing for test reports from technical services designated by EU approval authorities to be permitted until at least 31 December 2025 is an intelligent measure. There is the option to seek to extend this period as part of a mutual equivalence arrangement where, in return, GB approved technical services could be approved designated bodies for the EU. This would provide GB technical authorities with the potential to expand their offering and generate greater income for the UK economy. We support the extension of test reports from EU approved technical services for an indefinite time period. This will reduce the costs to UK consumers, government and tax payers, as well as ensuring that that the newest, safest and cleanest vehicles are made available quickly on the UK market.

What analysis has been carried out to model the approval and administrative work required for VCA to assess and approve technical services?

Will the VCA and the GB designated technical services have the capacity to approve new vehicles within the proposed timeframe?

What will be the requirements for staffing levels and skills to carry out these largely repetitive and redundant tasks?

Provisional GB approvals for multi-stage vehicles

Q7. What, if any, comments do you have on the proposal to allow base vehicles used in multi-stage approvals to have a provisional GB approval rather than requiring a full GB approval?

This is for a considerable number of vehicles (e.g. motorhomes) and retaining the current arrangement is appropriate. However, the export of these vehicles to EU markets will now require additional approvals increasing the burden on manufacturers. Is it possible in these circumstances for the vehicles to be UKNI approved and, if so, would these vehicles then be accepted by the EU?

Will EU member states permit GB approved vehicles to use their roads if they are not EU type-approved? How will the ADAS features fitted to the base vehicle be assured/ validated following a modification to the vehicle? Will the original base vehicle manufacturer need to certify that they perform as intended?

Approvals for components and separate technical units

Q8. What, if any, comments do you have on the proposed approach to:

provisional type-approval for components and STUs?

This seems logical although, as with the rest of the approval process proposals, it is simply keeping existing requirements and transferring the approval authority to the GB for little benefit to UK consumers, tax payers or government.

full type-approval for components and STUs? -

Provisional and full GB scheme dates for road trailers

Q9. What, if any, comments do you have on the proposed approach to:

provisional type-approval for trailers?

The consultation states “The technical requirements for the GB type approval scheme will be those set out in the retained EU regulations. We are proposing amendments to these regulations to ensure they function correctly in the GB scheme but the technical requirements themselves will be unchanged.” Therefore, at this stage there is no material change but there will be additional paperwork and approval requirements over time for trailer manufacturers who sell or wish to sell their products in the EU.

full type-approval for trailers? -

Final comments

Q10. Any other comments?

Paragraph 2 in the Executive Summary states that, “Any proposed changes will be UK-based rather than EU law and tailored to the interests of the UK. The government will consider whether to mirror international regulations, including recent changes made by the EU such as the recent General Safety Regulation, on a case-by-case basis.”

PACTS believes very strongly that the UK should adopt the EU GSR and PSR requirements in full, in line with EU introduction timings. This is the best measure the UK government can currently implement to further improve the safety performance of vehicles in the UK.

Further details of the arguments for this are contained in the recent PACTS Briefing Document, “Vaccine for Vehicles: Preventing deaths and injuries on UK roads – PACTS briefing January 2022”.

The UK took a leading role in developing the specification of and justification for the technical requirements of the GSR and PSR. Any attempt to consider these requirements on a measure by measure basis will drastically reduce the benefit (casualty savings) whilst not significantly reducing the costs (because sensors and cameras support a number of systems). It will unequivocally put GB behind the leading nations for vehicle safety and those developing connecting and automated vehicles.

In addition, some of the technical requirements in the retained EU legislation outlined in Table 1 on Page 14 will be changed and replaced with UNECE Regulations by the GSR (eg Advanced Emergency Braking Systems, Lane Departure Warning Systems, Pedestrian Protection and Hydrogen). Deviation from the on-going EU requirements in these areas will add cost and bureaucracy for no benefit to the UK.

Paragraph 1.4 states, “The Northern Ireland Protocol determines how the type-approval of vehicles and their components apply in Northern Ireland. This paper sets out the provisions that need to be put in place to manage the interaction between the type-approval of products for the market in Great Britain and type-approval of products for placing on the market in Northern Ireland. This includes ensuring unfettered access continues, so that goods moving from Northern Ireland to the rest of the UK can do so without further certification or testing”.

Can you please confirm that this means that an EU approved vehicle would be free to be sold in NI and would not need additional “UKNI” testing and approvals?

Will arrangements be put in place to allow UKNI approvals be accepted in the EU?