

# Responses to the Consultation on the Review of the Inspection Procedures of the Driver and Vehicle Licensing Agency (DVLA) and the Driver and Vehicle Licensing Agency Northern Ireland (DVLNI)

## Contents

Responses to the Consultation on the Review of the Inspection Procedures of the Driver and Vehicle Licensing Agency (DVLA) and the Driver and Vehicle Licensing Agency Northern Ireland (DVLNI) .....	1
Contents .....	1
Responses to DVLA's Consultation on the Review of the Inspection Procedures .....	1
'Q' Registration Marks .....	1
Permanently Imported Vehicles .....	2
Rebuilt Vehicles .....	2
VOSA's Vehicle Identity Check (VIC) .....	3
Radically Altered Vehicles .....	3
Kit Built Vehicles .....	4
Kit Conversions .....	5
DVLNI Kit Conversions .....	6
Reconstructed Classics .....	6
Cherished Transfers .....	7
V765 Scheme (which reunites historic vehicles with their original registration marks) .....	8
1st Registration where a Dating Certificate is submitted as evidence of the date of manufacture .....	8
Vehicles that are not currently subject to inspection but which may be considered for inspection in the future. ....	9
Any other inspection requirements suggested by respondents .....	9
List of Acronyms Annex A .....	9

## Responses to DVLA's Consultation on the Review of the Inspection Procedures

1. The Consultation on the Review of Inspection Procedures of the Driver and Vehicle Licensing Agency (DVLA) and Driver and Vehicle Licensing Northern Ireland (DVLNI) was issued in April 2004 and DVLA received 431 responses.
2. The consultation paper outlined the current procedures for every registration that requires an inspection and provided an opportunity for those who need to have their vehicles inspected to influence future policy.
3. The consultation did not seek views or specify proposals, instead it sought to canvass opinions on how the processes and policies should be changed to reflect current manufacturing and legislative requirements.
4. A summary of the responses received by DVLA appears on the following pages, together with recommendations which will receive further consideration. If, as a result of this review, proposals emerge that affect businesses, charities and voluntary bodies, a further consultation and Regulatory Impact Assessment (RIA) may be required.

## 'Q' Registration Marks

### Background

5. Where there is doubt about the origin, age, or identity of a vehicle, a 'Q' registration mark is issued. 'Q' registration marks were introduced following wide consultation with the Police, Motor Trade, Salvage Industry, and other interested parties. Although seen by many vehicle enthusiasts as a seal of disapproval, since its inception in 1983 in Great Britain and 1990 in Northern Ireland, the 'Q' registration mark has proven a useful consumer protection aid. The display of a 'Q' registration mark is a visible sign to a prospective purchaser of a vehicle's uncertain history.

## Summary of findings

6. Many stakeholders suggested that there should be a check of the vehicle, post allocation of a 'Q' mark, to verify that the vehicle presented to the DVLA/ DVLNI Local Office (LO) is the correct one. This should be achieved by the LO security marking the vehicle and by checking that the VIN allocated by the Local Office is present on the vehicle. It was also suggested that the security marking be checked at MoT testing by the Vehicle and Operator Services Agency (VOSA) or in NI the Driver and Vehicle Testing Agency (DVTA).

7. Some stakeholders suggested that the vehicle record be annotated to show why the 'Q' mark was allocated.

8. Many stakeholders suggested that the 'Q' mark route should not be used to facilitate 1st registration where there is evidence that the vehicle has previously been registered in another country.

9. The stakeholders associated with the enthusiast clubs and the historic vehicles suggested that the process be simplified.

## Recommendations

- LO security-mark the vehicle on initial inspection.
- VOSA check the VIN and security marking at SVA and MoT testing.
- To consider under what circumstances a 'Q' registration mark should be allocated.
- V5C should record the reason for the 'Q' mark being allocated e.g. rebuilt, stolen/recovered.
- Where the police identify stolen/recovered vehicles, the original or appropriate age-related mark be allocated and the V5C annotated.

## Permanently Imported Vehicles

### Background

10. A vehicle imported into the UK for use on the public road must be licensed and registered immediately after its arrival and before it is kept or used on a public road. The vehicle must be in the UK and available for inspection before an application to register and license is made. Permanently imported vehicles are currently inspected by DVLA/DVLNI to establish its category as well as its identity.

### Summary of findings

11. Stakeholders agreed that verification checks on imported vehicles by government bodies could be improved. Ideas to be considered included LON inspecting all vehicles subject to ESVA/SVA/MSVA and VOSA introducing an identity check as part of the type approval testing with specialist training to be given to staff.

12. Many stakeholders considered that non-EU vehicles should provide evidence of their original registration at first registration in the UK. Concerns were expressed about the use of dating certificates and it was considered that evidence of previous registration abroad should be provided for all used vehicles. There was concern about these vehicles being genuine and a desire to see that systems be established to monitor processes. These included the inspection of the vehicle to ensure it corresponded to the documentation and that the documentary evidence was genuine.

13. Stakeholders from car clubs and historic vehicle clubs were interested in making the process more flexible. They felt that less bureaucracy and a more streamlined service should be developed.

14. Some stakeholders considered that the existing processes could be improved by establishing better links both between government departments and established import businesses. It was widely agreed that a faster streamlined service, with better trained staff and less bureaucracy would be beneficial.

### Recommendations

- VOSA include an identity check of the vehicle as part of the type approval testing.
- DVLA/DVLNI to require evidence of previous registration abroad for all vehicles at first registration in UK.
- That the requirements for dating evidence be tightened.
- A closer liaison between HMCE and DVLA LO be established.
- An expansion of SVA to include mileage information and colour check.
- An efficiency review to consider the introduction of dedicated units within LON.

## Rebuilt Vehicles

### Background

15. A rebuilt vehicle may keep its identity provided it retains enough of the original components, including the unmodified or new chassis/monocoque body-shell. It must also contain at least two major components from the

original vehicle. The major components are currently considered to be the suspension (front and back), axles (both), transmission, steering assembly, engine. If a second-hand or modified chassis/monocoque body-shell is used, a 'Q' registration mark will be issued and the vehicle will be subject to type approval.

### **Summary of findings**

16. There was no consensus for changing the current procedures. It was suggested that specialist training be provided for LO staff and that there be a consistent approach to inspections across the network.

17. It was considered that since the introduction of the procedures 20 years ago manufacturing procedures had changed radically and that the current list of major components needs to be reassessed. There was some concern about the lack of part marking.

18. There was agreement that the V5C should be annotated to show that the vehicle had been rebuilt, but that only major damage should be noted on the vehicle record. The industry considered that assigning alternative VINs to reshelled vehicles allowed for easier ringing of vehicles. There was some support for retention of the original mark.

19. Car enthusiasts, whilst acknowledging safety was important, wanted simplified procedures and clearer guidelines. There was support for annotating the V5C to reflect the fact that the vehicle had been rebuilt.

20. The Police suggested that all rebuilt vehicles be allocated 'Q' registration marks, which would remove the need for the point system and make accident damaged vehicles less attractive.

### **Recommendations**

- To consider when a vehicle ceases to be the 'original' vehicle.
- To re-consider what constitutes a 'major component'.
- That the registration certificate be annotated to show the vehicle is 'rebuilt'.
- That DVLA staff receive specialist training. DVLA Note: This action has already been instigated

## **VOSA's Vehicle Identity Check (VIC)**

### **Background**

21. The VIC scheme is a compulsory identity check, carried out by VOSA, on any car or light van "written off" as category A, B or C salvage by an insurer following accident damage, and which is subsequently repaired for road use. The check also applies to scrapped cars with third party insurance.

### **Summary of findings**

22. Government bodies had concerns about the double handling of applications and felt that consideration should be given to quicker turnaround time for VIC appointments and that the scheme should include all vehicles and categories of damage.

23. The Police offered to assist in staff training. They welcomed a closer liaison with VOSA in order to increase expertise in identifying trends in criminal activity.

24. The Rental and Leasing Industry had concerns about the continued use of the paper Notification of Accident Damage, V23. Classic vehicle enthusiasts considered the scheme harsh on classic and historic vehicles and asked for consideration to be given to older vehicles which have been re-shelled.

25. Respondents suggested better information about the scheme; inspections to be conducted by mechanical engineers or experts; all vehicles to either be MoT tested or have an enhanced MoT test before they are allowed onto the road; more information printed on the registration certificate, e.g. the category of accident damage and date of accident; the process simplified; the fee reduced; the application supported by evidence, in the form of a certificate, of the parts used in the repair and that every vehicle subject to a VIC, be security marked.

26. Others considered that: seriously damaged vehicles should not be allowed back onto the road; a national register of "written off" vehicles should be established; manufacturers introduce a system of security marking components; components should be security tagged; the scheme to include re-shelled vehicles and the scheme to be extended to all vehicles.

The VIC Scheme is administered by VOSA and any changes to its processes will be considered by VOSA separately.

## **Radically Altered Vehicles**

### **Background**

27. It is a legal requirement to notify DVLA of changes to a vehicle's details. A 'radically altered' vehicle is a vehicle that has been radically altered from its original specification. If there are sufficient components from a donor vehicle, including the unmodified chassis/ body shell/ frame, the vehicle will retain its original registration mark. If

a second-hand or modified chassis/monocoque body shell/frame is used, a 'Q' registration mark will be issued and the vehicle will be subject to type approval.

## Summary of findings

28. There were varied responses from government departments. It was suggested; that where the original chassis was retained but the appearance changed to a different specification from the original, the vehicle should be subject to SVA, that since the introduction of the INF 26 guidelines, manufacturing processes have changed and the point system is no longer as relevant as it was, that applicants should be required to present an engineer/garage report, that a check at MoT testing would identify vehicles which had been modified but DVLA had not been notified.

29. The Police considered the emphasis should be on vehicle crime and that the current procedures were open to abuse. They agreed that there should be a mechanism for identifying changes e.g. at MoT; that where a vehicle was modified from its original specification, it should be regarded as newly built and SVA etc be required.

30. The trade associations suggested that if the original VIN is retained, the vehicle registration mark should be retained; all radically altered vehicles be inspected and receipts produced to confirm the legitimate purchase of the components; that safety was the main issue.

31. The car enthusiasts suggested that there should be a friendlier, more flexible, consistent, less bureaucratic approach to assessment. Specialised training, more use of enthusiast clubs when assessing vehicles; that a new category of 'customised vehicle' be introduced with the registration certificate annotated accordingly. They considered that a cosmetic change to a vehicle does not alter its identity.

32. There was some agreement that safety was a priority and that all vehicles should be subject to a MoT or enhanced MoT test.

## Recommendations

- To consider when a vehicle ceases to be the original vehicle.
- To consider whether vehicles which have been radically altered from their original specification, require type approval. This may involve changes to legislation.
- That the registration certificate be annotated to indicate that the vehicle has been 'customised'.
- That staff received specialised training. DVLA Note: This action has already been instigated
- To consider checking the make/model details at the MoT test.

## Kit Built Vehicles

### Background

33. A Kit Built Vehicle is one that is made from all new parts supplied by a kit manufacturer. After an earlier review, a concession was introduced to allow the use of one used component, reconditioned to an 'as new' standard. It was intended that this component would be the engine, in order to assist with the authenticity of a replica vehicle.

34. Subject to the provision of satisfactory receipts and a Certificate of Newness from the manufacturer, the vehicle will be allocated a current registration mark. If receipts are not available or LO is not satisfied that the kit or the 'as new' component is new, a 'Q' registration mark will be issued.

### Summary of findings

35. From a safety aspect, government respondents would not like to see any weakening of the current procedures, especially the requirement for ESVA/SVA/MSVA.

36. It was suggested that the concession allowing one reconditioned part to be used in the build of a new kit car be more strictly applied, with evidence to prove that the modern equivalent is unavailable. The Police suggested that kit manufacturers mark the vehicle components, and that components be authenticated as new.

37. There was general consensus that vehicles should be inspected by qualified staff and that the current inspections were adequate. There was some suggestion that kit built vehicles be assessed by VOSA for registration purposes as part of the SVA test.

38. The kit industry want replica vehicles correctly described on the registration certificate and not to have the name of the original manufacturer of the copied vehicle mentioned.

39. It was suggested that an engineer's report or an enhanced MoT be presented at first registration. The motor industry considered that safety must be paramount. The Police and VOSA considered that VOSA should inspect.

### Recommendations

- That the current concession which allows the use of one reconditioned component be tightened.
- In instances where an 'as new' component is used the registration certificate be annotated accordingly.

## **Kit Conversions**

40. There are two types of kit converted vehicles and they are currently assessed differently.

### **Type 1.**

#### **Background**

41. A kit converted vehicle is a registered vehicle whose general appearance has changed from the original specification when a kit of new parts is added to the existing vehicle, and the original, unmodified chassis/bodyshell is retained. The vehicle will either retain its original mark or, if the donor vehicle cannot be identified, will be allocated a 'Q' registration mark.

#### **Summary of findings**

42. All interested parties were concerned about safety and did not want procedures weakened. There was support for a 'one stop shop' and the Police considered that the kit conversion process should be given a complete overhaul. It was generally agreed that all kit conversions should be subject to the SVA test and there was some support for an enhanced MoT test. It was suggested that DVLA should process the documentation but VOSA should perform the inspection.

43. There were varied suggestions: some respondents considered a vehicle should only retain its original identity where the stamped-in VIN was retained; any vehicle differing in appearance, or re-shelled from the original, should be regarded as being new (or of indeterminate origin) and thus be subject to SVA/ESVA/MSVA as appropriate; the donor parts should date a vehicle, (there is no requirement for manufacturers to mark components); an age-related registration mark should only be issued where the date of manufacture of the engine can be established; that a range of marks be reserved specifically for kit cars/conversions; that LO staff receive technical training and that inspections are carried out at sites with facilities suitable for under-vehicle inspection.

44. Representation from the Kit Industry suggested that any vehicle modified so that it could fail an SVA test, should be subjected to that test. Arrangements should be made to allow the vehicle to be driven to and from the inspection without being registered (subject to adequate insurance).

45. The enthusiasts/kit builders wanted to simplify the procedures with consistency and flexibility across the LO network, reduction of bureaucracy and quicker response time by LO.

#### **Recommendations**

- To consider allocating an alternative registration mark when a vehicle has been changed from its original specification.
- That all kit converted vehicles built using a new or modified chassis/bodyshell be allocated non-transferable VRMs and that cherished transfers be prohibited in the same way as 'Q' registered vehicles.

### **Type 2.**

#### **Background**

46. A kit-converted vehicle is a registered vehicle whose general appearance has changed from the original specification when a new monocoque bodyshell/chassis is used together with 2 major components from a donor vehicle. DVLA assigns a new registration mark based on the age of the donor vehicle or, where there are insufficient parts from a donor vehicle or the original registration number is not known, the vehicle will be allocated a 'Q' registration mark. The vehicle is regarded as being first registered in its new identity and, depending on the vehicle type, ESVA/SVA/MSVA is required as part of the registration process.

#### **Summary of findings**

47. All interested parties were concerned about safety and did not want procedures weakened. There was support for a 'one stop shop' and the Police considered that the kit conversion process should be given a complete overhaul. It was generally agreed that all kit conversions should be subject to the SVA test and that VOSA must decide the level of test for the vehicle. Some considered that the resemblance to the original vehicle should not be an issue, providing the original chassis/body-shell/frame was used. This was balanced by the view that if the vehicle specification changed, there would be safety implications.

48. The kit conversion category is an area of the inspection process that gave most concern. It is considered that vehicles built from parts, all of which cannot be identified or are not new, should be treated in the same way as rebuilt or radically altered vehicles. There were varied views on whether the allocation of the registration mark should be based on the chassis/body-shell/frame number, although this would be difficult to administer, as the manufacturers do not mark all major parts. LO relies on the customers self declaration when making their assessment and since the introduction of the VIC and Certificate of Destruction (CoD) schemes, there has been

evidence of abuse.

49. The introduction of age-related registration marks for this category has highlighted several problems, including the testing status of the vehicles, the cherished transfer position and the taxation position. The kit industry considers that all kit cars and kit conversions should have a current date of first registration and a current date of manufacture, with a concession for those amateur builders who have built replica kits and want an appropriate vehicle registration mark based on the donor components. The kit industry asked for legal provision to allow vehicles to be driven to and from VOSA testing stations. A number of vehicle enthusiasts/clubs/public suggested; that the vehicle should be assessed on the youngest component, that the registration certificate annotated to reflect the new description, that a new category of “special construction” be introduced to describe these vehicles, that a qualified person assesses these vehicles, that an engineer’s report would be sufficient at registration, and that older vehicles would not pass the ESVA/SVA/MSVA test. DVLA Note: both European and domestic legislation requires evidence of type approval to be presented at first registration

### **Recommendations**

- To consider the allocation of age-related registration marks for kit converted vehicles.
- To consider that the allocation of registration marks to all kit converted vehicles be on a non-transferable basis and that cherished transfers be prohibited in the same way as ‘Q’ registered vehicles.

## **DVLNI Kit Conversions**

### **Background**

50. The registration system in NI is not age-related. Vehicles are assessed to a weighting system and will either retain their original registration marks, be allocated a current mark or, where there are insufficient parts from a donor vehicle or the original registration number is not known, the vehicle will be allocated a ‘Q’ registration mark.

### **Summary of findings**

51. All interested parties were concerned about safety and did not want procedures weakened.

52. DVLNI consider that the inspection of kit converted vehicles should be carried out by technically qualified staff such as those in DVTA (NI) or an outside agency such as the AA. There was some concern that stolen parts could be used in the build.

53. DVLNI considered: that in the interest of customer service the inspection should be conducted at the customer’s own premises and that a fee should be charged for the service; that a ‘drop in’ system, with inspections taking place in a particular town, on a particular day and on a first come basis, with registration facilities available; that all vehicles should be inspected and evidence of SVA and MoT provided; that the vehicle should keep its original mark with the V5C annotated to say what changes had been made. If there is no evidence of the original vehicle, a ‘Q’ mark should be issued. If two registration marks are involved, the oldest mark should be used.

### **Recommendations**

- To consider that the allocation of registration marks to all kit converted vehicles be on a non-transferable basis and that cherished transfers be prohibited in the same way as ‘Q’ registered vehicles.
- Give further consideration to DVLNI’s suggestions for improving the service to customers.

## **Reconstructed Classics**

### **Background**

54. The Reconstructed Classics category was introduced by DVLA following the 1996 review of the rebuilt, radically altered and kit vehicle procedures (INF 26) and was intended to support the restoration of classic vehicles.

55. There are instances when a vehicle will have been built as a faithful reproduction of a classic vehicle, using parts sourced from more than one vehicle. In this instance, if there is sufficient documentary evidence to confirm that the completed vehicle comprises all genuine period components, of the same specification all over 25 years old, the vehicle will be allocated a non-transferable age-related registration mark. The age-related registration mark will be based on the date of manufacture of the youngest vehicle component.

### **Summary of findings**

56. VOSA had concerns that vehicles might be circumventing the SVA scheme by being presented as rebuilt classic vehicles. The enthusiast clubs considered that to authenticate a vehicle, the origins of the chassis/monocoque should be established and that only vehicle enthusiast clubs which have been vetted and can demonstrate that they hold historic information relating to the marque of the vehicle concerned should be used for verification.

57. There were differing views within government respondents on whether this category of vehicle met its objective and should be retained. Representation from within DVLA suggested several options: that the category be removed; that vehicles be aligned to the 'Historic Vehicle' taxation class i.e. pre-1973, rather than a rolling programme; that where the original mark of the donor vehicle is known, the vehicle should retain that mark and the V5C should be annotated to show the changes, and where there is dispute, a 'Q' registration mark should be issued.

58. It was considered that ways of distinguishing restored classic or vintage vehicles from rebuilt vehicles using a donor vehicle of unknown origin need to be introduced. DVLA felt all these vehicles should be inspected to a SVA and MoT standard.

59. Respondents suggested that customers should produce a MoT certificate and evidence from an independent garage/mechanic that the vehicle is roadworthy and that all registration certificates issued should indicate that the vehicle has been modified. The Police want reconstructed classics to use genuine components and be issued with a non-transferable age related registration mark.

60. Some enthusiasts felt that, as time passed, it would be increasingly difficult to obtain genuine period replacement components for these vehicles and that the guidelines should be relaxed to allow for new replica components. There was equal concern from others that a vehicle could not be considered as a 'classic' if all components were not original period parts.

## **Recommendations**

- To consider if the registration of these vehicles should be aligned to the 'Historic Vehicle' taxation class i.e. pre-1973 rather than a rolling programme.
- To consider whether all reconstructed classic vehicles and certain kit conversions should be allocated 'Q' registration marks as an indication of the vehicle's indeterminate origins.
- To consider if the category of Reconstructed Classics should be retained.

## **Cherished Transfers**

### **Background**

61. Registration marks are assigned by the Secretary of State as part of the basic licensing and registration process required by law. A registration mark is a unique means of identifying a vehicle, primarily for taxation and law enforcement purposes. It is not an item of property in its own right and it will normally remain with the vehicle until it is broken up, destroyed or sent permanently abroad. However, with the widespread interest in personalised registration marks, special facilities are provided for those motorists who wish to transfer their vehicle's registration mark.

### **Summary of findings**

62. DVLA stakeholders and others suggested either the re-introduction of 100% inspection of donor vehicles by LO or 100% inspection for all vehicles more than 36 months old. It was recognised that, if this were adopted, the current licensing criteria for the cherished transfer and retention schemes would become obsolete and SORN'd vehicles could participate in both schemes. Any change to the licensing criteria would require an amendment to the Retention of Registration Marks Regulations 1993.

63. It was suggested that LO staff should be properly trained and to reduce the potential for fraud, two inspection officers should be present for each inspection. Stakeholders suggested involving the Police in inspections and introducing a PIN number as evidence of ownership.

64. Enthusiast clubs wanted to stop registration marks being transferred from classic or historic vehicles. Cherished Transfer dealers were in favour of inspecting only the donor vehicle. There were mixed views about whether the current system met its objectives and fears that it did not deter fraud. Generally, it was considered that it would be correct to include stolen and seriously damaged vehicles in the scheme. Trade Associations suggested that a two-tier scheme be introduced for low and high-risk vehicles and with a stringent inspection regime. Others suggested that an inspection should not be required if a MoT is in force.

## **Recommendations**

- Extend the current licensing criterion for the donor vehicle from 'licensed within the last 6 months prior to application' to 'licensed within the last 12 months prior to application'. The application to be accompanied by a SORN declaration where required.
- To consider the percentage of inspections aligned to the transfer process.

## **V765 Scheme (which reunites historic vehicles with their original registration marks)**

### **Background**

65. In 1982, the decision was made to close the register to the conversion of all the manual records in existence before the creation of DVLA's computer records. In 1990, following representation from the historic vehicle associations, DVLA introduced the V765 registration scheme. This scheme was intended to reunite historic vehicles with their original registration marks. At the time it was envisaged that the number of 'old' vehicles being presented for registration would decline. However, there is evidence that a substantial number of 'old' vehicles are still being registered each year. DVLNI operates a similar scheme.

### **Summary of findings**

66. Stakeholders were generally content with the scheme and keen to see it continue. There were suggestions that only vehicles not radically altered from their original specification be accepted and there was some support for a one-off exercise to register all old vehicles and announce a closing date for the scheme.

67. Relaxation of the documentary evidence required was suggested, in particular to allow the use of photographs or letters, although there were concerns about the possibility of forged documents. It was also suggested that the acceptance of old 'tax discs' be discontinued as these were readily available and, as they do not contain chassis numbers, could be misleading.

68. Stakeholders associated with enthusiast clubs suggested a variety of measures as a protection against abuse of the scheme. These included more consumer awareness, with spot checks by DVLA/DVLNI and the Police; standardising checks to ensure clubs have the correct status, knowledge and experience to support V765 applications. A common suggestion was to accept only applications from a club relevant to the marque.

69. A further concern of stakeholders was the increase in the number of old style logbooks (VE60) and chassis plates being offered for sale by e-mail companies.

### **Recommendations**

- To consider that applications to reunite vehicles with their original registration marks should only be accepted from the authorised enthusiast clubs for the particular marque.
- To continue to monitor the sale of old style logbooks, chassis plates and tax discs and take appropriate action where necessary.

## **1st Registration where a Dating Certificate is submitted as evidence of the date of manufacture**

### **Background**

70. Following concerns expressed by the Police, DVLA intends carrying out a review of the dating certificate procedures in the UK. This will be independent of the inspection review. However, 71 respondents commented on the use of dating certificates and their comments will be taken into account during the dating certificate review.

### **Summary of findings**

71. The Police considered that DVLA is too customer orientated and that the emphasis needed to change to that of law enforcement.

72. The Police had concerns about the use of dating certificates for the registration of imported vehicles and had evidence that the system is open to abuse. DVLA had similar concerns. Both agreed that there was no reason for any vehicle, which claims to have been registered prior to its importation into the UK, to be without some form of documentation, be it a registration document or an export certificate. Where no documentation is available, it was suggested that registration should be refused until it could be provided.

73. Enthusiast clubs gave strong support for either a physical inspection of the vehicle or the issuing of dating certificates to be limited to recognised enthusiast clubs, on condition that they are in possession of the factory records.

Recommendations will be made following a review into the dating certificate procedures

## **Vehicles that are not currently subject to inspection but which may be considered for inspection in the future.**

74. The consultation paper asked recipients to consider whether vehicles not currently subject to inspection should be inspected to ensure that they comply with current legislative requirements i.e. type approval requirements, after, for example a change in tax class

### **Recommendations**

To consider;

- that vehicles which change category within, for instance, 3 years of first registration, be inspected,
- extend the scope of the MoT to identify whether the changes made to a vehicle are reflected in the registration certificate,
- the introduction of a vehicle category check for all vehicles presented where an exemption from type approval exists (with the exception of vehicles manufactured for disabled persons),
- to inspect vehicles which have been previously type approved within the EU prior to the issue of a Minister's Approval Certificate (MAC),
- stricter enforcement for not notifying changes of vehicle details to DVLA,
- the annual inspection of caravans,
- all vehicles, which have been subject to an inspection, be security marked,
- All recovery and breakdown vehicles to be inspected prior to licensing and registration.

## **Any other inspection requirements suggested by respondents**

75. The consultation paper asked recipients to consider any other inspection requirement.

### **Recommendations**

To consider;

- More stringent inspections required (such as ESVA) and extended to vehicles manufactured or adapted for disabled persons, stretch limousines, taxis, minibuses – with VOSA to inspect,
- Type Approval for changes of use,
- vehicles likely to be used for the commercial carrying of passengers,
- vehicles, such as limousines, should be inspected to ensure that they are correctly licensed,
- van to car conversion – documentary evidence should be required to verify the conversion.

## **List of Acronyms Annex A**

CoD Certificate of Destruction

DVLA Driver and Vehicle Licensing Agency

A

DVLA Driver Vehicle Licensing Northern Ireland

NI

DVLA Driver and Vehicle Testing Agency (NI)

A

ESVA Enhanced Single Vehicle Approval

A

EU European Union

HMCE Her Majesty's Customs and Excise

HM

CE

INF 26 An information leaflet issued as a guide to the registration of rebuilt, radically altered vehicles and kit vehicles

LO Local Offices of DVLA and DVLANI

MAC Minister's Approval Certificate

C

MoT Ministry of Transport

MSVA Motorcycle Single Vehicle Approval

VA

RIA Regulatory Impact Assessment

SORN Statutory Off Road Notification

N

SVASingle Vehicle Approval

V76  
5 The scheme to reunite historic vehicles with their original registration marks

VIC Vehicle Identity Check

VIN Vehicle Identification Number

V5C Registration Certificate

VOS  
A Vehicle and Operator Services Agency

VR  
M Vehicle Registration Number