



Vehicle & Operator Services Agency

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To: Consultees

24 October 2006

VOSA Fees for HGV and PSV Testing and Inspections; Operator Licensing; Bus Registration; Tachograph Centre Approval; and Single Vehicle Approval

Changes to test content for Class IV minibuses and Class V and VA non-PSV buses

Executive Summary

VOSA is proposing to increase fees by an average of 5.5% for lorry and bus testing and inspection, operator licensing, bus registration, tachograph centre approval and Single Vehicle Approval.

We are also proposing to introduce two new statutory fees for SVA and ADR services.

We are also proposing minor changes to the MOT test content for class IV minibuses; and class V and VA, non-PSV buses.

This letter is our formal consultation seeking your views about these proposals.

How to Respond

Any comments should be made by Friday 12 January 2007 in one of the following ways:

a) In writing or by fax to:

Mr Chris Manning
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b) By e-mail at vosa.fees07@vosa.gov.uk

This document is available on VOSA's website at www.vosa.gov.uk. Alternatively, requests for further copies should be made to Chris Manning on e-mail vosa.fees07@vosa.gov.uk

Our Proposals

We set out details of the proposed fee increases at Annex A. The package includes fees set in legislation for:

- tests and re-tests of HGVs and PSVs;
- specialised inspections of HGVs and PSVs;
- operator licences for HGV and PSV operators;
- bus registration and permits;
- examinations for Single Vehicle Approval.

Overall, we propose to increase fee income in line with operating cost increases affecting VOSA's costs for these services over the 20 month period from August 2006 (the end of the period covered by the previous increase implemented on 30 September 2005) until April 2008 (the planned implementation date of our next fee review). As is our normal practice, we propose to round fees generally to the nearest pound. As a result some fees increase by more than the average figure whereas some increase by less or do not increase at all.

We also propose to introduce two new statutory fees.

- The first covers a service in the Single Vehicle Approval scheme to apply for a Minister's Approval Certificate for new vehicles which are EC type approved but for which a certificate of conformity cannot be issued. Although VOSA has been providing the service for some time, the fee was omitted from regulations and we wish to correct that omission.
- The second is to cover a new service to be introduced to certify new, type approved, vehicles for the international carriage of dangerous goods (ADR). This is being introduced as a result of a change to the international treaty governing such vehicles and would only come into effect when UK legislation is updated to refer to the updated treaty.

Finally, we also propose two minor changes to the MOT test content as follows:

- The first implements our European obligation to enforce the extension of requirements to have speed limiters to all passenger vehicles with 9 or more passenger seats.
- The second adds checks on registration plates and VIN to class V and VA to bring them into line with other 'MOT' classes.

Background

Between 2003 and 2005, VOSA increased most fees at above-RPI rates in order to realign fees to reflect the work involved and to fund the start of various programs to provide improved customer services by refurbishing test stations and providing increasing levels of e-enabled services. This was fully explained in consultations prior to the September 2005 increases. Many of these improvements involved long term commitments to fund ongoing services, invest in major capital works with resulting increases in depreciation and to start to repay loans for capital work already carried out. These costs of these long term commitments have to be covered by fee income.

VOSA is also carrying out a programme of value for money improvements aimed at delivering services more effectively in the longer term in line with Government targets for headcount reduction. The savings from this are also being invested in various projects to improve customer services, facilities and improved effectiveness in targeting non-compliant vehicle users.

VOSA has also had to provide for increases in pay and pension costs in line with Government policies.

The 'new' fee for SVA merely proposes to put a fee which we have been charging for some time into the regulations in the same way as other SVA fees.

The new fee in ADR is aimed at enabling British hauliers to take advantage of a new type approval system when the accord and domestic legislation brings this into effect during 2007.

The additional MOT test items implement our European obligations for class IV minibuses and bring the test content of classes V and VA into line with other 'MOT' test classes.

Value for Money

In the consultation for the 2005 fee increases and in our 2006/7 Business Plan, VOSA stated that value for money savings would be used to deliver improved services and allow an accelerated programme of investment in IT, e-services and facilities. We intend to continue this process in 2007/8 to meet the aspirations of making compliance easier for customers and minimising our impact on the compliant; and ensuring that our facilities are suitable to meet present and future needs of our customers. Our investment programme for 2007/8 has not yet been finalised, but examples of such investment in our 2006/7 business plan include work on:

- Operator Compliance Risk Scoring, Automatic Number Plate Recognition and Weigh in Motion Sensors to target the non-compliant;
- gearing up for the introduction of digital tachographs;
- improved processes to contribute to the modernisation of operator licensing;
- development of on-line test booking and bus service registration;
- major modernisation of 5 test stations and updating of headlamp aim and brake test equipment in many others

The cost of a test still remains good value for money. The fees for HGV and PSV tests compare to the MOT test for private cars, light goods and large passenger vehicles. For example the cost of a test for a Class 7 goods vehicle is £47.20 at the time of writing but DfT are consulting on a proposal to increase this to £53.80 this autumn – the proposed fee for a 2 axle HGV is £49. For small buses, Class 5 MOT fee (13 – 16 passengers) current fee is £47.95 proposed to rise to £54.65 – the proposed PSV fee (9 – 22 passengers) is £56. Even with the proposed increases, test fees are still a very small part of the overall costs of operating a HGV or PSV.

Regulatory Impact Assessment

- Partial RIAs are attached for the proposed fee increase (annex B) with separate partial RIAs for the two new fees (Annexes C and D respectively).

Annexes

Annex A	Fee List - showing present fee, proposed new fee and percentage change
Annex B	Partial RIA for general fees increase
Annex C	Partial RIA for additional SVA fee for new type approved vehicles
Annex D	Partial RIA for ADR certificates for type approved vehicles
Annex E	Partial RIA for addition of registration plates and VIN for classes V and VA
Annex F	Partial RIA for addition of speed limiter checks to minibuses in class IV
Annex G	Consultation criteria
Annex H	List of consultees
Annex I	Legislation to be changed to implement the proposals

Stephen Tetlow

ANNUAL TESTING

	axles	Current	Proposed	% fee increase
Motor Vehicles				
Annual test	2	46	49	6.5
	3	66	70	6.1
	4	86	91	5.8
Retest	2	30	32	6.7
	3	44	46	4.5
	4	57	60	5.3
Partial paid retest		10	11	10.0
DP Annual (supplemental)		11	12	9.1
DP Retest (supplemental)		7	7	0.0
Out of hours supplement (annual test)		32	34	6.3
Out of hours supplement (retests)		16	17	6.3
Trailers				
Annual test	1	23	24	4.3
	2	34	36	5.9
	3	44	46	4.5
Retest	1	15	16	6.7
	2	22	23	4.5
	3	29	31	6.9
Partial paid retest		5	5	0
DP Annual (supplement)		6	6	0.0
DP Retest (supplement)		3	3	0.0
Out of hours Annual (supplement)		20	21	5.0
Out of hours Retest (supplement)		11	12	9.1

LICENSING FEES

	Current	Proposed	% fee increase
Application for a licence	215	227	5.6
Grant of 5-year licence	336	354	5.4
Application for a variation of existing licence	215	227	5.6
Issue of an interim licence	57	60	5.3
Continuation in force of an existing licence for further 5 years	336	354	5.4
Additional fee for vehicles specified on licence:			
If paid 5 years in advance (per vehicle per 3 months)	9	9	0
If paid annually in advance (per vehicle per 3 months)	11	12	9.1
On interim licence (per vehicle)	11.30	12	6.2

NOTIFIABLE ALTERATIONS

	Current	Proposed	% fee increase
Motor Vehicles and trailers	22	23	4.5
DP Supplement for motor vehicles	7	7	0
DP Supplement for trailers	3	3	0
Out of hours supplement	11	12	9.1
Appeal Fee	25	26	4.0
Duplicate plate, cert or disc	11	12	9.1

TIR (Transport Internationaux Routiers) convention simplifying customs requirements by permitting sealed loads to pass through international customs controls unhindered

	Current	Proposed	% fee increase
Initial Inspection	87	92	5.7
Re-inspection	58	61	5.2
Type Approval	534	563	5.4
Type Variation	87	92	5.7
Certificate of Conformity	12	13	8.3
Duplicate certificate	12	13	8.3

ADR (Excluding Statutory Test Fee) International arrangement for the carriage of dangerous goods

	Current	Proposed	% fee increase
Initial Inspection	82	87	6.1
Re-inspection	42	44	4.8
New type approved motor vehicle certificate	N/A	25	N/A
Duplicate certificate	12	13	8.3

ANNUAL TESTING

	seats	Current	Proposed	% fee increase
Annual test	9 to 22	53	56	5.7
	23+	76	80	5.3
Retest (14 day)	9 to 22	35	37	5.7
	23+	50	53	6.0
Minor items retest	9 +	10	11	10.0
DP Annual		11	12	9.1
DP Retest		7	7	0.0
Out of hours supplement	9-22 (test)	32	34	6.3
	23+ (test)	44	46	4.5
	9-22 (retest)	16	17	6.3
	23+ (retest)	21	22	4.8

PSV LICENSING FEES

	Current	Proposed	% fee increase
Application for standard (national or international) licence	202	213	5.4
Application for restricted licence	134	141	5.2
Grant of a standard or restricted licence:			
If paid 5 years in advance	134	141	5.2
If paid annually in advance	27	28	3.7
Continuation in force of an existing or restricted licence:			
If paid 5 years in advance	134	141	5.2
If paid annually in advance	27	28	3.7
Application to vary an existing standard or restricted licence	102	108	5.9
Vehicle disc fee:			
If paid 5 years in advance (per disc per month)	5.75	6	4.3
If paid annually in advance (per disc per month)	6.50	7	7.7
Application for a special licence (holder of taxi licence)	53	56	5.7
Continuation in force of an existing special licence	53	56	5.7
Issue of a duplicate disc to replace a lost one	14	15	7.1

BUS SERVICE REGISTRATION

	Current	Proposed	% fee increase
Application to register a bus service	51	54	5.9
Application to vary a registered bus service	51	54	5.9
Application to register a community bus service	11	12	9.1
Application to vary a registered community bus service	11	12	9.1

BUS PERMIT FEES

	Current	Proposed	% fee increase
Small bus permit	10	11	10.0
Large bus permit	19	20	5.3
Community bus permit	50	53	6.0

PSV TYPE CERTIFICATE

	Current	Proposed	% fee increase
Regulation 50 (c)	3010	3176	5.5
Regulation 50 (a)	1407	1484	5.5
Regulation 50 (b)	695	733	5.5
Regulation 50 (a) minor changes	129	136	5.4
Certificate of Conformity	27	28	3.7
Duplicate Certificate	19	20	5.3

CERTIFICATE OF INITIAL FITNESS

	Current	Proposed	% fee increase
Initial Inspection	243	256	5.3
Re-inspection	29	31	6.9
Tilt re-test	243	256	5.3
Duplicate certificate	19	20	5.3

DDA ACCESSIBILITY CERTIFICATE

	Current	Proposed	% fee increase
One schedule	43	45	4.7
Retest for one schedule	15	16	6.7
Two schedules	85	90	5.9
Retest for two schedules	30	32	6.7

TACHOGRAPH CALIBRATION CENTRES

	Current	Proposed	% fee increase
Approvals	311	328	5.5
Annual Renewal	127	134	5.5

REDUCED POLLUTION CERTIFICATE

	Current	Proposed	% fee increase
With annual test	16	17	6.3
Not with annual test	27	28	3.7
Out of Hours Supplement	16	17	6.3
DP Supplement	27	28	3.7

SINGLE VEHICLE APPROVAL**Passenger Vehicles**

		Current	Proposed	% fee increase
1	Basic SVA test (or appeal test) – Classes N, P, T, M, A, C, S, L, D	150	158	5.3
2	* E Certificate	60	63	5.0
	Enhanced SVA - Classes D and R			
3	Enhanced SVA test with Model Report	190	200	5.3
4	Enhanced SVA test without Model Report	180	190	5.6
5	* E Certificate & ESVA test with Model Report	100	106	6.0
6	* E Certificate & ESVA test without Model Report	90	95	5.6
7	ESVA for new vehicle with European Community (EC) Type Approval	30	32	6.7
	SVA or Enhanced SVA			
8	Retest	30	32	6.7
9	Charge for failure to attend a test or refusal to test by the examiner	50	53	6.0
10	Replacement Certificate	10	11	10.0
	Out of hours supplements			
	Inspections 1, 3 & 4	75	79	5.3
	Inspections 2, 5, 6 & 7	20	21	5.0
	Retests 8	15	16	6.7
	Goods Vehicles			
11	Basic SVA test (or appeal test) - Classes N,P,T,M,A,C,S,L,D	60	63	5.0
12	* E Certificate	60	63	5.0
	Enhanced SVA - Classes D and R			
13	Enhanced SVA test with Model Report	100	106	6.0
14	Enhanced SVA test without Model Report	90	95	5.6
15	* E Certificate & ESVA test with Model Report	100	106	6.0
16	* E Certificate & ESVA test without Model Report	90	95	5.6
17	ESVA for new vehicle with European Community (EC) Type Approval	30	32	6.7
	SVA or Enhanced SVA			
18	Retest	15	16	6.7
	Charge for failure to attend a test or refusal to test by the examiner	50	53	6.0
	Replacement Certificate	10	11	10.0
	Out of hours supplements			
	Inspections 11, 13 & 14	25	26	4.0
	Inspections 12, 15, 16 & 17	20	21	5.0
	Retests 18	6	6	0.0

Motorcycles

	Current	Proposed	% fee increase
Low Power Moped (A moped with pedals, with auxiliary propulsion not exceeding 1 kW, and a maximum design speed not exceeding 25 km/h [16 mph].)	45	47	4.4
Two-wheeled Vehicle (including motorcycle and sidecar)	70	74	5.7
Three-or Four-wheeled Vehicle	85	90	5.9
Out of Hours Supplement	20	21	5.0
Retest	15	16	6.7
Duplicate/replacement Certificate	10	11	10.0

Partial Regulatory Impact Assessment

- **Title of proposal**

Increases averaging 5.5% in VOSA Fees for HGV and PSV Testing and Inspections; Operator Licensing; Bus Registration; Tachograph Centre Approval; and Single Vehicle Approval

- **Purpose and intended effect**

- Objective

To ensure that the cost of providing the services listed below is matched by the income from fees and charges:

- tests and re-tests of HGVs and PSVs;
- specialised inspections of HGVs and PSVs;
- operator licences for HGV and PSV operators;
- bus registration and permits;
- examinations for Single Vehicle Approval.

Overall, we propose to increase fee income in line with operating cost increases affecting VOSA's costs for these services over the 20 month period from August 2006 (the end of the period covered by the previous increase implemented on 30 September 2005) until April 2008 (the planned implementation date of our next fee review). As is our normal practice, we propose to round fees generally to the nearest pound. As a result some fees increase by more than the average figure whereas some increase by less or do not increase at all.

- **Background**

Between 2003 and 2005, VOSA increased most fees at above-RPI rates in order to realign fees to reflect the work involved and to fund the start of various programs to provide improved customer services by refurbishing test stations and providing increasing levels of e-enabled services. This was fully explained in consultations prior to the September 2005 increases. Many of these improvements involved long term commitments to fund ongoing services, invest in major capital works and to start to repay loans for capital work already carried out. The costs of these long term commitments have to be covered by fee income.

VOSA is also carrying out a programme of value for money improvements aimed at delivering services more effectively in the longer term in line with Government targets for headcount reduction. The savings from this are being invested in various projects to improve customer services, facilities and improved effectiveness in targeting non-compliant vehicle users.

VOSA has also had to provide for increases in pay and pension costs in line with Government policies.

Despite these measures, VOSA's costs of service provision will not be fully covered by fees income based on projected fee income if no increases are made. The Government Trading Fund Act 1973, as amended, requires that VOSA is managed "so that the revenue of the fund ... is not less than sufficient, taking one year with another, to meet outgoings". Therefore some action is needed to close the gap that would otherwise arise.

- **Rationale for government intervention**

Without the proposed fee changes, the VOSA Trading Fund would fail to meet its obligation to cover its costs.

- **Consultation**

- Within government

VOSA have consulted, or will consult, DVO and DfT Finance, DTI Small Business Service, Treasury (for those fees for which their agreement is required - ADR, TIR and Tachograph Calibration Centre approval) and the Scottish Executive (for bus service registration fees in Scotland)

- Public consultation

An extensive consultation is taking place of stakeholders representing those who will be directly affected by the fee changes. This consultation will also be published on the Internet.

- **Options**

Option 1: raise the fees as per the proposal.

Option 2: seek DfT subsidy for VOSA's operating costs.

One of the aims in establishing VOSA as a Government Trading Fund was to ensure that the costs of providing services were met by those using the services. For this reason subsidy from general taxation is not considered generally appropriate for the running costs of services covered by the fees included in this proposal.

Option 3: reduce VOSA's cost base at a rate considerably greater than planned.

VOSA is engaged in a continuing programme of value for money savings to improve the effectiveness and efficiency of the services we provide. In the consultation for the 2005 fee increases and in our 2006/7 Business Plan, VOSA stated that value for money savings would be used to deliver improved services and allow an accelerated programme of investment in IT, e-services and facilities. We intend to continue this process in 2007/8 to make compliance easier for our customers and minimising our impact on our customers who meet the necessary requirements for compliance. We further intend to ensure that our facilities are suitable to meet the present and future needs of our customers.

- **Costs and benefits**

- **Sectors and groups affected**

The following customer sectors and number of customers will be directly affected by the increases in fees and charges.

Customer sector	Volumes	Approximate numbers
HGV	Operators	102,000
	Tests (including retests)	875,000
	ADR tests	4,000
	TIR inspections	300
Bus	PSV Operators	9,000
	PSV Tests (including retests)	92,500
	CoIF	7,500
	DDA certificates	2,600
	Permits	2,100
HGV & Bus	Service registrations	24,000
	Tachograph Centres	550
	Reduced Pollution Certificate	44,000
Light Vehicles	SVA tests (including retests)	36,000

- **Benefits**

Option 1: This option will enable VOSA to continue to provide service levels and to invest in the service enhancements planned.

Option 2: This would not only move away from the long established principle that the costs of VOSA services should, wherever possible, be met by those who use the services. In addition, assuming no additional funding from taxation, DfT would have to abandon, reduce or postpone expenditure in other priority areas. Given the unlikelihood that such funding would be forthcoming, this option can be discounted.

Option 3: VOSA is already making efficiency savings in its operation. As explained earlier, these savings are being invested in improved customer services and facilities. To cut costs further we would not only have to greatly reduce development of services but waiting times and turnaround times for existing services would be likely to become much longer.

- **Costs**

Option 1: The fee increases are intended to yield an overall additional income of 5.5% on affected fees. This equates to £5.7 million in the financial year 2007/8. As has been our practice we propose to round fees to the nearest pound, thus individual fee increases may be greater or less than the 5.5% average.

In absolute terms, the cost of testing and licensing is very small in comparison with the cost of buying and operating a vehicle. The cost of a new 7.5 tonne vehicle is of the order of £25 to 30k. Typical operating costs, for 20,000 miles per year, are about £44k or £2.20 per mile. The proposed testing and licensing fee increases for a conforming operator with 1 such vehicle would increase their operating costs by £9 per annum – an increase of 4.7% in VOSA fees but representing about 0.02% of total operating costs.

Option 2: The cost of this option to VOSA service users could be anything between zero and the cost of option 1 depending on how much subsidy was provided. However, they, or others, may well face additional costs in other areas from which the money had been diverted.

Option 3: As with option 2 the increased cost of VOSA services could be anything between zero and the cost of option 1. However, service users could well face loss of earnings because of longer waiting times or slower turnaround times significantly in excess of the costs of option 1.

- **Small Firms Impact Test**

Over half of all licensed operators operate between 1 and 5 vehicles, so a large proportion of the businesses affected by the cost increases are small businesses.

A significant number of small businesses are being consulted either directly or through their membership of the Trade Associations. The consultation has also been publicised in a press notice and is accessible on various relevant Government websites.

The impact of the higher fees is proportionate, not unduly penalising one business more than another - the majority of increases being in direct proportion to the number of vehicles operated, licensed or inspected. The likely burden on small businesses will not be any more onerous, in relation to its size, than it would be for a larger business. Small businesses will therefore not be unduly disadvantaged.

- **Competition assessment**

In terms of competition, the introduction of higher fees and charges for services will not affect the balance of the relevant industries in Great Britain. The increases in fees will apply to all operators and presenters equally whether large or small. The increases would have minimal impact on the competitiveness of GB service users in relation to users of similar services based overseas.

- **Enforcement, sanctions and monitoring**

VOSA enforces payment of fees by requiring the fee to be paid before the test or inspection of the vehicle; or the application for the service is processed. The tachograph authorisation fee will be collected before authorisation is granted; the re-authorisation fee on the other hand is collected at the beginning of each year. Centres that do not pay up will ultimately have their authorisation withdrawn, after a period of warning. The effect of the proposed amendments will be monitored and reviewed by the Chief Executive (as Accounting Officer for the Agency) and by the National Audit Office when signing off the Agency's annual accounts.

Partial Regulatory Impact Assessment

1. Motor Vehicles (Approval) (Fees) Regulations 2001 – inclusion of an additional fee

2. Purpose and intended effect

- Objective

To introduce a new application fee for a Minister's Approval Certificate (MAC) within the Single Vehicle Approval (SVA) scheme for the case of a new passenger or goods vehicle which has European Community type approval but for which a certificate of conformity cannot be issued.

- Background

These circumstances, can occur when an approved vehicle was destined for a non-European market. They can also occur when a manufacturer is unable to issue a Certificate of Conformity (because of a modified Directive) but is permitted to produce the small number of remaining vehicles in a production run to the previous Directive requirements under the "end of series" provisions. Dealing with such an application involves less work than other cases.

Following representations from customers, VOSA introduced a reduced charge for this activity in agreement with the DfT. This measure seeks to incorporate that charge in a statutory fee in the same manner as other fees for other classes of single vehicle approval. VOSA received 750 applications for MACs in these circumstances in the last year for which figures are available.

- Rationale for government intervention

This measure does not increase the extent of government intervention in any way, it only seeks to regularise the basis of these charges for providing this service.

3. Consultation

- Within government

Transport and Technology Standards Division of the Department for Transport

- Public consultation

Public consultation to be carried out as part of a more general consultation on fees increases.

4. Options

Option 1: Continue with the present non-statutory charge for the issue of a Minister's Approval Certificate in these circumstances. This charge would be increased in line with other statutory fees.

Option 2: Incorporate the existing charge, increased in line with other fees, in regulation.

Option 3: Revert to charging the most appropriate of the fees currently covered by the regulations.

5. Costs and benefits

- **Sectors and groups affected**

Mainstream motor vehicle manufacturers making use of the “end of series” provisions within Type Approval. Independent vehicle importers sourcing vehicles from outside of the EU. Private individuals sourcing a vehicle from outside of the EU which does not qualify for “Personal Import” status.

- **Benefits**

All options will continue to enable customers to apply for approval of their vehicles. We currently identify 14 differing levels for charging purposes.

Option 1 leaves the present untidy situation of having 13 of the charges in the regulations and 1 charge outside the regulations.

Options 2 and 3 regularise this situation, though the latter increases costs for no additional benefit.

- **Costs**

Options 1 and 2 would be cost neutral in real terms. The effects of fee increases in line with other fees would be the same in both cases.

Option 3 would increase costs of each application by between 200% and 533% depending on which of the fees currently specified in the regulations was the most appropriate to be applied.

6. Small Firms Impact Test

Options 1 and 2 have no impact since the processes of determining an application would be unaltered and costs neutral in real terms. Since the charges relate directly to the number of applications made, the effects would be proportional to the volume of business conducted by the applicant.

Option 3 would increase costs for all businesses but again these increases would relate directly to the number of applications made and be in proportion to the volume of business conducted.

This has not been specifically tested on small firms, though the representative bodies included in the consultation include many small firms amongst their members.

7. Competition assessment

Options 1 and 2 would have no impact on competition. Option 3 would make those businesses which currently use the single vehicle approval system in these circumstances less competitive.

8. Enforcement, sanctions and monitoring

This measure regularises the omission of a fee from regulations. There is no need for enforcement. Sanctions are self imposed – if the fee is not paid the service is not delivered. Fee levels are monitored on a regular basis – normally annually – to ensure that fees recover the costs of the service provided.

Partial Regulatory Impact Assessment

1. International Carriage of Dangerous Goods by Road (Fees) Regulations 1988 – inclusion of an additional fee

2. Purpose and intended effect

- Objective

To introduce a new application fee for an ADR (international carriage of dangerous goods) Vehicle Approval Certificate where no physical inspection of the vehicle is required

- Background

The International ADR accord requires certain vehicles to be issued with an approval certificate prior to their use for dangerous goods transport and annually thereafter. Hitherto this required a physical inspection of the vehicle in all cases. A new provision in the agreed amendments to ADR in 2007 allows a first ADR approval certificate to be issued to some vehicles without physical inspection if the manufacturer holds an approval for the vehicle type and issues a declaration of conformity. This is provided that no alteration has been made to the vehicle since that declaration. The 2007 amendment relates only to tractor units for semi-trailers. The requirement for vehicles to comply with ADR in Britain is referenced in the separate Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2004. The 2007 level of ADR is expected to become effective in Britain from 1 July 2007 provided referencing amendments to the 2004 Carriage etc Regulations come into force on that date.

The current fee is set to cover a combination of paper checks and physical inspection. We propose to introduce a new fee to reflect the cost of the information gathering, certificate printing and validation administrative elements of the ADR certification without having to provide for the test station facilities and inspection labour elements. We assess the cost at £25.

- Rationale for government intervention

This measure does not increase the extent of government intervention in any way. It seeks to pass on to customers the cost savings enabled by the changes to the International ADR accord.

3. Consultation

- Within government

Dangerous Goods Unit of the Department for Transport

- Public consultation

Public consultation to be carried out as part of a more general consultation on fees increases.

4. Options

Option 1: Do nothing to take advantage of the revised ADR accord and continue to physically inspect all vehicles and levy full ADR inspection and certification fees even if new vehicles are declared as ADR compliant.

Option 2: Consider that the inspection requirement is satisfied by examination of documentation in appropriate circumstances following the new International ADR accord and levy the full statutory fee for ADR certificate issue.

Option 3: Consider that the inspection requirement is satisfied by examination of documentation in appropriate circumstances following the new ADR accord and levy a reduced non-statutory fee of £25 for ADR certificate issue. As a non-statutory fee we would have to charge VAT on the £25.

Option 4: Revise the regulations to provide a statutory fee of £25 and specific power to issue an ADR certificate without physical inspection in line with the new International ADR accord.

5. Costs and benefits

- **Sectors and groups affected**

Heavy goods motor vehicle manufacturers, importers and dealers. Carriers of dangerous goods.

- **Benefits**

Option 1 will continue to deliver existing services.

Option 2 reduces the burden on some applicants for ADR certification by removing the requirement to present vehicles with a Declaration of Conformity at a VOSA testing station prior to placing them in service.

Option 3 reduces both the burden of inspection and the fee levied but introduces the unsatisfactory situation of a non-statutory fee, subject to VAT within an otherwise regulated fee structure on which VAT is not charged.

Both options 2 and 3 also rely on an interpretation that an ADR “inspection” can consist entirely of an examination of documentation without reference to the condition of the actual vehicle and thereby reduces pressure on the relatively limited VOSA facilities for ADR inspection.

Option 4 recognises formally that there is no need to burden operators of new ADR vehicles which have a Declaration of Conformity with presentation for physical inspection where this is not required by the International ADR accord and thereby also reduces pressure on VOSA ADR test resources. The creation of a statutory reduced certification fee would keep it aligned with other statutory fees charged by VOSA.

- **Costs**

Option 1 would be cost neutral in real terms.

Option 2 would remove presentation costs for relevant vehicles which can exceed £100 but would leave a disproportionately high certification application fee.

Options 3 and 4 would remove presentation costs as option 2 but would also reduce the cost of application for relevant vehicles by approximately 70%.

Options 2,3 and 4 would require vehicle manufacturers to issue Declarations of Conformity with associated administration cost for them but would also potentially allow relevant vehicles to be placed in service sooner than would otherwise be the case. Should any manufacturer be unable or unwilling to issue a Declaration of Conformity, it would still be possible, on application by the manufacturer, or owner of the vehicle, to issue an ADR approval certificate following a successful physical inspection for the application fee appropriate to that means of certification.

6. Small Firms Impact Test

Option 1 would have no impact, other than to deny possible cost reductions, since the processes of determining the application would be unaltered and would be cost neutral in real terms.

Options 2, 3 and 4 would provide significant reductions in cost and reduce the delay in placing relevant new vehicles in service.

In all cases, the impact is directly proportional to the number of vehicles being certified, so has no differential impact on small businesses.

This has not been specifically tested on small firms, though the representative bodies included in the consultation include many small firms amongst their members.

7. Competition assessment

Option 1 and 2 would have no effect on competition between British operators but could make them less competitive against operators from countries which took advantage of the new provision of the accord.

Options 3 and 4 would maintain the competitive position of British operators against operators from countries which took advantage of the new provision. Any manufacturer who did not provide the necessary Declaration of Conformity would put themselves and their customers at a competitive disadvantage. Additionally parties that chose to modify new vehicles after declaration would not be able to benefit from the reduced cost and delay. The measure itself would be effective for all applicants.

8. Enforcement, sanctions and monitoring

This measure recognises a change to an international accord to which Britain is a signatory and provides a necessary new fee and process in regulations. There is no need for enforcement. Sanctions are self imposed – if the relevant Declaration of Conformity is not provided then the service at a reduced fee will not be delivered. Fee levels are monitored on a regular basis – normally annually – to ensure that fees recover the costs of the service provided.

Partial Regulatory Impact Assessment

1. Title of proposal

Add the inspection of VIN and registration plates to MOT tests for Class V & VA

2. Purpose and intended effect

- Objective

The main objective is to ensure that the inspection of VIN & registration details is carried out uniformly across all classes in the MVTR with the exclusion of Class VI & VIA.

- Background

Almost all vehicles are required to have some form of identification (numbers, letters or a combination of both) permanently marked on the vehicle. Depending on the type and age of the vehicle this may be called the chassis number, frame number or Vehicle Identification Number (VIN). The format of the latter has to comply with international standards. Throughout this document, the term VIN will be used to describe all such identification marks.

Registered vehicles are also required to display the vehicle registration mark (VRM) allocated to the vehicle. Where this is a UK mark, the size, style and colours of the plate used to display it are specified in the appropriate regulations.

As part of the MOT test, these details are used as the primary means of identifying the vehicle and recorded on test documentation. Vehicles which have neither VRM nor VIN displayed cannot be tested.

The MOT test includes checks on the presence of a VIN and key aspects of the legality of the registration plates, where they are required (e.g. registration plate checks are not carried out on non-UK registered vehicles), for most classes of vehicle. Currently there are no powers for this check on private passenger vehicles with more than 12 passenger seats (class V and VA). Therefore even though they are obviously wrong, a test certificate cannot be refused. .

- Rationale for government intervention

DfT, DVLA and the Police are concerned that vehicle identities may be 'hidden' due to incorrectly formed registration numbers thus diluting the benefits of safety cameras; enabling avoidance of congestion charges; etc. They are also concerned that the lack of checking of VINs may also be a missed opportunity in the fight against vehicle related crime.

3. Consultation

- Within government

VOSA have consulted or will consult with DVO, DfT and DTI Small Business Service.

- Public consultation

Draft RIA – Addition of registration plates and VIN for class V and VA tests **Annex E**

An extensive public consultation is taking place of stakeholders representing those who will be directly affected by the proposed changes. The consultation will also be published on the internet.

4. Options

Two possible options have been identified:

Option 1: Maintain the current arrangements and do not check the compliance of VIN and registration plates on these classes of vehicle.

Option 2: Introduce changes as proposed

5. Costs and benefits

- **Sectors and groups affected**

The proposed change will affect all class V and VA 'private' buses. This includes vehicles owned by private individuals, businesses, charities and public bodies. Approximately 45,000 of the 23 million MOT tests per year will be affected.

Just under 1,000 testing stations are authorised to test class V and VA, employing around 2600 testers.

- **Benefits**

Option 1: This offers no benefits.

Option 2: This option will address the concerns of DfT, DVLA and Police and ensures that Class V and VA vehicles are treated in the same manner as other 'MOT' classes.

- **Costs**

Option 1: Nil

Option 2: Whilst the VRM and VIN are recorded for identification purposes, We estimate that 0.3 min to carryout the more rigorous checks on registration plates and record the few failures will be added to the inspection. This equates to about 27p per test in the affected classes at present rates (September 2006). This would normally be factored in to the normal fee review process.

6. Small Firms Impact Test

The impact of the small additional cost is proportionate to the number of vehicles being tested and therefore does not unduly affect one business more than another. The likely burden on small businesses will not be any more onerous, in relation to its size, than it would be for a larger business. Small businesses will therefore not be unduly disadvantaged.

Draft RIA – Addition of registration plates and VIN for class V and VA tests **Annex E**

A significant number of small businesses are being consulted either directly or through their membership of the Trade Associations. The consultation has also been publicised in a press notice and is accessible on various relevant Government websites.

7. Competition assessment

This measure will have no effect on the competitiveness of vehicle operating firms that comply with the existing law.

All testing stations that test vehicles of the relevant classes will be affected in the same way and in proportion to the number of relevant vehicles tested; therefore the effects on competition will be neutral.

8. Enforcement, sanctions and monitoring

The measure is itself an enforcement measure. Vehicles which are non-compliant will fail their annual test and face the normal sanctions for that non-compliance. It is not expected that this measure will have any significant effect on rates of compliance with the need to have a test certificate.

Enforcement of the correct application of the new test element by MOT testers will be included in the existing arrangements covering authorised MOT testing garages and testers. Those garages and testers found to be non-compliant in checking this new test element will receive advice or sanctions up to the removal of their authority to test depending on the circumstances of the particular case.

Monitoring the effectiveness of adding these additional elements to the MOT test will be included in the normal processes to monitor the effectiveness of the testing regime.

Partial Regulatory Impact Assessment

1. Title of proposal

Include the inspection of speed limiting devices on private minibuses with 9-12 passenger seats.

2. Purpose and intended effect

- Objective

The objective is to include a check on speed limiters as part of GB's measures to meet the requirements of Directive 2002/85/EC.

- Background

Directive 2002/85/EC amends Directive 92/6/EEC and extends the requirement to have a speed limiter set to 100 km/h to passenger vehicles with 9 or more passenger seats. The directive also stipulates that speed limiters fitted to these vehicles meet technical requirements set out in Directive 92/24/EEC, including the requirement to have set speed indicated on a plate in a conspicuous place in the driver's compartment of the vehicle. The Directive requires:

- vehicles first used between 1 October 2001 and 30 December 2005 to be fitted by:
 - 1 January 2006 if used on international journeys; and
 - 1 January 2007 if used only within the UK;
- vehicles first used on or after 1 January 2005:
 - from new if used on international journeys; and
 - by 1 January 2008 if used only within the UK.

The Directives also requires Member States to take measures to ensure compliance.

A significant element of the measures to ensure compliance is to check, during the MOT test, that the required 'calibration' plate is fitted. Test content for passenger vehicles is specified within the Motor Vehicles (Tests) Regulations 1981, as amended (MVTR). Currently speed limiter checks are included for classes V, VA, VI and VIA since many vehicles in these classes have needed speed limiters for some time and those additional vehicles can be checked under present powers. Directive 2002/85/EC extends the speed limiter requirement to some minibuses in class IV, so it is necessary to alter MVTR to empower checking of the speed limiter plate for these vehicles.

The change should not affect vehicles in class IVA as vehicles of this age are required to have type approved seat belt installations so an 'A' class test does not apply.

- Rationale for government intervention

Intervention is necessary to fulfil our obligations to implement the EU directive.

3. Consultation

- Within government

VOSA have consulted or will consult with DVO, DfT and DTI Small Business Service.

- Public consultation

An extensive public consultation is taking place of stakeholders representing those who will be directly affected by the proposed changes. The consultation will also be published on the internet.

4. Options

Three possible options have been identified:

- Option 1** Maintain the current arrangements;
- Option 2** Introduce changes in before January 2008
- Option 3** Introduce change in January 2008

5. Costs and benefits

- **Sectors and groups affected**

We expect about 50,000 of the 23 million MOT tests to be affected by this change. Ownership and use of these vehicles would be spread between private individuals, businesses, charities and public bodies.

The majority of the 18,400 test stations and 55,000 testers will also be affected.

- **Benefits**

Option 1: This would mean that GB did not ensure it complied with European law and is therefore not regarded as acceptable.

Option 2: At first glance this option would seem to ensure maximum compliance. However, due to transitional provisions which have the effect of delaying the application of the requirement for a vehicle to be fitted with a speed limiter (dependent on whether the vehicle is to be used for national or international operations) it would pose major practical difficulties for testers to have to determine the use of the vehicle being tested. As a general principle we expect testers to make decisions based construction, age and condition of vehicles rather than their use. We do not consider the case here to be sufficiently strong to change that approach.

Option 3: We believe is the best option as all vehicles of the type specified are required to be fitted with the speed limiting device by this date.

- **Costs**

Costs of fitting and calibrating speed limiters and bringing them back to the required standards, should they fail the MOT test, are not considered in this RIA since those requirements are not being changed.

Option 1: On the face of it this appears to be a zero cost option. However, without the check, levels of non-compliance may be greater leading to the possibility of fines to other penalties for those detected as being non-compliant. Higher levels of non-compliance might lead to more road traffic accidents, or more serious consequences where such accidents occurred, with the associated costs.

Options 2 & 3: The time taken for a visual check of a plate in a prominent position is expected to be no more than a few seconds per vehicle. Only about 50,000 of the 23 million vehicles tested annually will need the check so we do not consider that the change will have any significant effect on test costs or fees.

6. Small Firms Impact Test

This measure will have no impact on small firms which comply with the law.

The public consultation exercise mentioned above includes many small firms either directly or through their representative bodies.

7. Competition assessment

This measure will have no effect on the competitiveness of firms operating within the law.

8. Enforcement, sanctions and monitoring

The measure is itself, an enforcement measure. Vehicles which are non-compliant will fail their annual test and face the normal sanctions for that non-compliance. It is not expected that this measure will have any significant effect on rates of compliance with the need to have a test certificate.

Enforcement of the correct application of the new test element by MOT testers will be included in the existing arrangements covering authorised MOT testing garages and testers. Those garages and testers found to be non-compliant in checking this new test element will receive advice or sanctions up to the removal of their authority to test depending on the circumstances of the particular case.

Monitoring the effectiveness of the measure will be included in the normal processes to monitor the effectiveness of the testing regime.

Code of Practice on Consultation

The Government has adopted a code of practice on consultations. The code of practice applies to all UK public consultations by government departments and agencies, including consultations on EU directives.

Though the code does not have legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community Law), it should otherwise generally be regarded as binding unless Ministers conclude that exceptional circumstances require a departure.

The code contains six criteria. They should be reproduced in all consultation documents. There should be an explanation of any departure from the criteria and confirmation that they have otherwise been followed.

Consultation criteria

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.
2. Be clear about what your proposals are, who may be affected, what questions are being asked and the time-scale for responses.
3. Ensure that your consultation is clear, concise and widely accessible.
4. Give feedback regarding the responses received and how the consultation process influenced the policy.
5. Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator.
6. Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate.

A full version of the code of practice is available on the Cabinet Office web-site at:

<http://www.cabinet-office.gov.uk/regulation/consultation/code.asp>

If you consider that this consultation does not comply with the criteria or have comments about the **consultation process** please contact:

Andrew D Price
Consultation Co-ordinator
Department for Transport
Zone 9/9 Southside
105 Victoria Street
London, SW1E 6DT

email: Consultation@dft.gsi.gov.uk

List of Consultees

A Culpin & Son Ltd
AA Driving School
AA Foundation of Research
AA Legal Services
AA Service Centres
Aaron & Partners
ACPO
ACPO Scotland
ADE Systems
ADI
ADI Business Club
ADI Foundation
Advanced Vehicles Builders
Age Concern Cymru Wales
Age Concern England
Age Concern Scotland
Agricultural Engineers Association
Alliance of Independent Retailers Ltd
Ambulance Service Association
American Car Imports
Analyze UK
Approved Driving Instructors
Arriva PLC
Assembly Technology & Test Ltd
British Motorcyclist Federation
Gloucestershire County Council
Assoc British Dispensing Opticians College
Assoc. High Pressure Water Jetting Contractors
Assoc. London Borough Road Safety Officers
Assoc. Street Lighting & Electrical Contractors
Association of Vehicle Recovery Operations
Association of British Drivers
Association of British Insurers
Association of British Insurers (NI)
Association of British Motor Clubs
Association of Car Fleet Operators
Association of Industrial Road Safety Officers
Association Of London Authorities
Association of Magisterial Officers
Association of MOT Consultants
Association of Optometrists
Association of London Government
Autocal Ltd

Autocraft Equipment Ltd
Autodata Ltd
Autologic
Automobile Association
Avon & Somerset Constabulary
Blaby District Council
BMI Health Services (Incorporating OHSA)
BRAKE

British Agricultural & Garden Machinery Assoc.

British Association for Service to the Elderly

British Association of Removers

Annex H

Leyeshurst
Lifting Equipment Engineers Association
Lincolnshire County Council
Liverpool City Council
Local Authorities Road Safety Officers Assoc.
Local Government Association
Local Government Information Service
London Ambulance Services
London Private Hire Car Association
Lord Chancellor's Division
Magistrates' Association
MAHA UK Ltd
Direct Line Group
Master Engineering srl
Maverick Technology UK Ltd
Metrobus
Metropolitan Police Organised Crime Group
Military Vehicle Trust
Ministry of Defence
Mobility Advice & Vehicle Info. Services
MOT Tester & Authorised Examiner
MOTest UK Ltd
Motor Association of British Insurers
Motor Caravanners Club
MIRA
Motor Insurance Repair Research Centre
Motor Insurers Bureau
Motor Schools Association
Motor Vehicle Dismantlers Association
Motorcycle Action Group
Motorcycle Industry Association
Motorcycle Retailers Association
Motorcycle Rider Training Association
Motoring Research Consumer Association
Motorists Forum (Secretariat)
Motorway Tyres & Autocentres
Muscular Dystrophy Campaign
MVRA Ltd
N C Consulting
National Assembly for Wales
National Assn of Citizens Advice Bureau
National Assoc Agricultural Contractors
National Association of Local Councils
National Association of Taxi & Private Hire
Licensing Enforcement Officers
National Caravan Council
National Consumer Federation
National Council for Civil Liberties
National Council for Voluntary Organisations
National Crime Intelligence Service
National Express Group PLC
National Farmers Union
National Federation of Self Employed and Small
Businesses
National Guild of America Vehicle Clubs and
Traders
National Joint Committee for Young HGV
Drivers

List of Consultees

British Car Auctions Ltd (formerly ADT Auctions)
British Chamber of Commerce
British Deaf Association
British Epilepsy Association
British Independent Motor Trade Association
British Industrial Truck Association
British Medical Association
British Motorcyclists Federation
British Parking Association
British Safety Councils
British School of Motoring
British Vehicle Rental & Leasing Association
British Vehicle Salvage Federation
BSI Product Services

Buckinghamshire County Council
Builders Merchants Federation
Bus & Coach Council
Calibration & Repair Services Ltd
Campaign Against Drink Driving
Casework Services Div - Policy
CBS Whitton Ltd
Centrax Ltd
Century Salvage Sales Ltd

Charity Law Association
Chartered Institute of Transport
Chartered Institution of Waste Management
Chemical Industries Association
Equality Commission for N.Ireland
Chief Fire Officers Association
Metropolitan Police

Chief Road Safety Education Officer
Child Accident Protection Trust
Citizen Advice (Scotland)
Civil Service Motoring Assoc
Coach Association
Coach Monthly
Coach Operators Federation
Collins Motors
Commercial Motor
Commission for Local Admin. In England
Community & Youth Workers Union
Community Matters
Community Transport Association
Confederation of British Industry
Confederation of British Industry - Scotland
Confederation of Passenger Transport
Construction Equipment Association
Construction Plant Hire Association
Consumers Association
Contractors & Mechanical Plan Engineers
Convention of Local Authorities
Convention of Scottish Local Authority
Correspondence Department Operations
Council of Civil Service Unions

Annex H

National Limousine Association
National Parking Adjudication Service
National Playbus Association
National Private Hire Association
National Safety Council
National Salvage Group
National Street Rod Association
National Taxi Federation
National Traction Engine Trust
National Trailer and Towing Association
National Tyres and Autocare
National Tyres Dist Assoc
National Union of Students
NCIS
North Wales Police, Operational Support Division
Northern Ireland Assembly
Nottinghamshire Rural Community Council
Oban Buses / West Coast Motors
Office of Fair Trading
Office of the Commissioner New Scotland Yard
Omitec Instrumentation Ltd
P J Services
Pabrex International
Parliamentary Advisory Committee on Transport Safety
Passenger Transport Executive Group
Pedestrian Association
Perkins Technology
PITO
PNC Directorate
Police Federation of England & Wales
Police Superintendents Association of England & Wales
Premier Diagnostics Ltd
Protech Automotive UK
Protech Instruments
Public & Commercial Services Union
Public Carriage Office
Pulleyn Transport Ltd
RAC Foundation
RAC Motor Sports Association
RAC Motoring Services
RAC Travel Services
Radamec Electronic Systems
Recruitment & Employment Confederation
Retail Motor Industry Federation
Retail Motor Industry Training
Richard Oliver Ltd
RJV International
Road Haulage Association
Road Rescue Recovery Association
Road Roller Association
DoE NI
Road Transport
Road Transport Association
Roadpeace

List of Consultees

County Road Safety Officer
County Surveyors Society
Crown Office
Crown Prosecution Service
Crypton
Dairy Trade Federation
Dispatch Association
Dept of Health
Dept of Transport
Dept Transport Highways & Traffic Division
Devon County Council
DfT Mobility Unit
Diabetes UK
Dieseltune Technology Ltd
South Gloucestershire Council
European Commission, DG TREN
Disabled Drivers Association
Disabled Drivers Motors Club
Disabled Motorist's Federation
Disabled Persons Transport Advisory Com.
District Wheelchair Service
Driver & Vehicle Licensing (NI)
Drivers Actions Movement
Driving Instructors Association
Driving Instructors Scottish Council
Environmental Services Association
Environmental Transport Association
Equity Finance
Essex County Council
Ford Motor Co Ltd
Green Flag Ltd
European Secure Vehicle Alliance
Experian Ltd
Federation of Kit Car Clubs
Federation of Ophthalmic & Dispensing Opt.
Federation of Small Businesses
Federation Passenger Transport Employer
Finance & Leasing Association
Fire Brigades Union London Region
First Group (Aberdeen)
FMI Ltd
Forum Mobility Centre
Forum of Private Business
Forum of Private Business in Scotland
Freight Shepherd Ltd
Freight Transport Association
Friends of the Earth
Garage Equipment Association
GEMCO (Garage Equipment Maintenance Co)
General Consumer Council for N.Ireland
General Medical Council
Glass' Information Services Ltd
Globeaid Ltd
Government of Gibraltar
Grampian Police
Gray and Adams Ltd
Greater Manchester Police

Annex H

Robert Bosch Ltd
ROSPA
Royal Association for Disability & Rehabilitation
Royal College of Nursing
Royal College of Ophthalmologists
Royal College of Physicians
Royal Mail
Royal Mail Logistic Solutions
Royal Soc for the Prevention of Accidents
Royal Society for the Prevention of Accidents
RSAC
Safety Training Advisory Council
Sagem SA
Saxon Junkalor GmbH
School of Engineering John Moores University
Scottish Accident Prevention Council
Scottish Community Transport
Scottish Consumer Council
Scottish Executive
Scottish Motor Trade Association
Scottish Police Federation
Senior Policy Officer Transport
Showmans Guild of GB
Sidlaw Automotive Services
SIRA Test and Certification
Slower Speeds Initiative
Small Business Service
Social Exclusion Offices
Society of Motor Manufacturers & Traders
St John's Ambulance
Stagecoach
States of Jersey
Stoneridge Electronics
Stones Garage
Strathclyde Police
Suffolk County Council
Sun Electric Europe
Sustrans
Sykes Pickavant Ltd
System Driving Training
Tecalemit Garage Equipment Co Ltd
TEN Automotive Equipment Ltd
The AA Motoring Trust
The Arthur Rank Centre National
The Caravan Club
The City and County of Swansea
The General Secretary
The Institute of Logistics & Transport
The Joint Mobility Unit Access Partnership
The MOT Club
The Motor Insurance Repair Research Centre
The National Assembly for Wales
The National Council for Women of GB
The Scottish Parliament
The Scottish Road Safety Campaign
Time Instruments
Trade Union Congress

List of Consultees

Guild of Experienced Motorists
Halfords Ltd, Marketing Dept
Hertford County Council
Health & Safety Executive
Heavy Transport Association
Historic Vehicle Assoc FIVA
Home Office
House of Commons Library
Independent Garage Association
Information Commissioner
Institute of Advance Motorists
Institute of Directors
Institute of HGV Driving Instructors
Institute of Highways and Transportation
Institute of Logistics & Transport
Institute of Race Relations
Institute of Road Safety Officers
Institute of Road Transport Engineers
Institute of Transport Administration
International Historic Vehicle Organisation
Joint Committee on Mobility for the Disabled
Justices Clerks Society
K&R Auto Services Ltd
Keep Death Off Our Roads
Keltruck Ltd
Kent County Constabulary
LACOTS
Law Courts
Law Society
Learn 2 Live
Learn and Live
Leeds City Council

Annex H

Trading Standards Institute
Transervice Ltd
Transport & General Workers Union
Transport 2000
Transport for London
Transport Research Laboratory
Transport Research Laboratory
UNISON
Uni-Tech UK Ltd
United Kingdom Accreditation Service (UKAS)
United Road Transport Union
University College of London
University of Birmingham
University of Surrey
VDO Kienzle UK Ltd
Vehicle Builders and Repairers Association
Vehicle Industry Consultants
States of Guernsey Traffic Committee
Vehicle Testing Services
Veteran Car Club
Vintage Motorcycle Club
Vintage Sports Car Club Ltd
Volvo Trucks (GB) Ltd
Wales Community Transport
Welsh Assembly Cabinet
Welsh Consumer Council
Welsh Local Association
West Sussex County Council
Which? Magazine
Wigan Council
Wolverhampton City Council
Worcestershire County Council

Legislation to be Amended

Annex I

HGV Test + notifiable alterations	Goods Vehicles (Plating and Testing) Regulations 1988	1988/1478
PSV test	Motor Vehicles (Tests) Regulations 1981	1981/1694
GV Operator Licensing	Goods Vehicles (Licensing of Operators) (Fees) Regulations 1995	1995/3000
PSV Operator Licensing	Public Service Vehicles (Operator Licensing) (Fees) Regulations 1995	1995/2909
Bus service registration - England and Wales	Public Service Vehicles (Registration of Local Services) Regulations 1986	1986/1671
Bus service registration - Scotland	Public Service Vehicles (Registration of Local Services) (Scotland) Regulations 2001	SSI 2001/219
Minibus + s.19 permits	Minibus and Other Section 19 Permit Buses Regulations 1987	1987/1230
Community bus permits	Community Bus Regulations 1986	1986/1245
ADR	International Carriage of Dangerous Goods by Road (Fees) Regulations 1988	1988/370
COIF - PSV Type certification	Public Service Vehicles (Conditions of Fitness, Equipment, Use and Certification) Regulations 1981	1981/257
Reduced Pollution Certificate	Road Vehicles (Registration and Licensing) Regulations 2002	2002/2742
Tachograph Centre Approval	Passenger and Goods Vehicles (Recording Equipment) (Approval of Fitters and Workshops) (Fees) Regulations 1986	1986/2128
TIR	International Transport of Goods under Cover of TIR Carnets (Fees) Regulations 1988	1988/371
SVA / ESVA	Motor Vehicles (Approval) (Fees) Regulations 2001 {Possibly Motor Vehicles (Approval) Regulations 2001}	2001/2486 {2001/25}
Motorcycle SVA	Motor Cycles Etc (Single Vehicle Approval) (Fees) Regulations 2003	2003/1960