



INSPECTION NEWS

for vehicle inspectors and certifiers



Kia ora,

With four million WoF inspections carried out by over 8,000 inspectors every year, I appreciate that you are the experts in assessing the safety of vehicles.

There has been an increase in inspecting organisation (IO) applications recently and, combined with the Transport Agency having intensified its scrutiny over IO and VI applications, processing times have increased. We recognise this has an impact on prospective business owners who wish to be granted IO authority.

You'll appreciate this intensified scrutiny is necessary. During the Transport Agency's regulatory compliance review where several WoF inspectors were immediately suspended,

upwards of 30,000 vehicle owners were provided a voucher and strongly encouraged to have their vehicle rechecked free of charge due to various safety concerns.

The Transport Agency is also strengthening entry requirements, across the board. Whether you're applying to become an IO, VI, be granted a TSL or a passenger (P) endorsement, the same level of scrutiny applies.

This does mean that people applying for appointment as an IO delegate will need to plan for longer timeframes. You'll find information and clarity around these timeframes and processes in this issue of *Inspection News*.

Kane Patena
General Manager Regulatory

CONDUCTING UNAUTHORISED INSPECTIONS

Recent investigations by the NZ Transport Agency's Regulatory Group have identified that some inspecting organisations have been permitting unauthorised people to conduct part or full vehicle inspections for the purposes of issuing a WoF or CoF.

Inspecting organisations and authorised vehicle inspectors are reminded of the requirements under section 2.1 of the Land Transport Rule: Vehicle Standards Compliance 2002 summarised as follows:

- Only vehicle inspectors and inspecting organisations (appointed by the NZ Transport Agency) may carry out inspection and certification activities
- Vehicle inspectors and inspecting organisations must carry out inspection and certification activities diligently and in accordance with the conditions of their appointment.

This information is repeated in the VIRM and Code of Conduct.

The NZ Transport Agency has and will continue to take firm regulatory action where these obligations are not being met.

Unauthorised people may contribute to the overall WoF and CoF process. Two of the more common situations are clarified as follows:

1. USING UNAUTHORISED 'ASSISTANTS'

Unauthorised 'assistants' are able to help the vehicle inspector, but the vehicle inspector must inspect the component and make a determination. For example, an assistant may:

- drive or manoeuvre the vehicle to enable the inspector to conduct the inspection. Note: Only an authorised vehicle inspector is permitted to conduct any road or brake test
- operate the vehicle controls under the direction of the vehicle inspector, for example operating the lights, applying the brakes, and shaking the steering wheel.

2. VEHICLE INSPECTOR IN TRAINING

A trainee may practice on a live inspection, provided that:

- the vehicle inspector is in the immediate vicinity of and is directly observing the trainee conduct each part of the inspection. The vehicle inspector must satisfy themselves that the trainee has inspected the component fully and made the correct determination, and
- the vehicle inspector conducts their own inspection after the trainee has finished, the vehicle inspector must make the final determination, and
- only the vehicle inspector completes the 'live' check sheet. The trainee may practice on another sheet or copy that is clearly marked as being for training purposes only.

ACCESSING WOF ONLINE

User access details and passwords must not be shared.

The Transport Agency answers your questions about IO applications

What are the IO authority changes and what does this mean?

We're now applying more scrutiny when assessing the details contained in an inspecting organisation (IO) application.

There are many checks and balances that we must assess. These include but are not limited to: fit and proper person assessments, quality management system requirements, and IO roles and responsibilities.

In the past, an application that explained 'what' a person would do to run a business as an IO was acceptable. Now we expect a person to explain in detail how they will fulfil their IO responsibilities. In short, the more information and confidence a person can provide our assessment team, the better.

We are looking to see that in addition to the right competencies, that a person is organised and able to effectively run a business, manage staff and be ethical in how they work.

You've told us you're concerned about the current IO applications timeframes. What are the reasons for these?

- We do more than just IO applications, the increased workload comes from a variety of applications including relocations and replacement authorisation documentation.
- Applying greater scrutiny to applications means that it takes us

more time to assess them, although it is important to note that timeframes have been in excess of 40 working days for several years and are currently in excess of 50 days.

- When we need to contact people to gather the detail on how they will undertake their IO role, this lengthens the processing time, so it's important to include these assurances in an application the first time around. There are increased volumes coming through, particularly around change of business ownerships.
- We're also working hard to clear a backlog of applications resulting from the regulatory compliance review.
- The building where our team that assess IO applications is based was evacuated on 13 June. The team continues to work remotely and are working hard to continue business operations under difficult circumstances.

What are we doing to address current timeframes?

First, timeframes will be longer than in the past due to the intensified scrutiny of applications and additional reasons mentioned above. However, we're making improvements and we will review the timeframes in six months.

- We've increased capability and capacity in our assessment team and are continuing to do so.

- We're updating the online application information so that is clear and easy to understand.
- We're also doing further work on the application process so that while still robust, it is as efficient as possible for applicants

Tips for applying

Please complete due diligence about what is involved in becoming an IO. Being well informed about what is required of you and what you need to include in your application is critical.

1. Make sure your supporting information is verifiable. The more information, the better. For example, provide proof of any qualifications.
2. Make sure that you limit any changes to your application once it is submitted. Any changes made will lengthen your application's processing time.
3. Please remember that you can't use someone else's ID – doing this could significantly impact your application.
4. We must assess each application as a 'fit and proper person' – be honest upfront as we do run checks with NZ Police.
5. All applications are considered on a case-by-case basis.

RECENT VIRM AMENDMENTS

Make sure you have kept your PRS/QMS up-to-date by keeping up with the latest VIRM amendments.

VIRM: IN-SERVICE CERTIFICATION

- 1 June 2019
 - Updates to images in the glazing section to assist vehicle inspectors
 - General information about spotting cracking failure in light trailers
 - Images to show how to spot a repaired Trailpro trailer
 - Change as a result of the [Land Transport Rule: Regulatory Stewardship \(Omnibus\) Amendment 2018](#). For insights behind the changes, you can read the [summary of submissions](#) document

VIRM: ENTRY CERTIFICATION

- 1 June 2019
 - Updates to the Annex C process including an update to the Annex C permit
 - Clarifications around wheelchairs and seating position numbers
 - Sleeping berths definition added
 - General clarifications
 - Change as a result of the [Land Transport Rule: Regulatory Stewardship \(Omnibus\) Amendment 2018](#). For insights behind the changes, you can read the [summary of submissions](#) document

Vehicles not to be used as small PSV if their rear doors are not readily openable

There are a few vehicles that, while they can be used as personal transport or as a rental vehicle, cannot be used as a small PSV due to the configuration of their rear doors. This is because the rear door cannot be opened from the interior unless the front door is opened first. This is a safety issue and is covered in the PSV Rule to allow for passengers to exit a vehicle after a crash or if they feel threatened by the driver.

Vehicles identified to date are BMW i3, Toyota FJ Cruiser and Mazda RX8.

If you are presented with one for these vehicles for entry certification as a small PSV, it should not be completed. If you are presented with one of these vehicles for a CoF as a small PSV (ie it has already gone through entry certification as a small PSV when it shouldn't), contact us at vehicles@nzta.govt.nz for advice.

The VIRMs will be updated in the future with this information.

Presentation of LT400s

There has been a change to requirements around the presentation of LT400s for entry certification.

Previously, all LT400s associated with a vehicle must be presented to an entry certifier for them to be able to complete the entry certification.

It is now acceptable to not present an LT400 if the information on that LT400 has already been entered into LANDATA by the heavy vehicle specialist certifier.

A QUESTION OF POWER

Although there's a common misconception that engine conversions within the same family of vehicle do not require LVV certification, this is not correct. LVV certification is required even when a vehicle has been fitted with a larger capacity engine from the same model vehicle, for example when a V8 engine is installed into a six-cylinder Commodore, or even a change from a 1300cc engine to 1500cc of an identical family.

POWER INCREASES

The question of when LVV certification is required for a power increase on the OE engine is one that's easily answered, yet often overlooked. In section **13-1 Engine and transmission** of the VIRM, it states LVV certification is not required if the modifications result in not more than 20 percent more power than the OE engine. This is simply translated as, if the vehicle has an increase in power of over 20 percent, then LVV certification is required.

As there is no simple way to accurately determine a 20 percent increase in power during a WoF inspection, vehicle inspectors are encouraged to contact LVVTA if they have any questions, or point out the applicable requirement in the VIRM to the vehicle owner if they believe the threshold has been exceeded.

FORCED INDUCTION

As per the wording on the Engine and Transmission page of the VIRM, 'LVV certification is always required for the fitting of a supercharger or turbocharger

as a modification, or the upgrading of a supercharger, turbo or wastegate, or the re-chipping of electronic engine control units (ECUs) on turbocharged vehicles.'

This includes converting a vehicle fitted with a factory twin turbo system to a single turbo. Part of the reason for this requirement is the potential for these types of modifications to have an impact on other parts of the vehicle. For example, LVV certification requires minimum distances that heat sources such as turbochargers and exhaust systems must be from steering and braking components.

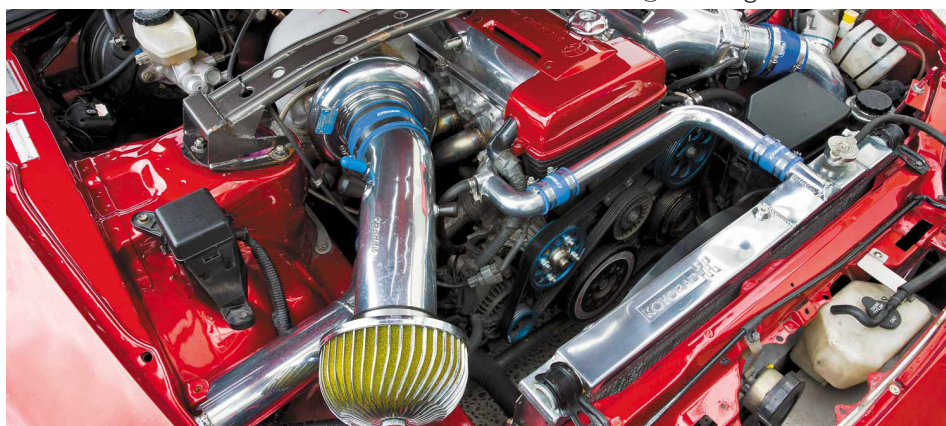
LVV certification is also required for the fitment of a turbo/s from an OE turbo-equipped vehicle to a non-turbo vehicle, or the complete replacement of an engine with a turbocharged OE option if it were not fitted from the factory into that particular vehicle. A common example of this is vehicles such as Nissan

Skylines and Silvias, which are available from the factory in turbo and non-turbo options, and the non-turbo vehicles are often later fitted with a turbocharged engine. Thankfully, in most situations such as this, the vehicle's chassis tag can be decoded to confirm the configuration the vehicle left the factory in.

SAFE AND LEGAL

The LVV certification process ensures that the engine conversion or modifications have been performed correctly, as well as the vehicle undergoing a cyclic brake fade resistance test to ensure that it remains safe with the increase in power. As part of the process, Landata is also updated with the vehicle's new engine capacity, ensuring the vehicle owner isn't questioned to its legality going forward.

For any engine conversion or performance increase enquiries, feel free to email tech@lvvta.org.nz



All conversions to an increased capacity engine, even those within the same family of engines or vehicles require LVV certification, as do modifications to a factory-fitted engine resulting in an increase of over 20 percent in power.

NUMBER PLATES

All vehicles operated on public roads in New Zealand are required to display registration plates.

The only way to obtain plates in New Zealand is through the NZ Transport Agency and its agents.

The Transport Agency (the only legal way to obtain plates) does not issue plates in an adhesive form. The governing legislation for number plates allows the front plate to be an adhesive sticker.

Motorcycles, mopeds, tractors, trailers and ATVs are required to display one plate only (at the rear of the vehicle) with a maximum of 5 characters (numbers and/or letters). All other vehicles are required to display front and rear plates with a maximum of 6 characters.

Plates aren't currently a reason for rejection in the VIRM (there are some requirements in the VIRM though). Plates are an enforcement issue, vehicle drivers can be issued fines for multiple plate offences, the most common of which is display.

All plates must be easily visible at all times and securely attached to the vehicle in an upright position.

Upright means the right way up so that the letters and numbers can be easily seen and read.

Mounting plates vertically is becoming increasingly common, especially on motorcycles. This isn't acceptable as the numbers and letters cannot be easily read. A friendly reminder to your customer might help them avoid a fine.

DID YOU KNOW?

Plate font: the font used on plates today has been around since March 2006 (for personalised plates February 2006).

Plates have a security feature: the directional security mark (silver fern) was added to registration plates in 1998.

Countrywide issue of plates: the first nationwide issue of plates began on 1 July 1925. Previously to this, plates were issued regionally through councils.

TAKATA ALPHA AIRBAG RECALL

Help your customer

If you're a WoF inspecting organisation, we previously sent you a poster and some flyers about the Takata Alpha airbag compulsory recall.

Please keep checking number plates on the 'compulsory Alpha recall' page on the Rightcar website, whenever you're carrying out WoF inspections or servicing vehicles – and provide a flyer to all owners whose vehicles come up with a match. They need to contact the manufacturer as soon as possible.

You can request more flyers by emailing vehicles@nzta.govt.nz



Recall not a WoF fail item

The requirements remain unchanged – vehicles should not be failed for a WoF because of the airbag recall. We'll be in touch with inspectors soon about affected vehicles being ban-flagged in future.

In the meantime, we appreciate the efforts to date of inspectors providing information about the recall – especially those who've gone the extra mile by going back through previous check sheets to ensure affected owners know about the recall and what to do.



For general enquiries or contact information about the Transport Agency please check our website www.nzta.govt.nz or email us at info@nzta.govt.nz

We welcome your feedback. Please send any comments to:

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