



# New Heavy Vehicle Entry Certification

Draft proposal for consultation

June 2023

Version 1

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# Consultation on the New Heavy Vehicle Entry proposal

The purpose of this document is to consult on the New Heavy Vehicle Entry proposal.

Consultation is being carried out to ensure the proposal is sound and robust and the development process takes account of the views of, and the impact on, people affected by the new process.

Feedback will help to finalise the proposal and ensure it is fit for purpose.

## Making a submission

If you wish to provide feedback on this proposal, please read it and consider the questions below, under 'Have your say'.

A survey link has been sent to you. Please complete the survey, which includes the following details:

- The title of the consultation (New Heavy Vehicle Entry proposal)
- Your name, and title if applicable
- Your organisation's name if applicable
- Your email address (preferred) or postal address.

The **deadline for submissions is 5pm on Friday 7 July 2023.**

## Your submission is public information

Please note your submission may become publicly available. We may publish any information you submit and may identify you as the submitter should it publish your submission or provide it to a third party.

**Please clearly indicate if your comments are commercially sensitive or, if for some other reason, they should not be disclosed, or the reason you should not be identified as the submitter.** Any request for non-disclosure will be considered in terms of the *Official Information Act 1982*.

## Have your say

The survey will ask for your feedback based on the processes and requirements outlined in this document:

- What benefits or impacts would the new requirements in this proposal have on your business/organisation?
- Do you support the processes and requirements outlined in this proposal?
- Do you see any risks in adopting or adhering to this proposal?
- Any other comments you would like to make on the draft proposal.

Please use the comment space under each question in the survey to provide the reasoning behind your response as this is beneficial in assessing feedback.

## Glossary

CoF B	Heavy Vehicle Certificate of Fitness (the outcome of a 6 monthly periodic safety inspection)
HVSC	Heavy Vehicle Specialist Certifier
IO	Inspecting Organisation
KSDP	Key Service Delivery Partner (an organisation appointed by Waka Kotahi to provide key regulatory products and services)
LANDATA	Waka Kotahi vehicle inspection database
LT400	The document being evidence of HVS Certification
MIAMI	Motor Industry Association model information (linked to LANDATA)
MVR	Motor Vehicle Register
NHVE	New Heavy Vehicle Entry certification category
OEM	Original Equipment Manufacturer
IO	Inspecting Organisation (an organisation appointed by the Waka Kotahi who is responsible for inspection and certification outcomes)
PI	Professional Indemnity (Insurance)
PL	Public Liability (Insurance)
QMS	Quality Management System
SoC	Statement of Compliance
VI	Vehicle Inspector (an individual appointed by Waka Kotahi to carry out inspection and certification activities - in this case NHVE)
VIN	Vehicle Identification Number (a unique number issued by the OEM or Waka Kotahi that, when decoded, identifies vital information about the vehicle)
VIN direct	A portal into the LANDATA system that allows authorised users to input vehicle data
WoV	Whole of Vehicle certification

# Introduction

## New certification process

A heavy vehicle entry certification review has been underway for several years. The review was initiated after several new vehicle imports showed engineering, design feature and manufacturing components that posed a safety risk.

The review identified an opportunity to create a certification process specifically for **new** heavy vehicles. This process improves the entry certification system and provides increased assurance in the standard of new heavy vehicles entering the country. The new heavy vehicle entry process introduces a vehicle inspector certification role for these types of vehicles, under appointment with Waka Kotahi.

This proposal was developed using feedback received from industry during the review, combined with technical advice and expert knowledge. It reflects processes and requirements used in the new light vehicle entry industry, adjusted for new heavy vehicles.

It forms the foundation for new heavy vehicle certification and explains the intended vision of the New Heavy Vehicle Entry vehicle inspector (VI) role. This includes how the VI fulfils tasks under the proposed New Heavy Vehicle Entry process, the size and scope of training requirements and responsibilities for the VI, the outcome of the certification process and the Statement of Compliance. It also includes the responsibilities of the inspecting organisation (IO).

It's important that the process outlined is robust, meets objectives and can be easily implemented by industry.

# Statement of Compliance validation and VIN decode process

A statement of compliance (SoC) is a statement from an authorised vehicle manufacturer's representative listing the standards that the vehicle complied with when it was made.

A SoC for a new, imported heavy vehicle presented by the original equipment manufacturer (OEM), their NZ representative or the importer, whether directly or a parallel import, must be verified.

This task is undertaken by a New Heavy Vehicle Entry (NHVE) VI and requires them to:

- collect information from the OEM
- verify compliance claimed, including:
  - compliance with the OEM
  - requesting and reviewing compliance documentation (E.g., Type approval documentation)
  - checking compliance data/documents or other evidence of compliance.
- present information on a SoC (in a format approved by us) and sign it.

## SoC validation process

The requirements for SoC validation remain the same whether the VI is directly employed by the IO (the OEM authorised importer) or operating as a contractor to the IO or importer.

- If the vehicle is not plated with a whole of vehicle (WoV) compliance plate, the NHVE VI must request a SoC and compliance data/Type approval documents from the OEM
- Confirm the SoC matches the vehicle (VIN, Make, Model, configuration, compliance etc)
- If a SoC is questionable, request standard compliance Type approval documentation (includes test certificates)
- If the Type approval documents (including test certificates) support the SoC, accept the SoC, then issue the LT4085N record of determination (if the SoC format meets our requirements) and enter SoC information into the MVR via MIAMI
- If the provided SoC proves compliance but does not meet our format requirements, the VI can, using the information supplied, prepare a SoC in the approved format and enter it into the MVR
- Where there is no SoC but Type approval documentation confirms compliance, the VI can, using information supplied by the OEM, prepare a SoC that meets our requirements to verify compliance and enter the information into the MVR
- If the information supplied cannot be verified, the VI must not supply a SoC or enter information into the MVR.

If an independent NHVE VI is validating SoCs for heavy vehicle parallel imports using this process, they must also be an approved NHVE IO if the importer is not.

Before a SoC can be entered into the system, the VIN must be verified to ensure the VIN decode data is in our MVR (LANDATA) system. Where the VIN is not recognised or a brand or model is new to New Zealand, the VI must obtain the VIN decode information from the OEM and email it to us at [frr@nzta.govt.nz](mailto:frr@nzta.govt.nz)

## Homologation Specialist Assessment Requirements (VI)

To be appointed by us, a New Heavy Vehicle Entry (NHVE) VI must meet ability and competence requirements. Unless there are exceptional circumstances, the following experience and/or qualifications will be required:

- A detailed understanding of the international standards (the standards that compliance claims to meet)
- A detailed understanding of how compliance is verified and presented in different jurisdictions
- A detailed understanding of the Type approval process, Test Certificates and how they are prepared, to enable the VI to be able to verify documents presented by the OEM, their agent, or the importer
- Knowledge and understanding of New Zealand Land Transport Rules and any New Zealand Standards that must be complied with.
- An understanding of the VIN decode process.

Formal Engineering qualifications and/or homologation experience may not be necessary if the NHVE VI applicant has sufficient relevant heavy vehicle experience like:

- Regulatory experience with standards compliance
- Industry experience with standards compliance
- Experience in process engineering.

The VI may not need direct heavy vehicle homologation experience but would need experience in compliance related fields like:

- Current product engineer/specialist or technical representative with a compliance background working for an OEM or their New Zealand representative
- Independent compliance specialist within New Zealand

The role may be suited to those with the technical knowledge required ie technical officers who are appointed through heavy vehicle entry inspection organisations.



# Homologation Specialist knowledge requirements (syllabus) (VI)

To be appointment by us, unless there are exceptional circumstances a New Heavy Vehicle Entry (NHVE) VI must meet ability and competence requirements:

- Rules: Have in-depth understanding of the compliance requirements in all Land Transport Rules for heavy vehicles:
  - heavy vehicles
  - heavy vehicle brakes
  - vehicle dimensions and mass
  - vehicle lighting
  - seats and seat anchorages
  - seatbelts and seatbelt anchorages
  - vehicle emissions
  - passenger service vehicles
  - door retention systems
  - external projections
  - glazing, windscreen wipe and wash, and mirrors
  - interior impact
  - steering systems
  - tyres and wheels
  - vehicle equipment
  - vehicle standards compliance.
- Standards: Understand the international standards referenced in the Rules (UN/ECE, ADR, Japanese Technical Standards, FMVSS)
- Compliance: Understand compliance (Type approval) and the process to achieve standards compliance
- Compliance reports: Able to interpret reports generated by the testing authorities and confirm the reports are valid for the vehicle type/model presented
- Certification: Understand the relationship between compliance and heavy vehicle specialist (HVS) certification and when HVS certification (LT400) must be carried out
- VIN: How to access and present VIN decode data.

Appropriate qualified external parties can offer training courses if they are assessed and approved by us.

It's expected that a training course would consist of:

- home study of a curriculum approved by us (Appendix 1)
- a one-day course including exam (morning = classwork to identify gaps, afternoon = exam).

It's up to the industry to ensure there are sufficient NHVE VIs to meet demand and the industry must take a leading role in providing opportunities for staff to acquire the required skills and experience. This could include offering cadetships or supporting staff to gain the required skills and knowledge.

Note that some people already filling compliance roles within industry may meet assessment criteria and be appointed without having to complete the knowledge course or exam.

There's an opportunity for current VIs with other categories to upskill and promote their services as independent or in-house NHVE VIs. These could include current HVSC or KSDP Technical Officers, or others with heavy entry & homologation knowledge.

# Homologation Specialist application process and appointment (VI)

The application process for a NHVE VI is like the VI application process for other certification categories and includes completing an application form (including payment of any fee if required) and providing any supporting documentation required. We'll also complete a fit and proper person check to ensure that those appointed meet our criteria.

Sign off/Appointment details include:

- Successful completion of training course/exam (minimum 80% correct required to pass)
- Recommendation by course provider
- Successful 'fit & proper' report
- Use of a quality management system that can be audited by us (Waka Kotahi NHVE QMS)
- Professional indemnity and public liability insurance that meets the requirements set by us, either covered by the IO or, if acting independently, their own cover.
- Assessment of any conflicts of interest (for example, other interests in the importation, sale, modification, or repair of heavy vehicles).

## NHVE knowledge requirements (IO)

All NHVE IO applicants must be able to show an understanding of or agree to the following:

- The process for HV Entry Certification
  - The process of interacting with MIAMI/LANDATA
  - The requirements and thresholds for HV Specialist Certification
  - Their statutory responsibilities as an appointed IO
  - Maintain a register of staff qualified to carry out various procedures.
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## NHVE application process and appointment (IO)

Unless there are exceptional circumstances, all NHVE IO applicants must meet the following requirements:

- Be the OEM, their appointed NZ representative or operating as a contractor to the OEM or importer.
- Meet our 'Fit & Proper' requirements
- Operate a QMS that is available for audit by us
- Have the systems and equipment to support a NHVE VI.

## NHVE assessment requirements (IO)

The application process for a NHVE IO is like the IO application process for other certification categories and includes completing an application form ((and paying any fee, if required) and providing any supporting documentation required. We'll also complete a fit and proper person check to ensure that those appointed meet our criteria.

Sign off/Appointment details include:

- Proving that they have the systems and equipment to support a NHVE VI
- Having an auditable QMS system (Waka Kotahi QMS)
- Having successful 'fit & proper' report for the organisation, the CEO, the VI, and any other persons who have, or are likely to have, control of all or part of the inspecting organisation
- Having professional indemnity and public liability insurance that is acceptable to Waka Kotahi
- Assessment of any conflicts of interest (for example, other interests in the importation, sale, modification, or repair of heavy vehicles).