

Correct as at 5th June 2026. It may be superseded at any time.

**Extract taken from:** Entry certification > Inspection and certification > Vehicle structure > Determining frontal impact compliance

## 3-2 Determining frontal impact compliance

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**IMPORTANT:** vehicles may be exempt from the requirement to meet a frontal impact standard.

See [Technical bulletin 7](#), [Technical Bulletin 8](#) and [Technical bulletin 9](#) for further information.

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The following information may help a vehicle inspector to apply the requirements for compliance with approved frontal impact standards.

### **Determine whether or not the vehicle must meet a frontal impact standard (FIS)**

Refer to Figure 3-2-1 (Step 1), Figure 3-2-2 (Step 2) and Figure 3-2-3 (Step 3) to determine whether or not the vehicle needs to meet an approved frontal impact standard.

If the vehicle is not required to comply with an approved standard, continue with the inspection.

Figure 3-2-1. Step 1

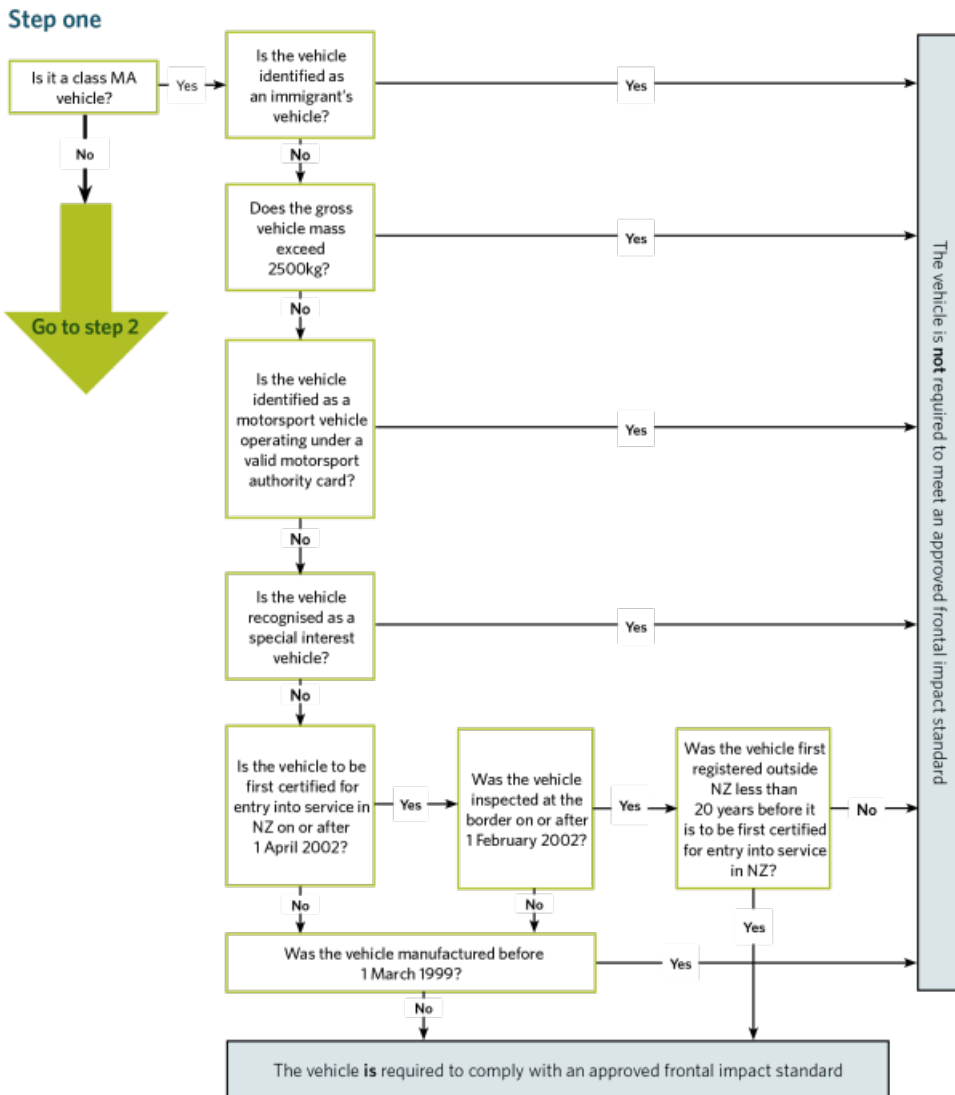


Figure 3-2-2. Step 2

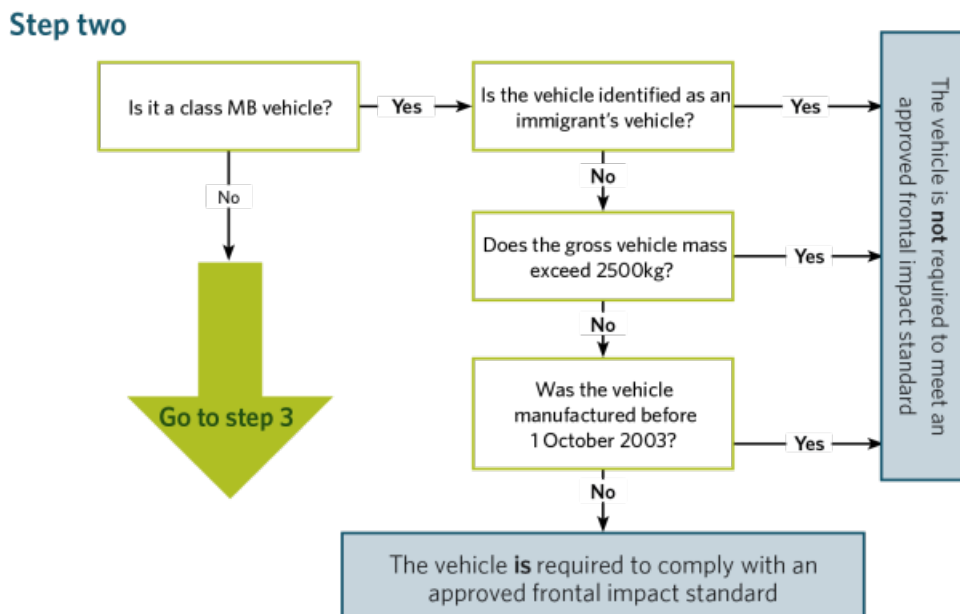
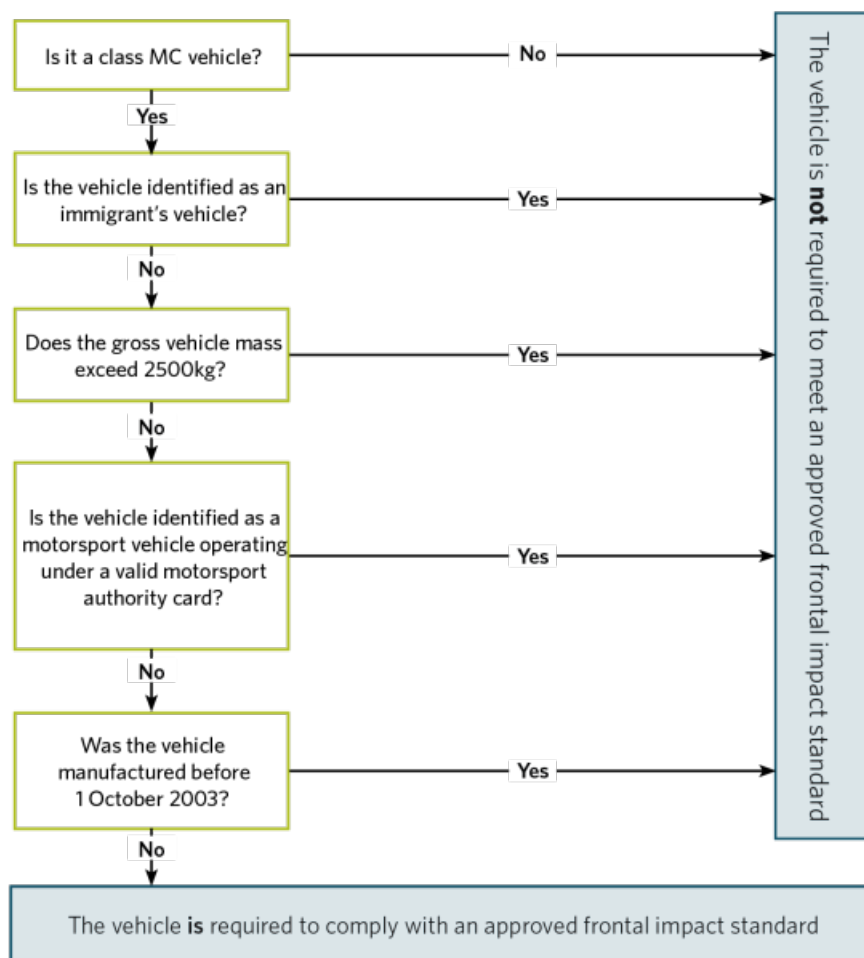


Figure 3-2-3. Step 3

Step three



If the vehicle is required to comply with an approved standard (listed in Table 3-2-1), there are several methods of determining whether or not the vehicle complies, which vary depending on the class of vehicle, the country of import and the date of manufacture.

Table 3-2-1. List of approved frontal impact standards\*

UN-ECE Regulation no.	EEC/EC Directive	FMVSS	ADR	Japan
94	96/79 99/98	208	69 73	TS for occupant protection in frontal collision. Article 18

\* A vehicle that is required to comply with an approved frontal impact standard must comply with at least one of the standards listed in the table.

### Check recognised manufacturer's lists

The Transport Agency has been advised by several common vehicle manufacturers regarding compliance with approved frontal impact standards for particular class MA vehicles. These vehicles are listed by make and model and published on the [NZTA website](#)

If a vehicle is shown on one of these lists as complying with an approved frontal impact standard, no further evidence is required to prove that the vehicle meets frontal impact standard requirements. However, a full statement of compliance is still required to prove compliance with other applicable standards, unless an alternative method of confirming standards compliance is provided.

If a vehicle is shown on one of these lists as not complying with an approved frontal impact standard, the vehicle cannot be certified unless a statement of compliance showing that the specific vehicle meets an approved frontal impact standard is provided.

## **Alternative methods for determining frontal impact compliance**

If a vehicle is not shown on any of the recognised manufacturer's lists, one of the following methods may be used to determine compliance with an approved frontal impact standard.

### **1 Vehicles imported from any country**

If a class MA, MB or MC vehicle imported from any country (including Japan) is not shown on one of the recognised manufacturer's lists, one of the following methods may be used to determine compliance with an approved frontal

impact standard:

Description	Methods for determining FIS compliance
A class MA, MB or MC vehicle	<ul style="list-style-type: none"> <li>• A statement of compliance issued by a representative of the vehicle manufacturer, confirming compliance with an approved frontal impact standard</li> </ul>
A class MA vehicle manufactured on or after 1 January 1996	<ul style="list-style-type: none"> <li>• An Australian Design Rules (ADR) plate affixed to the vehicle</li> </ul>
A class MB or MC vehicle manufactured on or after 1 January 1998	
A used class MA, MB or MC vehicle	<ul style="list-style-type: none"> <li>• An FMVSS certification plate, and</li> <li>• original documentation confirming that the vehicle was first registered in the US</li> </ul>
A new or unregistered class MA, MB or MC vehicle	<p>An FMVSS certification plate, and</p> <ul style="list-style-type: none"> <li>• documentation confirming that the vehicle was manufactured for the US market and would be permitted for use on public roads in the US</li> </ul>
A used class MA, MB or MC vehicle	<ul style="list-style-type: none"> <li>• An CMVSS certification plate, and</li> <li>• original documentation confirming that the vehicle was first registered in Canada</li> </ul>
A new or unregistered class MA, MB or MC vehicle	<p>A CMVSS certification plate, and</p> <ul style="list-style-type: none"> <li>• documentation confirming that the vehicle was manufactured for the Canadian market and would be permitted for use on public roads in Canada</li> </ul>
A class MA, MB or MC vehicle	<ul style="list-style-type: none"> <li>• A United Nations Economic Commission for Europe (UN/ECE) compliance plate, which must display the VIN and an approved frontal impact standard</li> </ul>
A class MA, MB or MC vehicle	<ul style="list-style-type: none"> <li>• An EC Whole Vehicle Approval plate, which must display compliance with the directive '2001/116' or later directive</li> </ul>

Description	Methods for determining FIS compliance
A class MA vehicle	<ul style="list-style-type: none"> <li>• An EC Whole Vehicle Approval plate and first registered in the United Kingdom in 10/2003 or later</li> </ul>

## 2 Vehicles imported from Japan

If a class MA, MB or MC vehicle that was manufactured in Japan is not shown on one of the recognised manufacturer's lists published on the Transport Agency website, one of the following methods may be used to determine frontal impact compliance.

Manufactured in Japan		
Class	Description	Methods for determining FIS compliance
MA	Car with an engine capacity of 660 cc or more	<ul style="list-style-type: none"> <li>• Evidence that the vehicle was manufactured for the domestic market on or after 1 January 1996 (Note 2)</li> </ul>
	Domestic model first registered in Japan after the end of the last year shown on the latest JAMA list (Note 1)	<ul style="list-style-type: none"> <li>• Evidence to establish a clear link to the continuation of a chassis number sequence known to be frontal impact compliant (Note 2)</li> </ul>
	Car with an engine capacity less than 660 cc (mini-sized vehicle)	<ul style="list-style-type: none"> <li>• Evidence that the vehicle was manufactured on or after 1 July 2000</li> </ul>
	New/unregistered car	<ul style="list-style-type: none"> <li>• A Japanese completion inspection certificate which demonstrates that the vehicle was manufactured in Japan on or after 1 January 1996 (Note 2)</li> </ul>
MB or MC	Manufactured for the Japanese domestic market	<ul style="list-style-type: none"> <li>• Evidence that it was manufactured in Japan on or after 1 July 1999</li> </ul>
	Domestic model first registered in Japan after the end of the last year shown in the latest JAMA list (Note 1)	<ul style="list-style-type: none"> <li>• Evidence to establish a clear link to the continuation of a chassis number sequence known to be frontal impact compliant</li> </ul>

**Note 1**

Japan Automobile Manufacturers Association's (JAMA) books may be used to establish the date of manufacture of Japanese domestic vehicles manufactured after 1 January 1996. When using this method, a vehicle inspector must be able to verify this information and demonstrate the verification process.

**Note 2**

If a class MA vehicle manufactured in Japan for the Japanese domestic market is not listed in any of the JAMA charts or chassis numbers covering production from 1993 onwards, and was first registered in Japan after the end of the last year shown on the latest JAMA list, it can be assumed that the vehicle was manufactured after 1 January 1996.

**Note 3**

Any MA, MB or MC class vehicle imported from Japan that satisfies documentation requirements for general compliance and meets Euro 4, Japan 05 etc level emissions standards or better may be accepted as frontal impact compliant.

If a class MA, MB or MC vehicle that was manufactured outside Japan is not shown on one of the recognised manufacturer's lists published on the NZTA website, one of the following methods may be used to determine frontal

impact compliance.

<b>Manufactured outside Japan</b>		
<b>Class</b>	<b>Description</b>	<b>Methods for determining compliance</b>
MA	Vehicle with an engine capacity less than 660cc (mini-sized vehicle)	<ul style="list-style-type: none"> <li>• Evidence that the vehicle was manufactured on or after 1 July 2000 (Note 4), and</li> <li>• Evidence that the vehicle has been through the Japanese type approval process (ie a TDN shown on the de-registration or export certificate)</li> </ul>
	Car with an engine capacity of 660cc or more manufactured for the Japanese market	<ul style="list-style-type: none"> <li>• Evidence that the vehicle was manufactured on or after 1 April 1999 (Note 4), and</li> <li>• Evidence that the vehicle has been through the Japanese type approval process (ie a TDN shown on the de-registration or export certificate)</li> </ul> <p style="text-align: center;">or</p> <ul style="list-style-type: none"> <li>• Evidence that the vehicle was manufactured after 1 July 1999 (this may be determined by decoding the VIN to confirm the vehicle has a model year of 2000 or later), and</li> <li>• Evidence that the vehicle has been through the Japanese type approval process (ie a TDN shown on the de-registration or export certificate), and</li> <li>• The frontal impact compliance lists provided on the NZTA website do not contain any contra information</li> </ul>
	Vehicle with no TDN shown on the de-registration or export certificate.	<ul style="list-style-type: none"> <li>• Alternative evidence of compliance with an applicable standard. This may be a statement of compliance, an EC Whole Vehicle Approval plate showing directive 2001/116, or a UN/ECE decal showing compliance with R94 , or</li> <li>• A TDN exemption .</li> </ul>
MB or MC	Manufactured for the Japanese domestic market.	<ul style="list-style-type: none"> <li>• Evidence that the vehicle was manufactured on or after 1 July 1999 (Note 4) (this may be determined by decoding the VIN to confirm the vehicle has a model year of 2000 or later), and</li> <li>• Evidence that the vehicle has been through the Japanese type approval process (ie a TDN shown on the de-registration or export certificate), and</li> <li>• The frontal impact compliance lists provided on the Transport Agency website do not contain any contra information.</li> </ul>

Manufactured outside Japan		
Class	Description	Methods for determining compliance
Vehicle with no TDN shown on the de-registrat or export certificat	<ul style="list-style-type: none"> <li>Alternative evidence of compliance with an applicable standard. This may be a statement of compliance, an EC Whole Vehicle Approval plate showing directive 2001/116, or a UN/ECE decal showing compliance with R94.</li> </ul>	

**Note 4**

Care must be taken when decoding the VIN. Not all manufacturers use the ISO standard exactly, so it cannot be taken for granted that manufacturers will always use the tenth character as year of manufacture, or that all manufacturers will use the same characters to denote the year. Table 3-2-3 shows decode data for some non-Japanese makes. Refer to the recognised manufacturers' lists on the the NZTA website for further information.

**Note 5**

For further information regarding frontal impact compliance requirements for specific Mitsubishi models, refer to Technical bulletin 8 – Frontal impact compliance for Mitsubishi models.

**Note 6**

For further information regarding frontal impact compliance requirements for Toyota Cavalier vehicles, refer to Technical bulletin 9 – Frontal impact compliance for Toyota Cavaliers.

**Note 7**

For further information regarding exemptions from frontal impact compliance requirements for people-mover vehicles, refer to Technical bulletin 7 - Frontal impact standard exemptions.

**Note 8**

A list of the class MA Japanese makes and models that are known to be manufactured outside Japan for the Japanese domestic market are shown in Table 3-2-2

**Table 3-2-2. Japanese vehicles manufactured outside Japan**

<p>Ford</p> <p><b>Note:</b> Some Ford models are built in Japan in partnership with Mazda</p>	<p>Festiva (Korea)</p> <p>Ka (Spain)</p> <p>Mondeo (Belgium)</p>	<p>Probe (US)</p> <p>Taurus (US)</p> <p>Escape (Taiwan)</p>
<p>Honda</p>	<p>Accord CD3, CD7, CD8, CE1, CF2 (US)</p> <p>Accord Inspire UA4, UA5</p>	<p>Civic Coupe EJ7 (US)</p> <p>LaGreat RL1 (US)</p>
<p>Mitsubishi</p>	<p>Carisma (Belgium and the Netherlands)</p> <p>Magna station wagon (Australia)</p>	<p>Diamante (Australia)</p>
<p>Nissan</p>	<p>Bluebird 'Aussie' (Australia)</p> <p>Primera E-FHP11 (Great Britain)</p>	<p>AD station wagon R-MV FY10 (Mexico)</p> <p>Mistral (Spain)</p>
<p>Toyota</p>	<p>Avalon (US)</p> <p>Cavalier (US)</p>	<p>Scepter (US)</p> <p>Voltz (US)</p>
<p>Subaru</p>	<p>Traviq (Germany)</p>	

**Table 3-2-3. VIN decode data for some European makes**

<b>Make</b>	<b>VINs starting with:</b>	<b>Make</b>	<b>VINs starting with:</b>
Audi	WAU, WUA or TRU	Hyundai	KMH
Cadillac	1G6	Jeep	1J4 or 1J8
Chrysler	1A8, 1C3, 1C4 or 1C8	Land Rover	SAL
Daewoo	KLA or KL1	Opel	W0L
Ford China	LFA	Porsche	WP0 or WP1
Ford Europe*	WF0	Saab	YS3
Ford USA	1FA or 1FM	Volkswagen	WVW or WVG

\* All of the above vehicle manufacturers use the tenth character as model year, except Ford Europe, which uses the eleventh character as year of manufacture.

Figure 3-2-4. Flowchart for determining frontal impact compliance for class MA vehicles

**Does this MA class vehicle meet an approved frontal impact standard?**

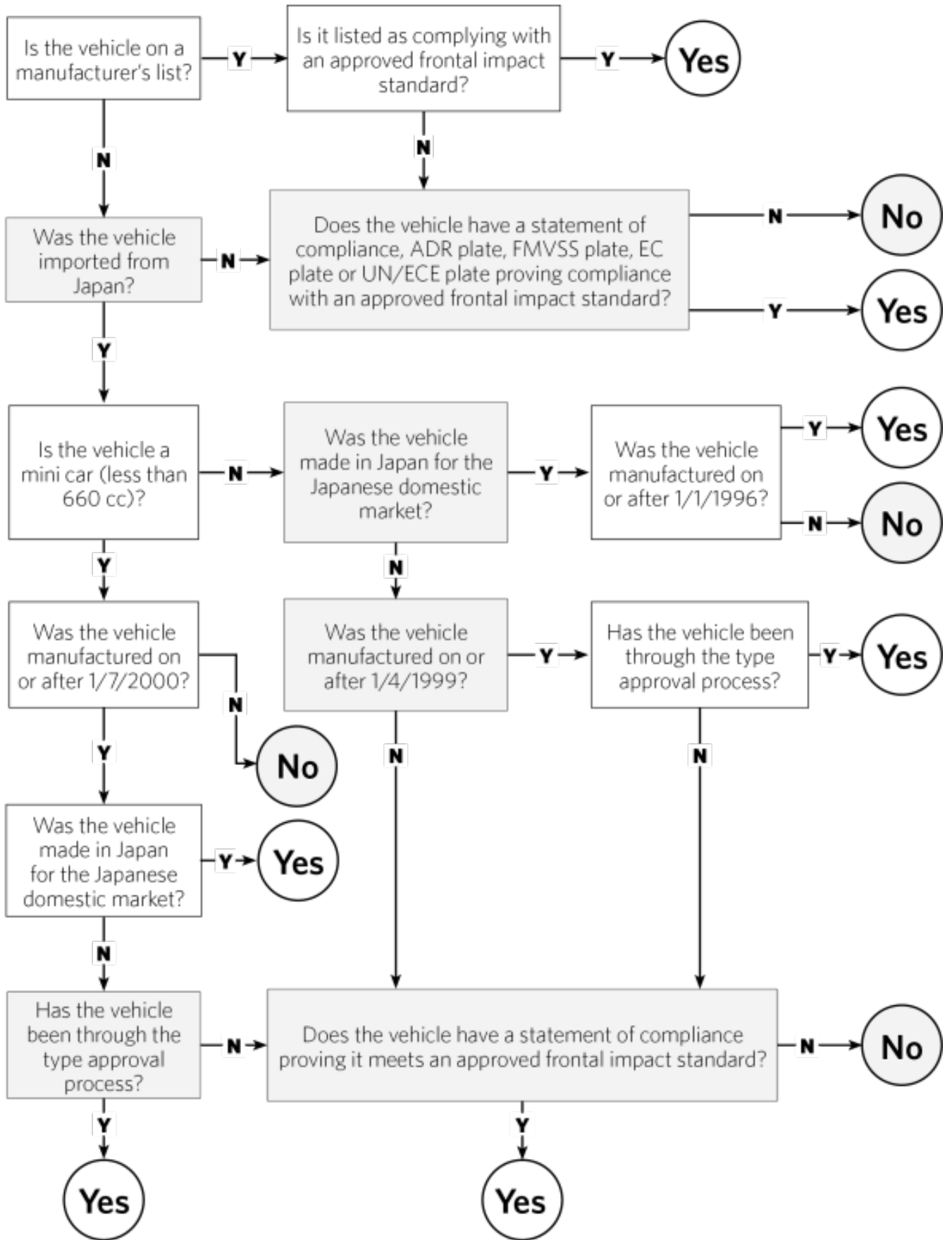


Figure 3-2-5. Flowchart for determining frontal impact compliance for class MB and MC vehicles

Does this MB or MC class vehicle meet an approved frontal impact standard?

