

Excluding approved imported modified vehicles from LVV certification – update on the new process

In September, the NZ Transport Agency issued a discussion document and invited public comment on a proposed change to the process for imported modified vehicles. The proposal would allow imported modified vehicles to be excluded from LVV certification in New Zealand if they've already met appropriate overseas standards.

Key feedback themes

The majority of feedback we received on the proposal can be grouped under key themes as follows:

- **Support for the proposed change:** The majority of submitters saw the proposed change as a positive move. In general, they saw it as being highly likely to reduce the time and cost involved with importing modified vehicles, and to increase access to disability vehicles that will improve mobility and quality of life for people with disabilities.
- **Identifying the specific modifications a vehicle has undergone:** There was a significant amount of feedback from submitters representing all parts of the industry on the importance of being able to list or identify the specific modifications that were made to a vehicle before it received approval overseas, and on being able to differentiate these from any modifications made after that approval was issued. Some submitters felt that the LVV plate (or an equivalent label) should be retained for imported modified vehicles.
- **Components and modifications covered by New Zealand's LVV standards versus those covered by overseas standards:** Many submitters pointed out that approval from overseas authorities is done against standards that are not exactly the same as New Zealand's LVV standards, and that some things our standards cover are not covered by overseas standards. Some submitters also suggested that New Zealand-based modifiers should be entitled to modify their vehicles to overseas standards as an alternative to LVV certification.
- **Ability to identify modifications at entry:** Some submitters felt that vehicle modification is such a specialised area that entry certifiers may not be able to identify all the modifications on a vehicle and match these to the overseas approval documentation.

Other feedback

We also received some feedback expressing dissatisfaction with the review process and consultation process, in particular the length of time provided for feedback and the scale of industry engagement, and the lack of a cost-benefit analysis of the proposed changes.

We acknowledge these points and we appreciate the effort made to provide feedback in the short timeframe provided, which has helped us shape the final outcome.

Our response to the feedback received

We have considered the feedback and made some changes to the proposed process as follows.

Identifying the specific modifications a vehicle has undergone

We noted in particular the widespread support for being able to identify the specific modifications a vehicle has undergone. As a result, we have added a step to the proposed process that requires entry certifiers to record the specific modifications in the inspection database (LANDATA) as part of the entry certification process. This information will be based on both the details in the overseas approval documentation and on a visual inspection by the entry certifier. Future users of this information who have access to LANDATA will be able to view the modification details in the IVCERT screen, and users who do not have access to LANDATA will be able to contact our contact centre to confirm this information.

We decided not to require an LVV plate or equivalent label to be issued to these vehicles, as the additional time required to issue and attach this would mean a less streamlined process than intended. We will monitor all vehicles that enter the country under the new process and will continue to refine the process in future, if needed.

Components and modifications covered by New Zealand's LVV standards versus those covered by overseas standards

Our decision-making process for accepting approvals from any given country includes consideration of how closely their standards meet those in New Zealand. Where there is no direct equivalence in requirements between the two countries, we must be satisfied that the overall process results in a safe vehicle before we will accept that country's approval. This brings the process for approved modified vehicles in line with that of production (non-modified) vehicles imported to New Zealand.

Ability to identify modifications at entry

It is the role of entry certifiers to make daily decisions about the condition of a vehicle and to validate that it matches the documentation provided. The changes being implemented are in line with the role that entry certifiers currently perform. In implementing this change, we have provided reference material for entry certifiers, such as samples of export documentation and approval plates/labels, to further assist them in identifying and validating overseas approvals.

Next steps

The new process, following feedback and resulting changes, will take effect from 1 November 2016, starting with modified vehicles imported with European Community Whole Vehicle Type Approval (ECWVTA). Due to complexities with the Japanese certification system, we have not yet been able to extend the new process to modified vehicles imported from Japan, but we are continuing to work towards a solution for this.

In early November we will send out a more comprehensive document that will provide detailed responses to issues raised in the consultation process. We will also issue an updated set of Questions and Answers providing an update on the review project overall.

The finalised process, described in the diagram below, achieves the objectives of making it easier and more cost effective for modified vehicles of a high standard to be imported into New Zealand, and increasing accessibility to special vehicles required by businesses and private citizens.

Diagram 1: Overview of the finalised process for excluding approved imported modified vehicles from LVV certification

