



# **ECWVTA Seminars – June 2008**

## **Day 3 - Trailer Manufacturers**

2. Technical requirements

### **Speaker:**

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# TECHNICAL REQUIREMENTS

Michael Hepworth

Senior Legislation Engineer



# TYPE APPROVAL

THERE ARE 58 SUBJECTS IN  
FRAMEWORK DIRECTIVE  
THAT MANUFACTURERS  
TO MEET

THE GOOD NEWS IS ONLY A  
MAXIMUM OF 21 OF THESE  
APPLY TO TRAILERS



# TYPE APPROVAL

FOR THOSE THAT ARE  
WITH THE EUROPEAN TRAILER  
CATEGORIES;

O Category are trailers of all types

O1 Trailers with a maximum mass  
exceeding 0.75 Tonnes

O2 Trailers mass exceeding 0.75 but  
exceeding 3.5 Tonnes

# TYPE APPROVAL

O3 Trailers maximum mass  
3.5 Tonnes but not exceeding 10  
Tonnes.

O4 Trailers maximum mass  
10 Tonnes

# TYPE APPROVAL

O1 & O2 trailer types have to comply with 19 subjects

O3 & O4 trailer have in addition to comply with 2 more requirements

The extra two for O3 & O4 are;

42. Lateral protection (Side Guards)

43. Spray Suppression

# TYPE APPROVAL

## Multi Stage Build

This is where a vehicle built in stages  
In the framework directive it mentions

### **COMPLETE**

This is where a vehicle is built in one  
stage

### **INCOMPLETE**

This is where a vehicle is built in several



# TYPE APPROVAL

## **COMPLETED**

This is where the vehicle has all stages and is finished

Only a COMPLETE or COMPLETED vehicle can be given a Certificate of Conformity and then be registered.

You can approve a vehicle at the first stage to full European approval and the same at subsequent stages



# TYPE APPROVAL

You cannot approve a stage to Vehicle Approval and then move to the next stage and have the vehicle approved to full European approval

# TYPE APPROVAL

I would suggest that of 21 subjects;  
15 would fall to the base vehicle  
to comply with (the chassis  
manufacturer)

8 would be component  
responsibility plus possibly a future  
you choose to use supplier  
components

# TYPE APPROVAL

*Typically* my list would look like this;

1. N/A to trailers
2. N/A to trailers
3. Fuel tank/Rear underrun  
**STAGE1/Component**
4. Rear reg plate space **STAGE 1**
5. Steering effort **STAGE 1**
6. N/A to trailers
7. N/A to trailers
8. N/A to trailers

# TYPE APPROVAL

9. Brakes **STAGE 1**

10. Suppression (Radio) **STAGE 1/**  
**Component**

11. N/A to trailers

12. N/A to trailers

13. N/A to trailers

14. N/A to trailers

15. N/A to trailers

16. N/A to trailers

# TYPE APPROVAL

17. N/A to trailers

18. Stat. Plates **STAGE 1, 2 and 3**

19. N/A to trailers

20. Inst of lights **STAGE 1**

21. to 24. lamp approvals done by  
component supplier

25. To 27. N/A to trailers

28. And 29. Lamps as 21. To 24. above

# TYPE APPROVAL

30. N/A to trailers

31. N/A to trailers

32. N/A to trailers

33. N/A to trailers

34. N/A to trailers

35. N/A to trailers

36. Heating systems **STAGE 1**

37. N/A to trailers

# TYPE APPROVAL

- 38. N/A to trailers
- 39. N/A to trailers
- 40. N/A to trailers
- 41. N/A to trailers
- 42. Lateral protection **STAGE 1/**  
**Component** (O3 & O4 only)
- 43. Spray Suppression **STAGE 1/**  
**Component** (O3 & O4 only)
- 44. N/A to trailers

# TYPE APPROVAL

- 45. Safety glass **STAGE 1(Maybe) & Component**
- 46. Tyres **STAGE 1 & Component**
- 47. N/A to trailers
- 48. Masses and Dimensions **STAGE 1(Maybe)**
- 49. N/A to trailers
- 50. Couplings **STAGE 1 & Component**
- 51. N/A to trailers

# TYPE APPROVAL

52. N/A to trailers

53. N/A to trailers

54. N/A to trailers

55. N/A to trailers

56. Dangerous goods **STAGE 1**

57. N/A to trailers

58. N/A to trailers



# TYPE APPROVAL

This list is an example only!

Responsibility for approvals will  
on how your product is built...

Remember no approvals can be  
without Conformity of Production

Talk to VCA !!!!

# TYPE APPROVAL

## WHAT DO I DO NEXT

### MY ADVICE WOULD BE;

1. Think of where you want to sell produce and how many you will produce (Types, Variants and Versions)
2. Choose your approval route  
Individual vehicle approval  
small series approval or Full European



# TYPE APPROVAL

3. If you choose Type Approval, come and talk to VCA;

- Introductory meeting
- Worst case meeting

4. Come armed with as much information as possible about your product.

*We treat your information as completely confidential*

# TYPE APPROVAL

At the 'worse case' meeting we can discuss;

## **1. What we need to test**

- minimum amount of testing to cover maximum product range

## **2. Where to test;**

You can choose where to test;

- On your own site, if you have facilities
- VCA have facilities for some tests.

# TYPE APPROVAL

## **2: Where to test, cont.**

- Recognised test facilities like Millbrook, MIRA, MI Technology, Status and some Universities to name but a few.
  - **ALPHABETICAL ORDER.**
- Overseas facilities (VCA will send out a test engineer to witness the test)
- Using a component supplier's facilities



# TYPE APPROVAL

- Before the test you will need to supply an 'Information document' so that the VCA engineer will know what you are covering with the test work you are carrying out.
- This is quite a detailed document to allow a thorough 'Specification Check' of the vehicle or component to be carried out

# TYPE APPROVAL

Next, the test...

Make sure you have the correct parts because what is tested will be what approved!

- you may not be able to change or include alternatives if they have not been previously considered

# TYPE APPROVAL

Discuss with the Type Approval engineer what documents are required for circulation.

These should be different to the 'information document' in so much they should include less detail than needed at the time of the test. Just enough to identify the vehicle/component.



# TYPE APPROVAL

**YOU HAVE GOT IT!**

**...NOW WHAT DO YOU DO WITH IT ?**

You now need to maintain your approval

- Make sure you cover changes to your product with changes to your approval documents – talk to VCA!

Depending on the nature of your planned change, VCA will respond in one of four ways;

# TYPE APPROVAL

1. Letter of no concern
2. Paperwork exercise
3. Partial test work
4. Full retest

This will be decided based on the extent of the changes you are making



# TYPE APPROVAL

In order to keep up to date with legislation, we recommend you subscribe to VCA's legislative information package, **VISTA**

Like other systems, this includes up-to-date copies of EU Directives and (United Nations) Regulations

*And VISTA contains other key information, particularly clarification of how VCA interpret these regs, which your design teams will find useful*



# ANY QUESTIONS?

I am here for the whole of the day so for specific technical questions please talk to me in the 'Surgery'

THANK-YOU FOR YOUR ATTENTION

# Overview of the 'Surgery' process





# Type Approval 'Surgeries'

- 1 to 1 opportunities to discuss your requirements with a VCA Type Approval expert
- Bookings during any break
- You've probably come a long way...
  - **MAKE THE MOST OF THIS OPPORTUNITY!**

		Topic			
		General	Technical	Control Plans	Quality Systems
12.40	Lunch				
13.30	Control Plans		Surgeries closed		
14.40	Quality Systems	Surgeries open for businesses with ISO/TS certification			
15.10	Free				