

IRISH VINTAGE
Scene



VVTA
Vintage & Veteran Trucks Association



Public Consultation



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As I mentioned earlier, on Friday 10th October the RSA published details of a public consultation requesting feedback from the general public on their views on what level of testing should be performed on historic vehicles. This public consultation runs until 14th November in which they have asked for feedback from any individual, club, organisation or any stakeholder with an interest or opinion on the testing of historic vehicles. The next couple of weeks will ultimately dictate the future direction of our hobby.

The 20 page consultation document is available online from the RSA website and there is also an option to download a response form to feedback on the 10 specific questions they have asked.

<http://www.rsa.ie/en/RSA/Your-Vehicle/Vehicle-Standards/Information-Notes-Consultations--EU-proposals-/Consultations-/Active-Consultations/>

It is important to bear in mind the following when responding to this consultation :-

- The RSA have two main interests :- 1) Road Safety and 2) Costs / Revenue
 - There is no point in giving out about other issues not connected to the specific questions in the consultation
 - Try to be courteous and polite and avoid use of abusive language etc.
 - Try to back up any of your points with facts – they carry much more weight than just opinions
 - It is important that each classic / vintage club & organisation complete a detailed response to this consultation
 - Individual club and non club members should also voice their opinions on this consultation and submit individual responses'.
 - Any individual or company who's full time job involves working with vintage vehicles should specify this and state how many people they employ where applicable.
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Note :-

It is important that Clubs & organisations who are responding to this consultation on behalf of their organisation include the following information with their submission :-

- Club Membership List
 - Details of donations made to charities or community groups in previous 5 – 10 years
 - Support provided for community events
 - Social support & networking for members who otherwise would have little or no other social interaction
 - Exemplary safety standards being adhered to and excellent safety record to date.
 - All clubs and individuals who submit a response form to the RSA should keep a copy of the completed form for their own records.
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Public Consultation

Vintage Vehicles

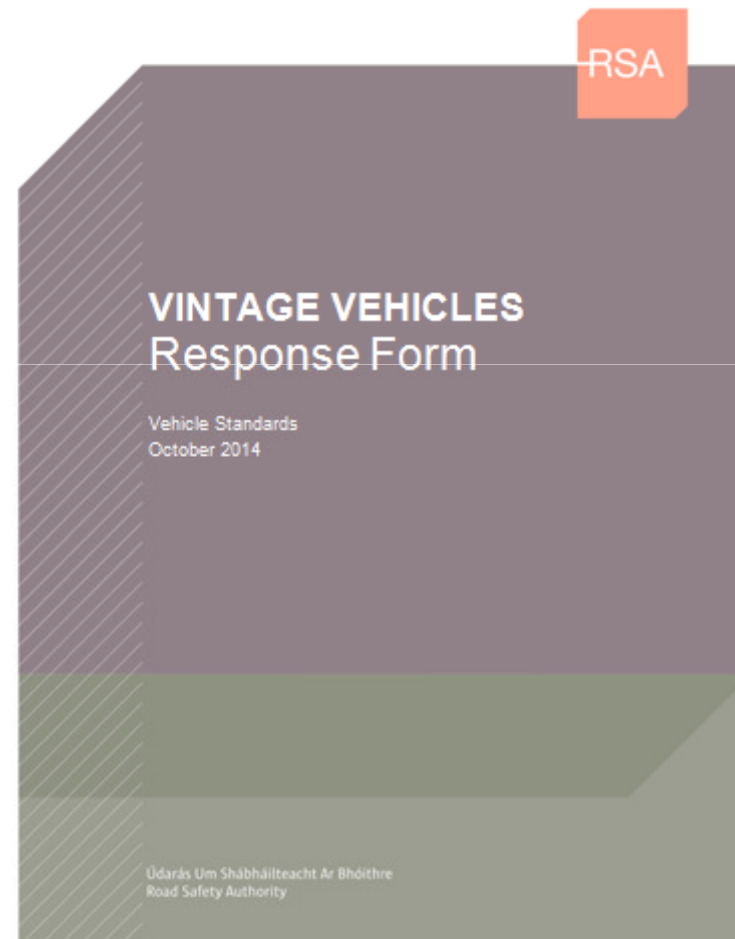
Response Form



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PART 1 - Information About You

Name	
Address	
Contact Details	
Company/Organisation Name	
Please tick one box from the list below that best describes you or your organisation.	
<input type="checkbox"/> Member of the public <input type="checkbox"/> Company <input type="checkbox"/> Representative Organisation <input type="checkbox"/> Public body <input type="checkbox"/> Interest Group <input type="checkbox"/> Other (please describe):	





PART 2 - Response Form

Questions on the RSA proposals regarding vintage vehicles

Q1. Do you agree that changes should be implemented to the roadworthiness testing requirements for vintage vehicles? If yes, please provide details; if not, please state why?

Please insert your response to Question 1 in the field provided below.

Yes we do believe that changes should be implemented to the roadworthiness testing for vintage vehicles, namely :-

1. Change to a Rolling 30 year exemption.
 2. The standard terminology used when describing vintage vehicles is any motor vehicles of 30 years of age or older.
 3. The 30 year exemption introduced in 2010 was very successful and the road safety feedback from the insurance companies who cover historic vehicles backs this up.
 4. This rolling 30 years also complies with the current description being employed for road tax purposes.
 5. As stated in the consultation document, on average these vintage vehicles cover a fraction of the mileage of modern vehicles and are typically used travelling to and from events, for display purposes in the support of various local community activities and charitable events.
 6. We would also be aligning our system to fit in to the latest publication EU directive planned for implementation in 2018.
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Q2. Do you agree that all vehicles used for commercial purposes (irrespective of age) should continue to be subjected to compulsory roadworthiness testing? If yes, please provide details; if not, please state why?

Please insert your response to Question 2 in the field provided below.

1. Yes we believe that vehicles used for commercial purposes should continue to require compulsory testing as they would be used more frequently than vintage vehicles and potentially cover substantially higher annual mileage.
2. Any vintage motor vehicle used solely for social and domestic purposes and for vintage events should receive the same exemptions as all other vintage vehicles.





Q3. Do you believe that a voluntary testing arrangement tailored for vintage vehicles not subject to compulsory testing would be of benefit, and, if so, up to what age vehicles should be accommodated by such an arrangement?

Please insert your response to Question 3 in the field provided below.

1. Yes we believe that a voluntary testing arrangement tailored to vintage vehicles not subject to compulsory testing would be beneficial.
2. This would however be very time consuming, expensive and difficult to implement due to the lack of available standards and the broad range of vehicles which would have to be catered for. Any decision in this area would need to include historic vehicle experts who could assist in the development of a age related test.





Q4. Do you believe that the standards to which pre 1980 vehicles are inspected should be revised? If yes, please provide details of any changes you think need to be made to the methods of inspection/reasons for failure (as appropriate) currently applied at both NCT/CVRT Test Centres?

In answering this question it may be useful to consult the [NCT](#), [LCV](#) and [HCV](#) Tester's Manuals. (Click on links highlighted in blue above to access these documents.)

Please insert your response to Question 4 in the field provided below.

1. If it is a case that pre 1980 vehicles are subjected to compulsory testing then there would definitely be a requirement to revise the standards to which these vehicles are tested to so that they are tested to the standards in place when the vehicles were first manufactured rather than the standards for modern vehicles.
 2. Any changes to test requirements in this area should involve consultation with the relevant experts in the associated clubs or organisations.
 3. If a compulsory test is implemented for pre 1980 vehicles it should be set at a frequency of 3 years and at a significantly reduced rate to that of the more comprehensive test which would be carried out on modern vehicles.
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Q5. If you agree that roadworthiness testing arrangements should be changed per Q1 above, which of the four options for exempting vehicles used for social and domestic purposes do you prefer – Option 1 (exempt pre-1960 vehicles), Option 2 (exempt pre-1980 vehicles), Option 3 (exempt vehicles over 40 years old) or Option 4 (exempt vehicles over 30 years old)? Please state why?

Please insert your response to Question 5 in the field provided below.

Our preference would be Option 4. (Exempt vehicles over 30 years old)

We believe that our excellent road safety track record to date for vintage vehicles backs up the rolling 30 year option. There are also several additional advantages to choosing this option :-

1. The 30 year rolling date ties in with the current motor tax legislation and would remove any ambiguity for individuals, regulatory authorities and enforcement agencies.
 2. It also provides a consistent set of regulations for all forms of motor vehicles.
 3. This option brings in some of the younger vintage vehicles and ensures that they are preserved for future generations. It also will feed into local economies and job creation with an increased number of newer vintage vehicles being restored which in turn would also provide additional support for charities and community organisations.
 4. We understand that in order to regulate this that there may be a requirement to limit the use of these younger vintage vehicles.
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Q6. If additional exemptions are introduced for vehicles used for social and domestic purposes based on age, do you think that vehicles which are not roadworthy might be used on public roads leading to increased incidences of road traffic accidents? If yes, please explain why?

Please insert your response to Question 6 in the field provided below.

No we do not believe that vehicles which are not roadworthy might be used on public roads leading to increased incidents of road traffic accidents for the following reasons :-

1. As we have already stated, the insurance providers have stated that these vehicles are a lower risk than their modern counterparts based on the current data available.
 2. Historic vehicles are not as fuel efficient or as comfortable as modern vehicles and require more frequent servicing, and expensive repairs often with difficult to source parts so it is really only true enthusiasts who will be prepared to shoulder the burden of these additional costs for their hobby.
 3. None of the vintage clubs or associations condone everyday use of historic vehicles.
 4. Owners of vintage vehicles maintain them to very high standards and take considerable pride in their vehicles which is not the case with several modern vehicle owners.
 5. We have an excellent track record based on the existing pre 1980 exemption which was introduced in 2010.
 6. The rolling 30 year exemption which was in place prior to the 1980 exemption also worked very well and we believe that this is the best option for all parties involved.
 7. It is the responsibility of the vehicle owner / driver to ensure that the vehicle is roadworthy and failure to do so also will void the vehicles insurance.
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Q7. If the review concludes that 1960 to 1980 vintage vehicles used for social and domestic purposes should be subjected to compulsory roadworthiness testing, do you think that vehicles which have been modified since first registration would have difficulty in passing a test? If yes, please provide details?

Please insert your response to Question 7 in the field provided below.

1. Yes we believe that in certain cases, some vehicles which have been modified since first registration may have difficulty in passing a test as they may not conform to the original standards or specifications which the vehicle was designed to, even though the modifications may have improved the safety of the vehicle.
 2. The diverse spectrum of vehicles across this twenty year period would present several instances where improvements and modifications may have been carried out to a vehicle, but the majority of the testers in the vehicle test centres would not be familiar enough with the history or reasons for the modifications or the various nuances of these vehicles to be in a position to recognise the resultant road safety benefits.
 3. Experts from each of the various clubs and associations would be happy to assist the RSA in helping to explain the various modifications made to historic vehicles, the reasons for these modifications most of which would be to improve their safety features of the vehicle.
 4. There may also be a requirement for the test operator to consult with the vehicle owner during the test to query and discuss some of the modifications carried out.
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Q8. Do you agree with the proposals put forward in Section 9 regarding effective enforcement to ensure that vehicles used for commercial purposes comply with the obligation to be tested? If yes, please indicate your preferred option; if not, please state why including details of any alternative measures that you think might be more appropriate?

Please insert your response to Question 8 in the field provided below.

1. Yes we would agree with the introduction of either one or both proposals put forward in the enforcement section of the proposal document.
2. We believe that the declaration of use is an important part of this.





Q9. Would the insurance premiums for vintage vehicles used for social and domestic purposes be likely to rise if they were exempt from compulsory roadworthiness testing? If yes, please explain why and provide relevant supporting info?

Please insert your response to Question 9 in the field provided below.

1. No there would be no increase in insurance premiums if vehicles are exempt from roadworthiness testing as this is currently the situation in place and our members enjoy favourable rates for their insurance premiums due to our exemplary safety record.
2. The insurance companies see vintage vehicles as a very low risk and are very happy to offer very favourable premiums based on this risk.
3. Insurance companies who provide policies for historic vehicles will not provide insurance to an individual unless they can provide details of an insurance policy for a vehicle for everyday use.
4. Several insurance companies require individuals seeking vintage insurance to be a member of a vintage club and maybe this should be made compulsory.





Q10. Do you have any comments, data, or analysis that would be beneficial to the RSA in evaluating the costs, benefits and other impacts likely to arise from the proposed Options? If yes, please provide details?

Please insert your response to Question 10 in the field provided below.

We estimate that if there is a requirement to test vintage vehicles, that there will be a detrimental impact on the vintage scene in the country. From speaking to various clubs, it is estimated that there will be a reduction in the range of 75 – 80 % in the amount of vintage vehicles in regular use. This will have a knock on effect on revenue for :-

1. Motor Tax being collected by local authorities.
2. Vintage Insurance premiums being sold and jobs associated with this business.
3. Revenue from the fuel used in vintage vehicles
4. Vehicles being serviced & restored & the numerous jobs associated with this.
5. We have completed a survey in the Limerick area and conservatively the vintage industry is supporting 35 – 40 full time jobs in the county. At a meeting in Connaught, it was estimated that there are approximately 70 full time jobs being supported by the industry in county Galway alone. This probably equates to several hundred nationwide.
6. There will also a huge impact to hotels, restaurants and guest houses due to the reduction in the number of events and the number of participants attending these events.
7. The cost of implementing testing for these vehicles will significantly surpass the revenue which will be received from testing of these vehicles. The resultant payback / return on investment will possibly be in the order of decades rather than just several years.
8. A rolling 30 year exemption will bring more vehicles in to the vintage scene and will increase the amount of vehicles being restored and result in additional job creation in the area of car restoration.

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(continued)

9. As current custodians of vintage vehicles, it is imperative that we attract new young members into our clubs and organisations to sustain the continued preservation and use of vintage vehicles for future generations. Vintage cars for these younger members are typically the cars their parents drove when they were growing up and this further supports our recommendation for a rolling 30 year exemption.
10. The requirement for compulsory testing will also have a detrimental impact on charities and local clubs and associations. We have figures from clubs and associations in the Munster area which show donations of over 2,000,000 over the past 8 – 10 years.
11. For several vintage vehicle owners – especially in rural Ireland, vintage events are the owners only social outlet and loss of this would lead to increased isolation and even in some cases severe depression for members.
12. Vintage Vehicle owners have a genuine passion for their vehicles and the vast majority of owners would have an excellent mechanical knowledge and awareness of how their vehicle is performing and would anticipate problems and rectify them before they have any impact on the safety or performance of the vehicle.
13. It should also be noted in a similar public consultation being run in the UK at the moment, the authorities are looking to remove the requirement for MOT testing of vehicles over 30 years old. This would not even be considered unless the instances of road safety issues associated with mechanical failure on these vehicles was negligible.



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Discussion / Questions

