



## LVV Certification Requirements for Under-threshold Items

### Introduction

LVV certification is not required for all modifications: - there are a number of modifications that are deemed 'under-threshold' and these are listed in each LVV standard and collated in LVV information sheet 'LVV Certification Threshold Schedule'.

Currently, when a vehicle is presented to an LVV Certifier for certification, all under threshold items are included in the certification, as the vehicle is required to be certified in its entirety. Some under-threshold items, such as aftermarket wheels, are then engraved on to the LVV plate. If an under-threshold item is removed or further modified afterward, the vehicle is required to be re-inspected by an LVV Certifier so that the LVV plate can be updated.

This system potentially creates an inequity, where a vehicle with only under-threshold modifications can be modified freely, but once a vehicle has been LVV certified an under-threshold change may introduce further compliance costs.

### Discussion

One solution is to remove all under-threshold items from future LVV certifications, and allow those previously certified items to be removed or further modified without the requirement for an inspection by an LVV Certifier. However, applying this allowance to all under-threshold modifications raises a number of safety concerns.

As an example, a vehicle fitted with height-adjustable suspension, dropped spindles, and larger brake discs and calipers requires LVV certification. If the vehicle also has under-threshold aftermarket wheels, under the proposal considered above, these would not be inspected. A concern is that the current certification process often identifies, as an example, insufficient wheel nut engagement, increasing the likelihood of a wheel detaching from the vehicle during operation. Additionally, post-certification modifications can introduce significant safety risks if not inspected; - for example, aftermarket wheels changed for smaller diameter wheels may affect brake caliper clearance and suspension scrub-line, all of which may not be identified without an inspection by a LVV Certifier.

### Solution

It is clear that not all under-threshold items can be treated in the same way without introducing risks to safety, so the items which present acceptable risk need to be split from the rest, which will be given further consideration. The threshold schedule already separates under-threshold items into two groups:

- 1) **'modifications that never require LVV certification'**; and
- 2) **'modifications that require LVV certification if they exceed a certain level'**

These two groups are going to be dealt with separately. Phase one (modifications that never require LVV certification) will be dealt with immediately, while phase two (modifications that require LVV certification if they exceed a certain level) will be dealt with at a later date. To enable the two groups to be clearly distinguished from each other, to follow is an example of each group:

Phase one: 'Modifications that never require LVV certification':

These modifications are only subject to 'In-service requirements for condition and performance', as in this example taken from the threshold schedule:

Fitting of or modification to:	LVV Certification is <b>never required</b> : (never refer to LVV Certifier)
Modified accelerator pedal	<ul style="list-style-type: none"> <li>▪ In-service requirements for condition and performance must be met.</li> </ul>

Phase two: 'Modifications that require LVV certification if they exceed a certain level':

These modifications have requirements listed in the right-hand column of the schedule as follows:

Fitting of or modification to:	LVV Certification is <b>not required provided that</b> : (refer to LVV Certifier if beyond threshold below)
Auxiliary winches	<ul style="list-style-type: none"> <li>▪ The winch either:                             <ul style="list-style-type: none"> <li>▫ does not protrude forward of the front face of the bumper; or</li> <li>▫ does project forward of the bumper line, but is fitted with 'pedestrian-friendly' shrouds to reduce trapping risk &amp; present a larger forward facing surface area.</li> </ul> </li> </ul>

The way in which this situation will be dealt with is as follows:

When a LVV Certifier is presented with a vehicle for certification, modifications that never require certification are covered by the Remaining Safety Items Form (F003) filled out by the LVV Certifier at the point of certification, or by a WoF check sheet provided to the LVV Certifier. This confirms that the in-service requirements have been met, and negates the need for the LVV Certifier to complete any additional form-sets.

The LVV Certifier is also no longer required to list modifications that never require certification on the LVV Statement of Compliance Certificate (F001), or the LVV Data Sheet (F002). These modifications will not be listed on the LVV plate, and therefore, any further modifications to these items will not require further inspection by an LVV Certifier.

At this point, there is no change to how modifications that require LVV certification if they exceed a certain level are treated. These modifications may be re-classified in the future once careful consideration has been given to this next step, so that we prevent the introduction of unintended safety risks.

**List of modifications that never require LVV certification**

The following is a list of modifications that never require LVV Certification as taken from the LVV Certification Threshold Schedule:

Vehicle Exterior
▪ Aerials
▪ Engine hood emblems
▪ Engine hood pins
▪ Tow-bars
▪ Trunk racks
▪ Roof racks
▪ Additional or substituted rear-view mirrors
▪ Aftermarket sunroof or roof vent/hatch
▪ Ute trays

<b>Lamps &amp; Signalling</b>
▪ Lamps (that are substituted for OE or additional)
▪ Lamp protectors (both clip-on and adhesive-fixed)
<b>Vision</b>
▪ Overlays (inc. anti-glare band, clear or transparent stone-guard)
▪ Stickers
▪ Radio antennae
▪ Monsoon shields
▪ Electric demisters
▪ Aftermarket sunroof or roof vent/hatch
▪ Removal of a windscreen wash system from a vehicle manufactured before 1/1/1992
▪ Additional or substituted rear-view mirrors, or removal of a non-mandatory mirror
<b>Vehicle Interior</b>
▪ Seat pads or covers
▪ Retrofitted type-tested rear seatbelt anchorages
▪ Rear seatbelts fitted to class MD1, MD2 and NA vehicles before 1 March 1999
▪ Removal of non-mandatory seatbelts (including full or partial removal of seatbelt in positions where seats have been removed)
▪ Replaces a type R1 or R2 seatbelt with a webclamp R1 or R2 seatbelt (eg where VIRM Technical Bulletin 5 applies)
▪ Modified accelerator pedal
▪ Roof and door lining replacement
▪ Cargo barriers
<b>Brakes</b>
▪ Aftermarket brake pads, linings and hoses (including stainless steel braided brake hoses)
<b>Steering</b>
▪ Urethane suspension bushes
<b>Tyres, Wheels &amp; Hubs</b>
▪ Modified mudguards, including flared wheel arches or the addition of mudguard extensions
<b>Exhaust</b>
▪ Exhaust system or silencer
<b>Towing Connections</b>
▪ Towing connections
<b>Miscellaneous Items</b>
▪ The installation or modifications of an LPG or CNG fuel system

**Finally:**

For any assistance in the use of this Information Sheet please contact an LVVTA team member at the Wellington LVVTA office.

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**Low Volume Vehicle Technical Association**