

Vehicles with retrofitted seating layouts

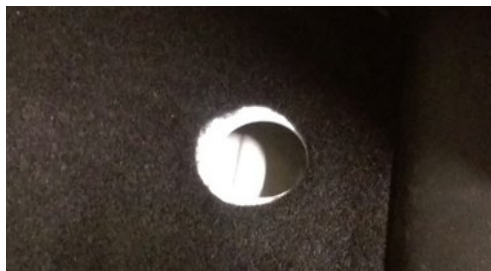
Sometimes, a vehicle will be presented to a taxi licensing authority, with a seating layout that has been modified since manufacture. Usually, this will be an ex-Motability vehicle, purchased at auction, but not attractive to the taxi buyer, as it is fitted with a small number of seats and a large wheelchair space. Sometimes, aftermarket seats will have been fitted. Sometimes, second hand seats from a scrap car will have been fitted – or seats bought from online auction sites. In many cases, these may look very similar to the seats fitted to those in our vehicles sold into the taxi market. However, if the vehicle was not originally manufactured to accept those seats, even though the seats appear to latch into the floor when deployed, they may not be strong enough to withstand crash loading, resulting in them pulling out of the vehicle floor.



In the example on the left, the catches at the bottom of the seat legs (A) are intended to latch into the holes in the floor (B). However, this vehicle was manufactured to accept a different seat mounting arrangement, and the holes in the floor have been added retrospectively. There is no guarantee that the seat would not pull out of the floor in a crash.

In some seating configurations fitted to the base vehicle, three single seats may be fitted instead of a split “60/40” seat in Row 2 of the vehicle. For those vehicles, the base vehicle manufacturer will fit additional reinforcements in the floor, for the seat to latch into, but these will be missing from those vehicles intended to be fitted with a split 60/40 Row 2 seat, as they are not necessary. Mixing

seats between both types of vehicle, can lead to seats appearing to engage correctly, but engaging into material of insufficient strength to withstand crash loadings.



Mounting hole intended for 60/40 seat.



Mounting hole intended for three single sea

Certificates of Conformity – what to look for

Often, these retrospectively modified vehicles will come with certificates described as “Certificates of Conformity”, but which are not “Certificates of Conformity in the type approval sense of the term.

What is the purpose of a CoC?

Type approving a car, means carrying out a large number of expensive tests, and destroying several cars. Clearly, the manufacturer can't do this with every car, so the whole point of a “type” approval, is that the destructive tests are carried out on one example of a “type” of vehicle, and then all subsequent vehicles of that “type” are built to the same specification as the one that passed the test. This is why there's no such thing as a CoC for an individually approved vehicle – because with those, there are no destructive tests so a certificate is issued by a government body, (DVSA) for each individual vehicle tested. For all “type” approved vehicles, however (whether it's a full European, a GB National, or a Small Series type approval, a CoC is issued **by the vehicle manufacturer**. It is the manufacturer's written guarantee, that the vehicle whose VIN appears on that certificate, is the same as the one that passed the tests. They ALWAYS start with the same wording:

“The undersigned, [insert name and position of senior person within the company who manufactured the vehicle] hereby certifies that the vehicle...”.

The certificate then goes on to give a good deal of technical data about that vehicle, and then, further down, it says”

“...conforms in all respects to the type described in approval [insert type approval number] granted on [insert the date that the approval was granted]”.

So it is evident that it's the written guarantee, from a senior person working for the manufacturer, that the vehicle whose VIN appears on that certificate, conforms to a particular type approval. Any certificate, claiming to be a CoC, but not issued by the holder of the type approval whose number it bears, **will not be a type approval CoC**.

When is a CoC issued?

The CoC can only be issued once a vehicle is complete and compliant with its type approval, but before it is registered. This is simply because once a vehicle is registered, it could be modified, and the manufacturer would have no control of its specification thereafter. **It therefore follows that any certificate, claiming to be a CoC, but with an issue date after the car's registration date, will not be a type approval CoC.**

What does a CoC cover?

The CoC is the manufacturer's written guarantee that the vehicle complies with the requirements for its particular level of type approval. There will be many of these – noise, emissions, crashworthiness, seat belt anchorages, brakes, lights, tyres, weights, etc. For a full GB approval, there are about 80 requirements. **Any certificate, claiming to be a CoC, but referring to only one of those type approval subjects, (such as seat belt anchorages), will not be a type approval CoC.**

How to recognise a genuine CoC?

The numbering system for each of the items on a CoC, much of the text on the certificate, and some of the logos and markings, are specified in regulations. For a mass-produced car, they will look slightly different to the ones for a “multi-stage” car, like those built by Cab Direct. The mass produced (or “single stage”) certificate, will contain all the information on one sheet of A4 (which can be double-sided). If issued after about the end of 2020, it will be on watermarked paper, with the manufacturer's logo, and it will contain some sort of additional device to prevent copying. Earlier CoCs did not need the watermark, though some manufacturers implemented it, before the regulatory deadline. Try photocopying a few genuine ones, if in doubt. For a multi-stage vehicle (which most converted taxis will be), the certificate from the taxi manufacturer will only contain the text fields that are different to those for the base vehicle.

In any case of doubt, it is always possible to contact us with a copy of any CoC that you might wish to query. We will be able to confirm the specification of the vehicle as it left the factory. In some cases, photographs of the vehicle in its current condition, might be useful in identifying whether the seating arrangement is original.

Contact us on: homologation@alliedvehicles.co.uk

It should also be possible to contact the Vehicle Certification agency, who should at least, be able to confirm whether the certificate is in the correct format and whether the type approval number on the certificate, was a number issued to the manufacturer concerned.

Contact VCA on andrew.meadows@vca.gov.uk

Certificate Of Conformity

Cert No: 6699



Two forward facing seats

Date: 15/12/2023

Vehicle YY68DCE - WV2ZZZ2KJX130782

Report

Inspection of YY68DCE - WV2ZZZ2KJX130782

I can confirm rails and fixings have been used when installed in above vehicle which meet the requirements of 76/115/EEC as amended by 96/38/

M1 EG

category

The kit in this vehicle have been fitted with approved over and under floor strengthening kits if you have any queries about the above information please contact the office.

hello@hamiltonjarvis.com


Hamilton Jarvis Prestige

This “Certificate of Conformity” is not a type approval Certificate of Conformity. It has no type approval number or the date on which that type approval number was issued. It is missing almost all of the data that would normally be expected on a Certificate of Conformity, (such as data relating to vehicle weights, variant and version codes, or a manufacturer’s address). There is no manufacturer’s declaration of the type approval regulation with which the vehicle is claimed to comply. Instead, there is reference to one particular EC directive for just one of the many individual subjects (seat belt anchorages), required for type approval. In addition, it makes vague claims that the vehicle has been fitted with “approved” over and under floor strengthening kits, but does not mention by whom, these kits were “approved”.

Although the regulations governing the layout and data on a type approval Certificate of Conformity have changed several times, over the years, “type approval” certificates of conformity, will all follow much the same pattern – the named individual at the manufacturer, the numbered data fields, the address of the manufacturer (and that of the base vehicle manufacturer, in the case of a multi-stage built vehicle). Also, the number of the European or GB regulation to which the vehicle is approved.

EC CERTIFICATE OF CONFORMITY FOR COMPLETED VEHICLES

The undersigned: *GERRY FACENNA* hereby certifies that the vehicle:

0.1.	Make (Trade Name of the Manufacturer)	Allied Vehicles Ltd
0.2.	Type	7
	Variant	JBHY
	Version	63S-5
0.2.1.	Commercial name(s)	Horizon RS
0.2.2.	For multi-stage approved vehicles, type-approval information of the base/ previous stages vehicle (list the information for each stage)	
	Type	7
	Variant	JBHY
	Version	63S
	Type-approval number, extension number	e2*2001/116*0365*30
0.4.	Vehicle Category	M1 – Special Purpose (WAV)
0.5.	Name & address of the manufacturer of the completed vehicle	Allied Vehicles Ltd., 230 Balmore Road, G22 6LJ, Glasgow
0.5.1.	For multi-stage approved vehicles, company name and address of the manufacturer of the base/previous stage(s) vehicle	Automobiles Peugeot 75 Avenue de la Grande Armee 75116 PARIS (France)
0.6.	Location and method of attachment of the statutory plates	Stage 1 RH B Pillar, adhesive label Stage 2 RH B Pillar, adhesive label Lower windscreen cross-member
	Location of the vehicle identification number	
0.9.	Name and address of manufacturer's representative (if any)	N/A
0.10.	Vehicle identification number	VF37JBHY6HJ571127
	(a) has been completed and altered as follows:	Wheelchair access conversion comprising lowered floor & revised seating layout <u>and</u> .
	(b) conforms in all respects to the type described in approval e11*2007/46*3133*06 issued on 28/04/2017	
	(c) can be permanently registered in Member States having left-hand traffic and using metric and imperial units for the speedometer	
Date:	19/09/2017  (Signature)	(Position) Chairman (Place) Glasgow, United Kingdom
Attachments:	Certificate of conformity delivered at each previous stage.	

13.	Mass of the vehicle with bodywork in running order	1700 kg						
13.2.	Actual mass of vehicle	1704 kg						
16.	Technically permissible maximum masses							
16.4.	Maximum mass of combination	Not suitable for towing						
18.	Technically permissible maximum towable mass	0 kg						
18.1.	Drawbar trailer	/ kg						
18.3.	Centre-axle trailer	N/A kg						
18.4.	Unbraked trailer	0 kg						
19.	Maximum vertical load at the coupling point for a trailer	0 kg						
36.	Trailer brake connections	N/A						
38.	Code for bodywork	SH						
40.	Colour of vehicle	Blue						
42.	Number of seating positions (including the driver)							
		<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 50%;">Number of <u>conventionally seated</u> passengers (including driver)</td> <td style="width: 50%;">Number of 160kg occupied wheelchairs</td> </tr> <tr> <td>5</td> <td>0</td> </tr> <tr> <td>3</td> <td>1</td> </tr> </table>	Number of <u>conventionally seated</u> passengers (including driver)	Number of 160kg occupied wheelchairs	5	0	3	1
Number of <u>conventionally seated</u> passengers (including driver)	Number of 160kg occupied wheelchairs							
5	0							
3	1							
42.3.	Number of wheelchair user accessible positions	1						
46.	Sound level							
	Stationary	78.0 dB(A) at engine speed: 2813 min ¹						
	Drive-by	74.0 dB(A)						
51.	For special purpose vehicles designation in accordance with Annex II Section 5	Wheelchair Accessible Vehicle						
5.2.	Remarks							