



The Road Haulage Association

Baroness Vere of Norbiton
Parliamentary Under-Secretary of State
Department for Transport
Great Minster House
Horseferry Road
London
SW1P 4DR

5th May 2020

Dear Baroness Vere

Thank you for your time last Friday to catch up on outstanding issues and to discuss briefly our financial ask which I hope you are making some headway on?

As promised during our meeting, I said I would write to you with regards to our concern about roadworthiness testing and DVSA's approach.

Last Thursday, the RHA participated in a conference call about the resumption of testing with DVSA and other trade bodies. At the beginning of this crisis we were always concerned about relaxing testing and unhappy with the approach that DVSA took, particularly when our industry is having to maintain vehicles to keep food and medicines moving.

We have always believed that it is possible and practical to deliver testing in a different way even before the COVID-19 crisis and believe now is the time for decisive action to reintroduce testing for heavy goods vehicles in June or July through delegated testing.

DVSA were unable during the call to provide any clarity on a restart date or provide any commitment in establishing one, only alluding to the fact that it may take a few weeks from any decision to restart.

There is a growing sense from the industry that DVSA have failed to consider and deal with the suspension of roadworthiness testing in a reasonable way. Their behaviour in dealing with this issue and lack of consideration for the needs of Authorised Test Facilities (ATF's) and hauliers throughout this crisis is simply unacceptable.

Their approach is not unexpected given the long history of how DVSA have managed roadworthiness testing. I have attached to this letter a summary of our experience both recently and over the past 3 years'. As things stand, I have little or no confidence in their commitment to restart or their willingness to seriously consider alternative controls to restore testing in a timely way.

As you know, testing lorries is an essential part of managing road safety and the businesses that we represent are pushing hard to gain clarity for when the suspension will be lifted for their operational planning. ATF businesses have also been closed by DVSA's actions with no right of appeal and no suggested alternatives. There is a significant risk that many of these businesses may fail and will not be available on restart.

When testing recommences from a standing start we also have concerns that the limited number of DVSA examiners will act as a constraint creating an immediate backlog. Assuming a significant number of haulage businesses do not survive we still believe there will be a demand for lorry and

trailer testing lasting for approximately 6 months and so the sooner we can restart the better. For those businesses that do survive the availability of roadworthy lorries and trailers to meet market demand will be critical for recovery.

As I alluded to at the beginning of this letter, trade associations have been proposing alternatives to address DVSA's inability to manage the testing system without success for years. I would now ask the department to act with urgency and decisiveness with regards to this matter.

Our longstanding proposal for delegated testing is not new and having made several requests to DVSA to authorise qualified people to test lorries and trailers at ATF's, in addition to DVSA's own employees, we are still at an impasse.

Our view is that DVSA would retain the role of scheme auditor and supervising body under international roadworthiness regulations. The ATF's would directly commission qualified and authorised inspectors to undertake roadworthiness tests (these could be DVSA inspectors when they return to work, qualified and authorised employees of the ATF or qualified and authorised independent inspectors).

Clearly our preference would be for this to be a permanent measure, however, in the interim whilst this could be reviewed, it certainly provides a short-term solution to get testing up and running quickly.

The RHA will be very happy to assist officials in any way we can, to bring this measure forward.

I look forward to hearing from you very soon.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Burnett', with a long horizontal flourish extending to the right.

Richard Burnett
Chief Executive