

Virtual Member Briefing – Compliance Calendar

Questions and answers

Q: With regards to brake testing, can we continue to use a Tapley meter for brake testing?

A: Yes. It is acceptable to use an approved and calibrated Tapley meter, also known as a decelerometer, to measure overall brake efficiency values for rigid vehicles without trailers or for vehicles that cannot be tested on an RBT. A decelerometer will measure the overall brake efficiency but it may not identify individual braking issues. A temperature check needs to be carried out before and after the decelerometer test to help identify if individual brakes are operational.

Q: What are the changes to e-learning with the new national DCPC?

A: E-learning is essentially online driver CPC training that is undertaken without the supervision or direction of a tutor. Under the new national CPC scheme, drivers can now take e-learning only courses, whereas the International Driver CPC has a two-hour limit on e-learning for trainer-led courses. For example, drivers could take an approved 3 hours 30 minutes long e-learning course at their workplace or home, up to a total of 12 hours towards their overall 35 hours of training.

Q: Will you be charged multiple times if you enter and exit the DVS zone without a permit?

A: Yes. Our understanding is that an operator could receive multiple fines per day if they enter the DVS zone multiple times with no valid permit.

Q: How many 3.5hr modules do drivers need to do to qualify for the national DCPC?

A: You still have to complete 35 hours of training. This would mean that 10 sessions would be required for a national CPC.

Q: For compliance when setting up a maintenance provider, do you need to have photos of the workshop and photos of the relevant equipment required such as smoke meter, brake tester etc?

A: There are no requirements for photos of the workshop or equipment. Section 5.1 of the Guide to Maintaining Roadworthiness covers safety inspection facilities in detail, detailing some of the facilities that should be included.

Q: Last year we had repurposed EV's utilising the increased maximum authorised mass weight allowance. Does this apply when the repurposed vehicle is then powered by hydrogen?

A: We would need more detailed information to provide an accurate response to this query, so if you could contact the Member Advice Centre on 0370 605 0000 to discuss this, we can take it further.

Q: The additional weight provision for alternatively fuelled/zero emission vehicles used to only apply to new vehicles. Following input from the engineering forums and Logistics UK, this was extended to include repurposed diesel vehicles now running with electric powertrains. What is the position for repurposed vehicles now running with a hydrogen powertrain?

A: We have asked the question to the Policy Team and are awaiting a response from DVSA.

Q: Just to confirm, if drivers complete half-day DCPC modules, this applies for National CPC only?

A: That is correct.

Q: What date is the briefing on ADR updates?

A: The webinar is being held on the 12 February 2025.

Q: If a driver card only stores data for 28 days, how do drivers produce records for 56 days in Europe if they have not kept printouts?

A: Drivers that have recently renewed or replaced their drivers' card would be able to store this data. For drivers with older cards, they would have to carry the additional information with them in the form of printouts.

Q: How do DVSA propose getting the required signatures for digital TM1 and major changes?

A: This could be achieved by the way of printing the document off, signing the document and then scanning it back in or having the software to digitally sign the documents.

Q: Will an EBPMS printout be a legal requirement or can the brake percentages simply be recorded on the inspection sheet?

A: EBPMS printouts could be used to record brake efficiency as they would be attached to the inspection reports. Similarly, if you were using other methods then it could be recorded on the inspection reports.

Q: All our trailers are fitted with EBPMS, we carry out all maintenance/PMIs in house. Is there a requirement still for a signature as all brake results are stored on our EBPMS portal?

A: Yes, as there would be a need for traceability.

Q: Silvertown Tunnel, what is the ADR Tunnel Code?

A: The tunnel code would be 'E', the same as the Blackwall tunnel.

Q: The guide to maintaining roadworthiness previously indicated that laden brake tests were to be required on every inspection, is the April version now reverting back to four per year?

A: That is correct as the traffic commissioners have taken into account the added cost of laden brake tests and reverted back to four times a year with one being the annual test. From 1 April there is an expectation that every safety inspection will include a brake performance assessment using either an RBT, a suitable electronic brake performance monitoring system (EBPMS) or a decelerometer with temperature readings. If EBPMS is not used it is expected there is a minimum of four laden brake tests spread evenly across the year, this can include the annual test.

Q: Is the load security code of practice also relevant in Northern Ireland? The statement on GOV.UK only says for England, Wales and Scotland?

A: No as Northern Ireland would have their own guidance available from Health and Safety Executive Northern Ireland and/or Police Service of Northern Ireland. The DVSA guidance only covers Great Britain.

Q: For brake testing risk assessment, should these be completed by the operator or maintenance provider?

A: They could be completed by either, but we would advise that they should be completed by the operator, as you would know why the vehicle would be exempt from laden brake testing.

Q: Are there any expected brake testing requirement changes in the Northern Ireland guide to maintaining roadworthiness update due early 2025?

A: Not that we are aware of, but any changes would be communicated through our usual channels.

Q: About the e-learning DCPC, might it be worth noting that with this provision it brings issues for both training providers and operators employing new drivers, whereby if they sit e-learning with another employer or provider the training won't be valid?

A: The course modules would be recorded on a national database for the cards to be issued. This being the case there should be no issues for drivers changing jobs as it would be recorded on the DCPC records

Q: You mentioned lightly laden vehicles under normal operating conditions is an acceptable reason for not carrying out laden brake tests. Our loads fill the vehicle but the kit is very light hence being less than 65% of the axle load, is that acceptable?

A: This may be the case that you would have to use a simulated load when carrying out a laden brake test. Laden brake tests get the most meaningful results, so it may be worth discussing with your maintenance provider in this case.