

White Paper 5

Light Vehicle **Transport Operations**

For Remarketing Businesses



Ensuring Compliance Safety





Contents

Introduction	3
The challenge of compliance in light vehicle transport	4
Defining responsibility: beyond the haulier	5
Core best practices: factors to consider	6
Detailed breakdown of best practices	7
Goods Vehicle Operator's Licence	7
Driver licence categories	8
Driver Certificate of Professional Competence (CPC)	8
Insurance coverage	9
Security of the load	9
Truck equipment suitability	10
Advisory considerations	11
Conclusion: mitigating risk through diligence	11



Introduction

The transportation of vehicles brings a wide range of challenges for remarketing businesses.

Those using transporters with a low carrying capacity gross vehicle weight (GVW) of 3,500kg or less face weight restrictions that may lead to overloading safety issues, while those over 3,500kg encounter an increased level of compliance statutory requirements and increases in running costs.

The potential for non-compliant operations – including issues related to licensing, insurance, vehicle weight, load security and tachograph usage – are considerable.

This paper from the VRA outlines essential best practices for companies engaging third-party hauliers for vehicle transport. It emphasises the shared responsibility between the service provider (haulier) and the service user (such as automotive dealers and leasing companies) in upholding legal standards, ensuring public safety, and protecting brand reputation.

On the following pages, we explain how fundamental checks are needed regarding operator and driver licensing, adequate insurance coverage, correct load securing techniques, and ensuring appropriate vehicle and equipment suitability. Failure to conduct this due diligence creates substantial, financial and reputational risks.

Philip Nothard

Philip Nothard
Chair
VRA





The challenge of compliance in light vehicle transport

The logistics industry frequently encounters instances, often highlighted on social media, of low weight carrying capacity 3,500kg transporters in apparent violation of regulations. Common issues cited include:

- Lack of a necessary goods operator's licence
- Insufficient or incorrect insurance coverage
- Vehicles operating overweight
- Insecurely fastened loads
- Absence or misuse of tachographs where required
- Drivers lacking the correct licence category or driver CPC qualification

There are two sets of controls covering these issues: the goods vehicle operator's licence – or O-Licence – and the road vehicles construction and use regulations. In respect of a goods vehicle operator's licence, this creates obligations to satisfy compliance such as conducting regular safety inspections to ensure roadworthiness and appointing a qualified transport manager who must demonstrate and evidence ongoing training and continued development.

Also, the directors of the company holding the licence must be of good repute, the business have sound financial standing, maintenance carried out to timings that are declared in the licence and controls adopted to monitor drivers.

Meeting these requirements raises critical questions about accountability within the supply chain. While the vehicle owner and driver bear direct legal responsibility, the company commissioning the transport service also has significant moral and commercial responsibility.

Defining responsibility: beyond the haulier

When a transport operation results in an incident or regulatory breach, the focus often falls solely on the haulier and driver. However, the entity using the haulier's services must consider its own culpability, particularly from a perspective of due diligence, corporate social responsibility and brand protection.

Engaging a haulier, whether directly or through an aggregator platform, necessitates verification of their compliance. Relying solely on platform checks may be insufficient, as subcontractors or incorrect equipment might be deployed.

Having a goods vehicle operator's licence should not be taken as proof that the business is compliant and you should ask questions such as verifying their operator compliance risk score (OCRS).

Any responsible O-Licence holder will be happy to share this information.





Core best practices: factors to consider

Remarketing companies engaging vehicle transport services should implement minimum standard requirements for onboarding and vetting suppliers. Key areas for verification include:

1. Licensing:

Does the operation require an O-Licence? Does the driver hold the correct licence category and a valid CPC card, if applicable?

2. Insurance:

Does the haulier possess adequate insurance, including goods in transit cover appropriate for the value of the assets being moved?

3. Security:

Is the haulier aware of and adhering to Driver and Vehicle Standards Agency (DVSA) requirements for securing vehicle loads?

4. Truck equipment suitability:

Is the transporter or vehicle and trailer combination suitable for the specific load? Can it legally carry the weight? Is a tachograph required and correctly used?

5. Vehicle condition:

Has the vehicle been checked for roadworthiness? Is there evidence of walkaround checks and other standard practices?

Detailed breakdown of best practices

This section of the white paper provides a detailed listing of the core requirements of which you need to be aware. It should form the basis of your best practice surrounding vehicle transportation.

Licensing requirements

Goods vehicle operator's licence (O-Licence):

Requirement:

Generally needed if using a goods vehicle over 3,500kg gross plated weight (or 1,525kg unladen if no plate) for hire and reward or business use.

Vehicle and trailer combinations:

An O-Licence is usually required if the combined maximum laden weight (or unladen weight) of the towing vehicle and trailer exceeds 3.5 tonnes when used for hire and reward or business.

Simple guideline:

If a vehicle over 3,500kg, or a vehicle towing a trailer where the combination exceeds 3.5 tonnes, is used for hire or reward, an O-Licence is likely required.

Dual-purpose vehicles and trailers:

No Licence needed: If the towing dual-purpose vehicle has a manufacturer's unladen weight less than 2,040kg and is towing a trailer (even up to 3,500kg).

No O Licence needed:

If the towing dual-purpose vehicle has a manufacturer's unladen weight greater than 2,040kg and is towing a trailer for hire, reward or business purposes where the combination exceeds 3.5 tonnes.



AM 	C1 	CE 
A1 	C 	D1E 
A2 	D1 	DE 
A 	D 	L 
B1 	BE 	T 
B 	C1E 	

Driver licence categories:

Category B:

Required for vehicles up to 3,500kg or dual-purpose vehicles towing a trailer.

Category C1:

Required for vehicles over 3,500kg but under 7,500kg gross vehicle weight (GVW).

May include restriction code 107 (vehicle not more than 7,500kg).

Allows driving combinations up to 8,250kg gross train weight (GTW).

Category C1+E/CE:

Required for vehicle/trailer combinations exceeding 7,500kg GT

(C1+E typically covers up to 12,000kg GTW).

Driver Certificate of Professional Competence (CPC):

Required for drivers operating vehicles over 3,500kg GVW for hire or reward.

Exemption: May apply when driving a dual-purpose vehicle towing a trailer not exceeding 3,500kg.



Insurance coverage

While basic motor insurance (third-party minimum) is a legal necessity, comprehensive cover is recommended.

Crucially, businesses must verify the haulier holds:

Public liability insurance:

Covers injury or damage to third parties.

Employer's liability insurance:

Legally required if the haulier employs staff.

Goods in transit insurance:

Essential cover for the value of the vehicles being transported against damage or loss during transit. The level of cover must be adequate for the specific assets.

Security of the load

Adherence to the DVSA guidelines on load securing is critical.
Specific best practices exist for vehicle transport:

Reference the "Vehicle Logistics Safe Loading Code of Practice"

Ensure all four wheels of the transported vehicle are adequately secured using appropriate restraints.

Apply the handbrake of the transported vehicle.

Lock the transported vehicle during transit.

Truck equipment suitability

Load capacity:

3,500kg transporters:

These have limited payload capacity, typically ranging from 1,450kg to 1,600kg, depending on the specific truck chassis and body. This weight must account for the driver and fuel. Given the increasing weight of modern cars (especially electric vehicles), these transporters are easily overloaded.

Vehicle and trailer combinations:

A common setup involves a towing vehicle and a 3,500kg gross weight trailer. This typically offers a higher payload, often around 2,400kg but if they have additional equipment such as power winches or tilt operations this will increase the unladen weight.

Larger transporters (5,000kg GVW & over):

Offer significantly higher payloads capable of carrying most production cars legally.

Tachographs:

Requirement: Any vehicle or vehicle and trailer combinations exceeding 3,500kg GVW or GTW used for hire or reward must be fitted with a calibrated tachograph.

Usage:

The tachograph must be used correctly, and operations are subject to EU/AETR driver hours rules, including mandatory rest periods. This applies even to dual-purpose vehicles towing trailers if the combination weight and usage criteria are met.



Advisory considerations

While section five covers mandatory and best practise requirements as an operator, you should also consider these factors:

Specific servicing schedules on trailers that have high mileage usage, especially around brakes and coupling components.

Daily walkaround checks to inspect vehicles and trailers, even those not required as part of an operator's licence requirement.

Trailers should carry a spare wheel and wheel nuts should be tightened with click torque wrench.

Dashcams fitted into vehicles to support in claims and protect your driver.

Supply and mandatory use of the correct PPE equipment for the driver.

Conclusion: Mitigating risk through diligence

The complexities surrounding vehicle transporter regulations underscore the need for robust vetting processes. While cost pressures are very real, the potential consequences of using non-compliant operators are severe. A single incident involving an overloaded, uninsured, or illegally operated transporter can escalate from minor regulatory breaches to catastrophic accidents, potentially resulting in:

- Significant financial penalties
- Legal action against all involved parties
- Irreparable damage to brand reputation
- Injury or loss of life
- Financial impact to the wider economy following an accident that affects the road network

The industry must collectively take ownership of this issue. Implementing rigorous checks on licensing, insurance, load security and equipment suitability is not merely a regulatory burden but a fundamental aspect of risk management and responsible business practice.

Moving beyond reliance on assumptions or lowest-cost options towards verified compliance is essential for the safety of all road users and the integrity of the automotive logistics sector.

As always, being part of the VRA provides access to considerable expertise in this area from a wide range of remarketing businesses.



The Vehicle Remarketing Association exists to promote networking and provide essential briefings for companies who work in the handling, selling, inspection, transportation and management of used vehicles.

We aim to help our members – who together process more than 1.5 million cars, vans and trucks every year – to forge new and productive links as well as share good practices to help them prosper in a rapidly changing and challenging environment.

The VRA creates a crucial environment where industry issues are addressed by the sector's leading experts in a collegiate and constructive manner. As a result of this successful approach, the Association has expanded by 25% since 2020.

The key objectives of the VRA are:

- To create better awareness of the activities of professional remarketing
- To raise standards and generate an accepted best practice across the industry for key disciplines like vehicle inspection
- To provide a much needed voice to represent the sector in the trade and consumer media on issues which affect remarketing suppliers and customers
- To provide an effective focal point through which major matters concerning those involved in remarketing can be addressed
- To raise the profile and professionalism of the industry to ensure recruiting good quality people becomes much easier
- To generate views and opinions of the industry for use in lobbying for the greater good of the remarketing sector
- To create a forum where members can network, exchange views, debate key topics and share best practice

For more information contact:

info@thevra.co.uk

www.thevra.co.uk