

## **CIRCULAR 0-3-8**

### **THE USE OF ADHESIVE LABELS FOR COMPLIANCE PLATES**

#### **INTRODUCTION**

Requests have been made to allow the optional use of adhesive labels as an alternative to metal compliance plates. The Administrator has agreed that, provided the requirements below are met, the optional use of adhesive labels is acceptable.

This Circular supersedes the relevant parts of Circular 0-3-2 "Compliance Plates", which deals with material, affixing and positioning of compliance plates. All remaining parts of Circular 0-3-2 continue to apply.

#### **APPLICABILITY**

This Circular applies to manufacturers of new vehicles who are permitted to produce their own compliance plates.

#### **REQUIREMENTS FOR ADHESIVE LABELS**

Adhesive compliance labels must meet the following;

- (a) The label must be designed to last the life of the motor vehicle in the position on the vehicle to which it has been affixed.
- (b) The label must contain the VIN in readable text. A VIN barcode must be included in the label. The format of the barcoding must be submitted to the Administrator when requested.
- (c) The manufacturer must replace any label found to be defective. A replacement adhesive label or a letter of compliance may be provided where a lost or accidentally damaged label can be proven.
- (d) Removal of the label must cause the label to self-destruct by tearing or rendering the text on the label illegible.
- (e) It is desirable that the removal of the label must discernibly alter the appearance of that area of the part where the label was affixed by leaving residual parts of the label or adhesive in that area, so that investigators will have evidence that a label was originally present
- (f) Alteration of the VIN on the label must leave traces of the original VIN or otherwise visibly alter the appearance of the label material.
- (g) The label and the text must be resistant to counterfeiting.
- (h) The logo or some other unique identifier of the vehicle manufacturer must be placed in the material of the label in a manner such that alteration or removal of the logo visibly alters the appearance of the label.