

Questions answered during RVSA Industry Webinar #27 Thursday 26 October 2023	Score	Response
There still seems to be a huge disparity in approval wait times. Some are approved unbelievably quickly (what can you check in 4 hours for a brand new VTA application) and some are still in the queue close to the 60-day statutory limit. The variability simply doesn't make any sense. STATS please.	6	The majority of applications are being processed well within the legislated timeframes. There are many reasons why one application may be assessed faster than another, including the complexity, quality and specifics of the application, for example, the particular vehicle model or whether you are requesting M&I. Assessment timeframe statistics will be available shortly.
Recently when starting variations, information such as RVD photos etc are missing from the application. How is the department dealing with data dropping out, when that is our only source of complete application data given there is no offline record?	2	When starting a variation application, the data you add to your application should not be disappearing once saved. If this occurs, please send an email with the details to ROVERinfo@infrastructure.gov.au so that it can be investigated. We are aware of a previous issue with RVD photos and this has been resolved.
With regard to Brake Testing, previously the department would accept worst case testing. For example testing to the NA requirements to cover a vehicle that might be offered as both NA and NB1 . (Using NB1 masses but NA speed and decel requirements.) Is this still allowable?	2	The department met with interested parties on 27 November to discuss brake testing concerns. Responses to the group will be shared before being published.
Are there further improvements coming for improving ROVER speed?	3	System performance is always a consideration when making changes to ROVER. For the last ROVER release (8C) there were minor improvements made and we will look to further enhance the performance of ROVER in future releases.
Processing times remain very inconsistent. You can submit 5 almost identical applications for the same manufacturer and have 4 approved within a week, and then it takes over a month for the 5th? How is that possible?	5	The majority of applications are being processed well within the legislated timeframes. Although some applications may be identical, the processing timeframe may vary due to several factors, including when the assessor(s) starts assessing the application and where the application sits in the assessment queue.
RAV submissions have not been going through because someones email address gets 'quarantined'. Departments response was to let them know if you don't get a reply, however surely there can be a better system where RAV Submitters emails get added to a 'safe senders' list.	2	We are investigating this issue and will resolve it as soon as possible. Meanwhile, we are regularly checking for and clearing quarantined emails to ensure RAV submissions are processed quickly.
Is it Possible for NB1 category vehicles to also operate under the SFV regs? What happens in the instance that an SFV NB2 vehicle is GVM downgraded to NB1 under VSB 6 S1/S2 - does the vehicle still comply given it will be o/w?	1	ADR 43/04 only allows NB2 and NC vehicles to exceed 2,500 mm, and the RVS legislation only covers the first provision of vehicles to the Australian market, not in-service vehicles. You should contact the relevant registration authority if the vehicle category changes and exceeds the overall width for the new vehicle category.
Under RVSA can the department clarify the use of "Motor Vehicle Standards (Approval to Place Used Import Plates) guidelines 2006 (No. 1)" as there is precedent for it with multiple current model report approvals.	7	When developing a Model Report, applicants should comply with both the <i>Road Vehicle Standards (Model Report) Determination 2021</i> and <i>Road Vehicle Standards (Model Reports – Compliance with Standards) Determination 2021</i> to ensure they meet legislative requirements, including applicable standards. The Motor Vehicle Standards (Approval to Place Used Import Plates) Guidelines 2006 (No. 1) (MVSA determination) is no longer in force. The decision maker is able to consider substantial compliance with the Model Report – Compliance with Standards determination where an applicant is able to demonstrate the non-compliance is only in minor and inconsequential (M&I) respects. The applicant could refer to concessions that were previously available in the MVSA determination as part of the justification for the non-compliance being M&I. However, exclusive reliance on the MVSA determination will not be sufficient to demonstrate compliance with an ADR. This principle also applies to later versions of standards not referenced in the MVSA guidelines as applicable to the vehicle. Model Reports must always meet the full requirements outlined in <i>Road Vehicle Standards (Model Report) Determination 2021</i> .

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In order to minimize the lead time to obtain a VTA, is it possible to submit a VTA application while a relevant CTA is pending? If not, is it possible to obtain an interim or "dummy" CTA number to be used in the VTA application?	1	<p>We do not recommend submitting a vehicle type approval application while awaiting approval for a component type approval application and we are unable to provide a 'dummy' number to be used in the interim.</p> <p>You may be able to submit a request for the component type approval to be assessed as priority, but first check that it meets the required criteria. For more information visit www.infrastructure.gov.au and search 'requesting priority assessment'.</p>
Pt. 1 Even though off-road vehicles, standing passenger buses, etc are exempt from certain ADR requirements (such as ESC ADR 35/07, LDWS ADR AEB 97/00), would these vehicle categories over 2,500mm still fall under the SFV scope given they are fully ADR compliant?	3	ADR 43/04 only allows NB2 and NC category vehicles to exceed 2,500 mm in accordance with the Safer Freight Vehicles package of amendments. Other vehicle categories have a maximum overall width of 2,500 mm regardless of whether they meet ADRs updated as part of the Safer Freight Vehicles amendment.
Pt. 2 As per the recent SFV summary guide, "These vehicles are referred to as safer freight vehicles. They include all vehicles that have met the national road vehicle standards required for them to exceed an overall width of 2,500 mm"	1	The amendment to the definition of 'overall width' applies to all vehicle categories.
There are some concerning trends/issues developing in the RAWs/AVV arena. Has the department been conducting Audits and if so, is there any feedback on these audit results?	3	<p>We are unable to provide information on results while compliance and enforcement activities are being undertaken.</p> <p>If you have a safety or non-compliance concern, we encourage you to report it to us. For more information visit www.infrastructure.gov.au and search 'report non-compliance'.</p>
When will the assessment team provide communication as to why they have changed what is acceptable for SSM testing evidence and what they expect to see?	2	Testing evidence requirements are treated equally across all manufacturers and the requirements have not changed. What has changed under the Road Vehicle Standards legislation is the need for applicants to provide testing results and not just a summary.
The technical team need to host a webinar to clearly spell out requirements for SSMs in terms of testing evidence and why it has changed	5	Recently, when assessing evidence provided in applications, we have seen that testing has not been done in accordance with the expectations set out in the ADRs.
It seems as though the technical assessors are increasingly looking for ways to reject SSM applications and not providing clarity on what is required or what it has changed?	2	
It is very common when accessing a previously submitted application, to find data missing, such as ECE approval numbers, test report details, etc. This is a major issue as there is no other way of accessing this information or downloading an offline version to keep as a record.	1	<p>If this occurs, please send an email with the details to ROVERinfo@infrastructure.gov.au so that it can be investigated.</p> <p>We are aware of the issue with ECE approval numbers and it was recently fixed. We will continue to check this issue to ensure it has been fully resolved.</p>
When updating a Variation as a result of an RFI, we have to withdraw the Variation, update and then resubmit. When updating the Variation, all attachments and reference to attachments dropped off. Are attachments still present but invisible, or are we forced to re-attach all of the documents again?	2	<p>If attachments have been previously submitted, they should be available and you should not have to reattach them.</p> <p>If this occurs, please send an email with the details to ROVERinfo@infrastructure.gov.au so that it can be investigated.</p>
There are multiple approved model reports for the same make and model. The difference between these approved model reports is only minor. Are vehicle importers allowed to choose a different model report for demonstrating compliance at the time of AVV sign off based on the features of the car?	5	When applying for a concessional RAV entry approval, the applicant must already have access, or be able to access, an approved Model Report that applies to the vehicle. This Model Report must then be used by the RAW to modify the vehicle and by the AVV to verify the vehicle. The Model Report cannot be chosen or changed at the time of AVV sign off.
Is it possible to see all attachments that are on a current Vehicle Type Approval? Upon looking back at a Vehicle Type Approval is not possible to see attachments, or names of attached files. We do not know what the department has registered against a Vehicle Type Approval.	0	<p>Attachments are stored against the submitted application. When you vary an approval, the documents you upload to the vary application will only appear in that application. Similarly, documents attached to the original application will not get copied to the variation application.</p> <p>To see all the submitted documents, the user will need to access all applications relevant to the approval.</p>

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How are Model reports being approved by the department when they clearly do not meet the evidence guidelines set by the RVSA? Furthermore, the work instructions/verification checklist being approved do not meet the RVSA guidelines.	2	We are unable to address this without specific information about the Model Report in question. This sounds like a compliance issue and we encourage you to report it to us. You can do this in ROVER or visit www.infrastructure.gov.au and search 'report non-compliance' for more ways to report it.
Could you provide an update on ADR 109 and ADR 110. The draft applicability dates are upcoming but I have not seen any updates since the draft release early this year	2	The ADRs were signed by the Minister on 31 October. They have been published on the Federal Register of Legislation. To be notified when new ADRs are made or amended, subscribe to our 'ADR Notification' service. Find the link to subscribe on our 'RVS contact us' webpage.
what happens when the public RAV search info of a trailer does not match the actual physical compliance plate fitted? eg. date of manufacture or the atm/gtm or model name. does that trailer need to be recalled? or does the manufacturer have to amend the data on RAV? or send a new compliance plate?	0	Approval holders are required to enter accurate vehicle information on the RAV and amend any errors as soon as practicable after becoming aware of it. An approval holder can submit an amendment request via ROVER. The vehicle plate fitted in accordance with ADR 61/03 would be fitted before a vehicle is added to the RAV and may duplicate information on the RAV. If you are aware of an error on the RAV, you can notify the manufacturer and report it to us by emailing vehiclecompliance@infrastructure.gov.au
Will further guidance material be supplied to replace the selection of fleet circulars for ADR 35 that existed under RVCS?	1	Vehicle manufacturers must ensure all vehicles comply at the time they are added to the RAV. As such, it is up to applicants to be able to satisfy the department, where necessary, that testing has been undertaken to show that the range of vehicles in a vehicle type complies.
The prior system (RVCS) had a "whats new" section, where changes to forms will be communicated (tabulated with version control). Does ROVER have this currently, can version control be applied to ROVER webforms. We notice changes to some webforms, can there be a notification process introduced	1	We publish information on what is changing in each ROVER release on the department's website. We describe what is changing, who is affected, provide links to updated guidance and videos demonstrating the changes. Visit www.infrastructure.gov.au and search 'ROVER Release'.
Can you provide clarification on modifications of suspension vs modification of brake systems and how that impacts ADR 35/0x testing requirements. Modifications to suspension springs are being treated as a modification to a brake system.	2	Refer to Admin Circular 35/06-2-1 for guidance on worst case testing for brakes tested to ADR 35/06. If testing to ADR 35/07, also refer to worst case requirements related to Vehicle Stability function testing as listed in the ADR.
Can you please clarify the acceptance and use of Test Reports by overseas Designated Testing Services under the WP29 1958 agreement. What would be the correct Compliance Information category (e.g. Test report details or Any matter or thing specified in the national road vehicle standard)	4	Subsection 19(2) of the Road Vehicle Standards Rules 2019 outlines the matters that can be taken into consideration, including the results of testing from an approved testing facility, an approval or other document issued by the government of a foreign country that is a contracting party to the 1958 Agreement, or by a person who is a competent authority of such a government for the purposes of that agreement. If a testing oversight body, for example Technischer Überwachungsverein (TUV, Germany) and Vehicle Certification Agency (VCA, UK), is issuing the document that indicates the vehicle complies with the requirements, then enter the information in ROVER using 'information supporting a declaration'. Please also provide a copy of the UN test report.
Are there specific guidelines or regulations in place for determining the width measurements of standard vehicles (2.5m) fitted with safety devices/features and safer freight vehicles (2.55m)?	1	The Safer Freight Vehicles package of ADRs has amendments to the definition of overall width to exclude certain devices from the measurement. The 'Guide to Safer Freight Vehicles' on the department's website lists the new and amended vehicle standards. Visit www.infrastructure.gov.au and search 'safer freight vehicles'.
Do we know when the next RAV outage will take place? Thank you	0	There are no planned RAV outages at this stage. Planned outages are communicated on the ROVER homepage and via other established channels.
What is the notice period for an audit? It is not possible disrupt a production facility and provide safe access to auditors at a moments notice.	3	There are 3 types of inspections in terms of notice - no notice, short notice and long notice. The type of notice depends on the type and depth of inspection activity. For example, for no notice, inspectors will turn up during business hours, whereas for long notice, an appropriate time will be arranged up front. For more information, search 'compliance and enforcement' on the department's website: www.infrastructure.gov.au
Does a change in spring constitute a unique braking system?	2	A changed spring alone does not constitute a unique braking system.

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Further clarification needs to be provided on how much of the first stage VTA can be relied upon for compliance. If we are changing springs in a vehicle to change the max weight it makes sense to test that condition, but why are we now needed to test things like warning lights that are unchanged	2	<p>As a SSM, you are expected to control the design and manufacturing of the processes you are undertaking. You are also expected to have access to the required information and support from the vehicle type approval holder of the base vehicle, or to have a detailed system in place to verify that the base vehicle's design has not changed.</p> <p>Please send the details to ROVERinfo@infrastructure.gov.au about RFIs related to warning lights. The department will look into the specifics of this case to further improve assessment processes.</p>
In CI form for 53/00 the form always drops out 'Rear Position Lamp' when this is selected from the drop down.	1	<p>This issue was fixed in a recent ROVER release.</p> <p>If you are still experiencing this issue, please send an email with the details to ROVERinfo@infrastructure.gov.au so that it can be investigated.</p>
As an SSM, is any extra evidence required to justify a reduction in GVM (remaining same category) assuming the affected ADRs are tested at the new GVM	1	<p>If reducing the GVM of the vehicle results in a change of the vehicle category, there are implications and additional evidence may be required. However, generally, if the vehicle category does not change, then additional testing is not required. A case-by-case judgement should be made by manufacturers on what is worst case and being changed on the vehicle, then deciding whether any extra evidence needs to be provided with the application.</p>
Can we have data for brake system components published for all CTAs? There's continuing drama getting accurate information from suppliers, we need to have accurate data for brake calculations.	0	<p>A condition of a component type approval is that the approval holder must provide fitting instructions that, if followed correctly, will ensure that the vehicle will comply with the applicable ADR for the approved component.</p> <p>If this is not being provided, we encourage you to report it to us. For more information visit www.infrastructure.gov.au and search 'report non-compliance'.</p> <p>Additionally, an approval holder may publish a datasheet that can contribute to complying with their condition of approval, however, this is not mandatory.</p>
Do we have any visibility on the contents of next ROVER release	0	<p>We are unable to provide information on the next ROVER release at this time. We will notify industry in advance and communicate the changes via our industry webinars, newsletters, and on ROVER and the department's website.</p>