



Dr Warren Mundy
ADR Independent Reviewer
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
Canberra, ACT, 2600

Friday 24 January 2025

Dear Dr Mundy

Thank you for the opportunity to provide a response to the Australian Design Rules (ADR) Harmonisation Review 2024-25. This response is provided on behalf of the Commercial Vehicle Industry Association (CVIAA) of Australia and the Motor Trades Association of Australia (MTAA).

CVIAA is the national, peak industry association representing suppliers of parts, services, repairs and modifications to the Australian heavy vehicle industry. CVIAA is a national committee of the Motor Trades Association of Australia (MTAA), the national body representing the automotive chambers of commerce and automotive trade associations across each state and territory.

Based on CVIAA member consultation, the following feedback is provided for your consideration as it relates to the ADR Harmonisation Review 2024-25:

Member consultations have raised concerns about the ongoing issues with the ADRs and their impact on the heavy vehicle industry, particularly in the areas of compliance and regulatory processes. While we understand the intention behind the ADR review process, we remain increasingly concerned that it is not yielding the practical changes needed to support the heavy vehicle industry. Nonetheless, we would like to take this opportunity to raise several key issues that continue to affect the sector, with the hope that addressing them will help ensure the ADR and compliance processes are both relevant and effective.

Below are three key areas where improvements are urgently needed:

1. Misalignment of ADR14 with UN ECE Standards

One significant issue is the discrepancy between ADR14 and the UN ECE standards. According to UN ECE regulations, if a full vehicle is ECE-approved, cameras can be used as indirect vision devices in place of mirrors. However, under the current ADR14/02 regulations, heavy vehicles that are second stage manufactured in Australia to incorporate these devices cannot be made compliant. As a result, mirrors are still required, even when modern indirect vision systems are installed. This misalignment limits the potential for innovation and creates unnecessary regulatory hurdles.

Recommendation: Amend ADR14/02 to align with UN ECE standards, allowing the use of camera-based indirect vision systems as a substitute for traditional mirrors in heavy vehicles, to foster innovation and eliminate unnecessary regulatory barriers.

2. Inconsistency in Marking Plate Requirements in NSW

Another concern is the differing requirements for Marking Plates in New South Wales (NSW), which



are not consistent with those in the other states and territories. As outlined in VSB12 Plate Selection and Combination (p.2), NSW has implemented a requirement that diverges from the national standard, creating confusion for operators. This situation means that heavy vehicles crossing state borders into NSW may be considered non-compliant and therefore unable to legally operate in that jurisdiction, leading to unnecessary regulatory burdens and operational challenges.

Recommendation: Standardise the Marking Plate requirements across all states and territories, ensuring NSW aligns with the national standard outlined in VSB12, to eliminate confusion and reduce regulatory burdens for operators crossing state borders.

3. Inadequate Understanding of ADRs in the ROVER System

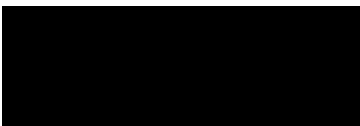
Finally, there is an ongoing issue with the ROVER system, particularly with the assessment officers' understanding of the ADRs they are responsible for enforcing. A recent example involved a request for compliance information regarding glazing against ADR 08/01 for a trailer. In this case, the trailer in question had no glazing, and ADR 08/01 does not apply to trailers. Such errors result in unnecessary delays and wasted resources, highlighting the need for more comprehensive training and clearer guidance for officers assessing ADR compliance.

Recommendation: Enhance training programs for ROVER system assessment officers, with a focus on the specific ADRs they are responsible for enforcing, to improve their understanding and reduce errors in compliance assessments.

These are just a few of the issues that continue to undermine the effectiveness of the ADR and compliance process. CVIAA and MTAA strongly encourage a more focused review that addresses these specific concerns impacting the heavy vehicle industry and other critical concerns outlined in the MTAA submission, ensuring that regulatory practices are aligned with industry needs and international standards.

Thank you for your attention to these matters. CVIAA and MTAA maintain our willingness to work with you as the review progresses. Should you like to discuss this submission further, please do not hesitate to contact Dr Imogen Garcia Reid, CVIAA secretariat, at your convenience [REDACTED]

Yours sincerely,



Clive Polley
President
Commercial Vehicle Industry Association of Australia