

Submission 32: RVS Legislation Consultation

Review – RVSA

Road Vehicle Standard Bill [RVSA] 2017 Review

Road Vehicle Standards Bill 2017

The removal of Import Approvals is a sensible initiative, with vehicles associated with a valid Type Approval deemed to be satisfying importation requirements. However, it is not clear how Customs and import authorities will determine that a valid Type Approval is in place to expedite clearance. It is worth noting that many buses are currently imported in an ‘incomplete’ condition, requiring the fitment of seats locally. Within the new RVSA such vehicles would not yet be entered into the RAV, with no quick reference for import agencies to determine the validity of the Type Approval.

- **Has a process been developed to ensure no complications in vehicle importation for vehicles with a valid Type Approval; but not yet included on the RAV?**

Road Vehicle Standards Rules 2017

Part 3 Division 2 Section 27 Clause 2 requires that updates to road vehicle standards have the appropriate evidence submitted against valid approvals a minimum of 60 working days prior to the applicability date. This has the potential to be extremely problematic for bus manufactureres when the updated road vehicle standard is related to a SARN approval. In effect the SARN approval would need to be updated and approved by the department more than 60 days prior to the implementation date to enable the vehicle type approval holder to meet this requirement.

- **What consideration has been given to the processing of approval updates that are associated with ‘sub level’ approvals such as SARNs and CRNs?**

Bus manufacturer’s rely heavily upon the detailed information provided upon Sub Assembly Data Sheets (SADS) associated with SARN approvals. SADS are currently a compulsory requirement of SARN approval holders.

- **Will CTA approval holders that previously held SARN approvals be required to complete SADS in alignment with the current system?**

Road Vehicle Standards (Consequential and Transitional Provision) Bill 2017

The RVSA allows for an ‘Opt in’ period of 6 months under the “Consequential and Transitional Provision Bill”. The apparent intent is that the ‘Opt in’ period does not require re-submission of evidence to validate

compliance with the applicable road vehicle standards. Bus Type Approvals likely to take advantage of the 'Opt in' facility include many 'sub' approvals in the form of SARNs and CRNs.

- **Given that the 'Opt in' period is designed to allow the roll over of current approvals it would seem reasonable to expect that this will not require Type Approval holders to wait upon sub-level 'Opt in' transitions of SARN and CRN approval holders. Can the department please confirm our understanding is correct?**

Cost Recovery Implementation Statement

Costs associated with maintaining vehicle model compliance are unclear, but evident. "Application for road vehicle type approval variation" is now explained as incurring cost, but it is not clear what a variation is. Currently there are no costs associated with maintaining and updating approvals. It is worth noting that in the bus manufacturing industry, product customisation is high and current IPA's are almost constantly updated to reflect the addition of new product fixtures and options. Also, OEM chassis platforms currently regulated by the SARN process are updated regularly which consequently constitutes updates to the IPA approval. If all such approval maintenance is to be considered a variation incurring costs – the costs to manufacturing will be substantial, far outweighing the removal of Compliance Plate costs.

- **What is considered to constitute a variation?**
- **Is it reasonable for the manufacturing industry to absorb these new costs?**

The RVSA requires all Type Approvals to be re-applied for every five years. While not entirely clear within the RVSA documentation, it has been discussed that this will incur an application cost. Bus manufacturers will frequently hold a reasonably large number of Type Approvals, with the quantity of product sold annually per Type Approval being reasonably low.

- **Have the department rationalised the cost to industry for the reapplication of Type Approvals?**
- **In what capacity has this been addressed in the Cost Recovery Implementation Statement?**

Additional Comments

We are not sure that the RVSA addresses PFID and DFID registrations.

- **Will introduction of the RVSA require reapplication for PFID and DFID registrations?**
- **Has the process changed for PFID and DFID applications?**

Currently, ADR61 requires ME category vehicles to be fitted with a Vehicle Plate defining a fixed set of data describing the vehicle. Within the current MVSA, ME category vehicle providers fulfil this requirement through the data included upon Identification Plates. A proportion of the Cost Recovery Implementation Statement justifies new costs, through the removal of Identification Plate costs.

- **Under the RVSA, will any form of Identifying Plate be required in the absence of current Identification/Compliance Plates?**
- **Under the RVSA, will ME category vehicles be required to fit Vehicle Plates in accordance with the requirements of ADR61?**

The RVSA does not make mention of Sub Assembly Registration Number (SARN) approval plates. These are currently required within the MVSA under Circular 0-4-23. The fitment of a SARN plate is designed to confirm that Bus Chassis' (BC) are in compliance with all current ADRs.

- Will SARN plates be required under the RVSA?
- If SARN plates are not to be mandated, what system will be put in place to ensure bus manufacturers that chassis approvals are valid and that the supplied chassis aligns with the associated SARN?