

## Submission 42 – RVS Legislation Consultation

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Administrator of Vehicle Standards:

### 1) RAV

Vehicles of current date of manufacture or import should attract a concessional RAV status (as per a type approval pathway). Each and every vehicle (particularly **non** MA and L category) should transform the concessional RAV status to the final RAV status just prior to 1st registration. This would be consistent with ppsr vehicle records.

Notably ADR category type vehicles MB, MC, NA, NB, NC are not fit for final owner / operation requirements. In the case of NC vehicles they must be fitted with a turntable, hitch, body, mudguards, side and rear illumination, air lines, ABS and EBS lines, bull bars, additional lights, front LED bars, cabin air conditioners, hydraulic tanks and pumps, pneumatic discharge blowers or vacuum pumps, etc.. etc..

### Vehicle Testing

Vehicle testing involving 'on road' brakes, handling and fire risk testing should not be conducted on public roads.

### Vehicle Testing Insurance

The DOIRD should arrange principal arranged insurance (PAI) (or provide the necessary insurance cover) for the

- vehicle under test,
- personnel conducting and/or observing the testing,
- and a minimum public liability cover whilst conducting the testing.

It is grossly incorrect, subject to a Chain of Responsibility environment, for DOIRD to demand mandatory extensive high risk vehicle testing yet do not elect to ensure such testing is conducted safely and subject to full insurance cover.

Existing compulsory registration third party personal and property insurances do not include provision for vehicle testing. Ditto for personal life and loss of income insurances for test vehicle drivers, in vehicle observers and (test track) observers.

### Test Facilities

Should be completely independent. Hence the same should be funded by Governments as extensions to selected University facilities with at least one test centre per State.

Advanced in the interests of inherent road safety.

Yours faithfully,

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