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2018 PUBLIC CONSULTATION ON THE NEW ROAD VEHICLE STANDARDS LEGISLATION

To:

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Submission by:

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Below are my comments relating to the proposed MVSA changes:

1 TEST FACILITY APPROVAL

To streamline the process of TF approval, there should be a system to reciprocally recognise UN ECE approved test facilities (Technical Services) at no or minimal cost by way of registration without pre-audit or submission of documentation. Perhaps a standard form could be used for this process. Public doc UN ECE WP29 doc 343 lists the approved technical services for each signatory country under each UN Reg. (see Att 1 and 2)

<http://www.unecce.org/trans/main/wp29/wp29wgs/wp29gen/wp29fdocstts.html>

Where there are direct linked ADR, the TF should be exempt from approval as they would not be subject to audit under the RVSA.

For example, Technical Service 9/E is approved for ECE R78 testing and therefore should automatically be approved for ADR 33/00.

2 DEFINITION OF PROVIDING

The definition of providing should explicitly address provision to dealers.

Will it be permissible to have a motorcycle in the possession of the dealer that has not been entered on the RAV? Could that motorcycle be shown to customers but not test ridden (on private or public property)? As is the case under the MVSA, under RVSA it would not be permissible to allow customers to use this vehicle in transport for test rides without compliance plates or RAV registration.

3 DEFINITION OF BUILD DATE

The definition need to be clear for motorcycles (L group vehicles) which can be delivered to dealers in knock-down format to varying degrees. For example, without mirrors attached or without wheels attached.

Compliance plates are fitted to L group vehicles at different times compared to cars where it is normally the time the engine is mounted to the rolling chassis. For motorcycles it can be:

1. start of production line when the VIN is stamped on the frame
2. end of production line when the vehicle has inspection before boxing
3. prior to distribution - when Australian specific components are added to the crate by the importer/distributor
4. at final assembly by a dealer (acting as agent of the Licensee).

Options 3 and 4 should remain with regard to entry on the RAV.

Dates on compliance plates relate to the above options and in some cases plates fitted on the production line will be post dated to match the date the vehicle will be in Australia and distributed or launched by the importer/distributor.

Entry on the RAV should mirror this flexibility. It should be permissible to lodge vehicles to the RAV and NEVDIS when they are shipped and allow the build date to be post dated to correspond when the vehicle will land and be dispatched. There could be a limit on this post-dating, eg 90 days.

4 RAV DATA

If power is to be recorded in the RAV entry then it needs to be with 1 decimal point as this matches the L group RVD and can be critical in determining the LAMS (Lerner Approved Motorcycle Scheme) qualification.

Seating capacity is relevant to motorcycles, particularly with QLD having a special registration class for single seat mopeds.

This represents a golden opportunity for collection of vehicle data that is useful and required by the State/Territory Registration Authorities for registration. All registration parameters should be recorded

The RAV data requirements chart should identify mandatory and optional fields as a matrix for the various vehicle categories.

5 APPROVED VEHICLE VERIFIERS (AVVS)

AVVs should not be required to own their own equipment as in many cases current test facilities will hire test sites and equipment to perform ADR tests. Additionally, inspections such as 0-4-5 and RAWS are normally performed at the manufacturer's premises where hoists etc are available.

6 NEW LOW PRODUCTION PASSENGER CAR SCHEME

Will this scheme be cancelled or adapted into the concessional pathway. I attempted to use this scheme for a client when they produced their first motor car. Unfortunately we could not meet the eligibility criteria because global production was deemed to include L-group vehicles. This seemed grossly unfair as the scheme is specifically for category MA vehicles.

The criteria should be clarified to only count passenger cars, eg MA and possibly MB & NA.

Also, the production limits for eligibility were lower than in Europe, 500 vs 1000.

7 IMPORT PATH/OPTION – LETTER OF COMPLIANCE

This import options should be maintained. This allows individuals to order a vehicle in Australian complying spec (with or without a compliance plate), take delivery in another country, use it in touring or events and then later import the vehicle to Australia for registration and road use.

8 LINKS TO MANUFACTURER

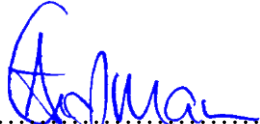
Formal links to manufacturer are a key feature of the RVSA.

VSS should prepare a standard template that production facilities and manufacturers can submit to link them to the Licensee/approval holder. This should not exclude the option for them to submit their own declarations to meet this requirement.

9 SECURE VEHICLE ID (ADR 61/02)

European made motorcycles require a statutory label with the VIN and EWVTA number in addition to other information. This must be an anti-tamper label. This should be acceptable as the secure vehicle ID under changes to ADR 61/02. If additional requirements are imposed by ADR 61/02, eg holographic layer, encoded VIN, etc, then cost saving quoted by changing compliance label/plate fitment to a RAV entry simply do not exist.

It should also be permissible to fit an aluminium plate as it has been for compliance plates.



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