

## Submission 69 – RVS Legislation Consultation



Ref: AU16022018

Friday, February 16 2018

Attention:

DEPARTMENT OF INFRASTRUCTURE AND REGIONAL DEVELOPMENT  
[MVSAreview@infrastructure.com.au](mailto:MVSAreview@infrastructure.com.au)

Subject:

EXPOSURE DRAFT, ROAD VEHICLE STANDARDS RULES 2017

Introduction

Thank you for the opportunity to provide this submission on the Department of Infrastructure and Regional Development's Exposure Draft of the Road Vehicle Standards Rules 2017. We make this submission in response December 13<sup>th</sup>, 2017 release of the Exposure Draft for consultation and requested feedback from interested parties.

Who is JEVIC?

Japan Export Vehicle Inspection Center Co, Ltd (JEVIC) is a global inspection organization established in 2001.

JEVIC is an independent vehicle inspection body accredited ISO/ IEC 17020:2012 Type A and a member of the International Federation of Inspection Agencies (IFIA). JEVIC is the parent company of Vehicle Inspection New Zealand (VINZ), an authorized Key Service Delivery Partner (KSDP) in New Zealand delivering regulatory vehicle inspections and services.

Contact:

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## **Feedback**

### **Definitions**

Crash Damage – Recommend a suitable definition be provided.

Corrosion – Recommend a suitable definition be provided.

## **Part 4 – Tools**

### **Division 2 – RAW Approvals**

Subdivision A: Section 59 Period of approval JEVIC  
feedback:

The 2-year period of appointment is commercially unviable for businesses given the investment required to lease, own, train staff and maintain suitable business premises. The period of appointment for a RAWS also seems inconsistent with the Period of approval for Testing Facilities and Type Approvals. The Period of approval is recommended to be 5 years.

### **Division 4 – AVV Approvals**

Subdivision A: Section 88 Grant of approval 2d JEVIC  
feedback:

The 2-year period of appointment is commercially unviable for businesses given the investment required to lease, own, train staff and maintain suitable business premises. The period of appointment for an AVV is inconsistent with Period of approval for Testing Facilities and Type Approvals. The Period of approval is recommended to be 5 years.

### **Division 4 – Conditions of applying to AVV approvals**

Subdivision B: Section 91 Conditions about conduct of verifications.2b ii JEVIC  
feedback:

Crash damage and corrosion require clear definitions and examples to ensure the quality of inspections / verifications are consistent.

The investment required to become an AVV is assumed to be significant. Therefore, more detailed information and data from DIRD on forecasted volumes and modelling within the new SEVS criteria and thresholds is requested.

**ENDS**

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