

Submission 82 – RVS Legislation Consultation

To Whom it may concern,

Please see below our comments/questions on the proposed RVSA draft legislation and the Cost Recovery Implementation Statement (CRIS). The comments are in no particular order.

Road Vehicle Standards Act (RVSA) drafts

1. DIRD will need to implement a secure authorisation system for use of Model Reports ie, preventing unauthorised use, otherwise Industry will not take the commercial risk to adopt Model Reports.
2. We seek confirmation that the existing avenue for individual IPA applications will still be available even if Model Reports are adopted? This appears to be the case given that the CRIS (refer below) is proposing different charging levels for the use or non-use of Model Reports.
3. There needs to be a mechanism for amending RAV data if it has been entered in error.
4. Why are AVV's limited to corporations; individuals appear to be excluded? This appears to be discriminatory.
5. Why has a threshold of 4 trailers per year been established for small trailer manufacturers before they need an IPA? This will severely disadvantage smaller manufacturers who build only marginally more than 4 trailers as they will find it difficult to absorb the costs of the IPA compliance over relatively low volumes.
6. The removal of the need for N category vehicles to fit IPA plates will force the manufacturers to fit alternative plates with similar information – which is essential for in-service operation particularly where vehicles are used in combinations. We would support a review of the information required on plates to better provide information for use in the field.
7. We support IPA plates being retained for heavy trailers. We would support a review of the information required on plates to better provide information for use in the field.
8. We question the need for renewal of approvals if there is sufficient evidence that an approval is still in use eg, via variations or amendments.
9. If the renewal process is adopted, will variations or amendments to approvals re-set the 5 year clock? We believe the 5 year clock should be re-set on the basis that the variations or amendments are evidence of the continued use of an approval.
10. Will approvals be lapsed or withdrawn if they are not renewed after 5 years? In other words, can an approval be re-instated after the 5 year period.
11. Will current approval holders be charged to re-establish existing approvals under the RVSA? If so, what is the justification given that the evidence has already been assessed previously.
12. Will existing IPA, SARN & CRN numbers be retained under the RVSA?
13. If the answer to question 12 is NO, have the implications of such a decision been fully considered?
14. We would suggest that the implementation of the RVSA and the new ADR 35/06 and ADR 38/05 should be aligned to reduce the cost burden to the Industry. It would also assist DIRD to cope with the volume of work involved, which historically has created some difficult challenges for the Department.

Cost Recovery Implementation Statement (CRIS)

15. It is noted that use of the services provided by DIRD are mandatory for manufacturers seeking IPA's. In other words, it is the Government that has imposed the regulatory regime on the Industry.
16. Will the increase in charges, compared with the charges under the current MVSA, be offset by a corresponding reduction in taxes or other reductions for the Industry.
17. How are the % increases in charges justified. For example, a Trailer IPA without Model Report, which is the same as the current situation, will increase between 650% & 900% from the MVSA charges.
18. In relation to item 17 above, we question what cost model has been used to derive these charges and whether any improvements in DIRD efficiencies have been factored into the calculations?
19. The increases in charges will disadvantage the smaller trailer manufacturers.
20. The RAV charge per trailer will not be offset by a corresponding reduction in IPA plates costs as it will be for motor vehicles. Trailers will still be required to fit IPA plates – which we support due to the critical information contain therein.
21. Will renewals of approvals incur the same charges as the initial charges?

If you would like to discuss any of these comments/questions, please let me know.

Regards,
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