



Concessional RAV entry approval holder's guide to voluntary vehicle recalls

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This guide helps Concessional RAV Entry (CRE) approval holders who supply vehicles in trade or commerce understand how to recall a road vehicle. It explains approval holders' recall responsibilities, and the department's role in facilitating and monitoring a recall of supplied vehicles to rectify a non-compliance or a defect that may cause a safety hazard.

Scope of this guidance

The guide sets out the department's position on the responsibility of suppliers of CRE vehicles when voluntary recall action may be needed to rectify a safety issue or non-compliance in a supplied road vehicle.

The guide should be read in conjunction with, and subject to, the [Recalls policy](#). Its purpose is to clarify the roles, responsibilities and specific conditions that apply when recalling vehicles supplied through a concessional pathway.

The Recalls policy addresses recalls for CRE approval holders in section 1.3.3 – Concessional vehicles. This guide provides a detailed explanation of that section and highlights other key aspects of recalls that are relevant to CRE approval holders.

Background

For a background to recalls generally, refer to the section in the Introduction to the [Recalls policy](#). Some of that information is duplicated or clarified here.

This guide explains recall obligations regarding vehicles supplied in trade or commerce via the concessional pathway under the *Road Vehicle Standards Act 2018* (RVSA) and the Road Vehicle Standards Rules 2019 (the Rules). The RVSA, the Rules and other related legislation are collectively referred to as the Road Vehicle Standards legislation.

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Chapter 1: Definitions explained

Definitions used throughout the policy and guide are in the [Recalls policy](#) section 1.1 - Definitions. The additional definitions and explanations below repeat or clarify some of those in the Recalls policy but are not intended to modify or replace them.

1.1 Who is a CRE approval holder?

A person or entity who is issued an approval to enter a specific vehicle or set of similar vehicles on the RAV via a concessional RAV entry pathway is the approval holder. The approval will have the designation 'CRE-XXXXXX' and it will note the specific Vehicle Identification Number or Numbers (VINs) that are to be entered on the RAV.

The conditions of a CRE approval contain a reminder that approval holders have obligations related to vehicle recalls. CRE approval holders are considered suppliers with recall obligations. Please see the next point about who is a vehicle supplier.

1.2 Who is a vehicle supplier with recall obligations?

A person or entity who imports a vehicle and provides it to the Australian market in trade or commerce is considered to be a vehicle supplier with recall obligations under the Road Vehicle Standards legislation.

The phrase 'in trade or commerce' means activities carried on in the course of a supplier's or manufacturer's business or professional activity, including not-for-profit business or activity.

Vehicle suppliers have voluntary recall obligations and can be subject to a compulsory recall notice under the Road Vehicle Standards legislation.

An approval holder is expected to be aware of the conditions of their approval and of their obligation to recall vehicles if they were supplied in trade or commerce. The obligation applies even if an agent acted on their behalf when importing the vehicle.

It is important to note that as the CRE approval holder, you are the vehicle's supplier and responsible for recalls on that vehicle. Even if the vehicle's original manufacturer has an Australian presence, they did not supply that vehicle to the Australian market. They may not honour warranties and may refuse to perform recalls on vehicles they did not supply.

1.3 Clarification - What if I imported a single vehicle for private use?

When a vehicle is imported for private use, the repair of any defects is the responsibility of the importer or current owner of the vehicle. Original manufacturers and their authorised local suppliers may not honour warranties or perform recalls where vehicles were first supplied to an overseas market.

1.4 What is a Model Report?

A Model Report is a document setting out how a particular make, model, variant(s) or build range of a vehicle may be modified or manufactured to meet the standards that apply to it, given its vehicle category and age. Anyone with the appropriate skills, or access to the appropriate skills, can develop a Model Report.

People can develop their own Model Report or enter into a commercial arrangement with the owner of an approved Model Report for access to all or part of that Model Report.

Model Report owners can sell or lease their Model Reports under commercial arrangements.

The department publishes a [list of approved Model Reports](#) and the contact details of the owner on ROVER (unless the owner has requested the details not be published).

All Model Reports must be approved by the department before they can be used and must be kept current to reflect changes in vehicle specification over time. For more information about Model Reports, visit the [Model Reports page on the department's website](#).

1.5 What is a 'voluntary recall'?

A supplier is taken to have conducted a voluntary recall when they recall a road vehicle because it:

- will or may cause injury, or that a reasonably foreseeable use (including a misuse) of the vehicle will or may cause injury
- does not, or it is likely that it does not, comply with applicable standards, including the national road vehicle standards, applicable standards determined by the Minister under subsection 89(2) of the Rules, or standards made under section 7 of the *Motor Vehicle Standards Act 1989*.

'Recall action' (taking action to recall a road vehicle) is described in the [Recalls policy](#), section 1.1.4 – What is voluntary recall action?

The recall action is 'voluntary' in that it is initiated by a supplier or manufacturer in response to a problem that they have identified or has been brought to their attention. It is the responsibility of suppliers and manufacturers to provide safe and compliant vehicles to market, and therefore also their responsibility to fix safety or non-compliance issues when they are discovered. If vehicles have been provided to market already, fixing them requires a recall.

Importantly, the word 'voluntary' is not intended to suggest that a Supplier may choose not to remove or rectify vehicles or components that may cause injury. A voluntary recall is the natural response to the need to fix an identified pre-existing problem when the vehicles are no longer in a supplier's possession. Deciding not to fix an identified problem could lead to accidents, injury or even death.

Sections 211 and 212 of the Rules provide the legal requirements for the voluntary recall of a road vehicle in Australia. Voluntary recalls are explained more fully in Chapter 2 of the [Recalls policy](#).

Suppliers please note: The above is distinct from the requirement to ensure all outstanding recalls from the vehicle's source market have been completed. Outstanding source market recalls must be completed before a vehicle can be fully complied and delivered to the customer. You should not deliver a vehicle to a customer if there is an existing recall, until the issue has been rectified.

Chapter 2: Roles and responsibilities

In addition to the roles and responsibilities outlined in Chapter 1, section 1.3 of the [Recalls policy](#), the following are specific to the context of vehicles supplied through a CRE approval. They add to, repeat and clarify some of the information found in the policy but are not intended to replace them.

2.1 The department

2.1.1 The department may inform suppliers of a non-compliance or potential safety issue

If the department becomes aware of a non-compliance or potential safety issue in a road vehicle, we may contact the approval holder to inform them of the risks and their obligations around voluntary recalls. The advice we provide will include details of the potential safety issue or how the vehicle fails to comply with the national standards.

A reference to any variation of an approved Model Report may be used to support the advice.

2.1.2 When and how the department will inform suppliers

The department will inform suppliers under various circumstances when:

- vehicles have been supplied using a Model Report that is then updated with changes to correct a defect or non-compliance. The defect or non-compliance may be present in the vehicles already supplied. Vehicles may need to be recalled and rectified in line with the new work instructions in the updated model report
- there is a new recall in the domestic market the vehicle was originally sourced from that might cause a safety or non-compliance issue in Australia.
- we identify a systemic issue that will or may cause an injury if not fixed. The risk will need to be assessed by suppliers, and vehicles may need to be recalled to fix the issue and mitigate the risk effectively.

2.1.3 Publishing the recall

The department publishes details of each recall on our dedicated [recalls website](#). We will reach out to you to discuss and agree on wording for the published recall.

2.1.4 Monitoring the recall

After the recall has been published, the department will monitor it through to completion. This ensures that suppliers effectively rectify unsafe vehicles or remove them from the road. To do this, the department will conduct a risk assessment and assign a priority and benchmark to the recall within 7 days of it being published. The benchmark is used to give an indication to suppliers of the time the department expects the recall to take. Suppliers will be advised about the priority and benchmark in writing.

The department will contact suppliers who fail to report rectification rates or do not meet benchmarks. For a full discussion of the department's risk assessment and benchmarks, check the [Recalls policy](#) section 2.6 – Monitoring voluntary recalls.

2.2 The supplier

Suppliers have an obligation to ensure that any vehicle they supply is safe and complied with the national standards at the time when the vehicle was provided to the Australian market. When a supplier becomes aware of a potential safety issue or non-compliance, they must consider if a recall is required to address the issue.

If a recall is required, then the supplier must notify the department and develop a detailed strategy to communicate with vehicle owners and complete the recall. The following essential actions and basic considerations will help suppliers make an effective communication and rectification strategy. The roles and responsibilities of suppliers are described in more detail in section 1.3 of the [Recalls policy](#).

2.2.1 What you must do once you decide to do a recall

- **Advise the department that you are taking recall action.** Even if the department informed you about the problem, you must advise the department you are taking recall action through the ROVER portal.
- Provide the department with a list of affected vehicles (a VIN list).
- Make a strategy for the recall. Use the considerations in the next section and refer to Chapter 3 of the recalls policy – 'What is a recall strategy and why is it important?'
- Contact the vehicle owners advising them of the recall. This is usually done in writing. A reminder should be sent after 90 days. You can use other means to contact them if available.
- Arrange for the owner to present the vehicle to a Registered Automotive Workshop (RAW) for the work to be conducted.

- Report monthly to the department the total number affected (all vehicles involved), how many have been fixed (rectified) and how many are outstanding. Progress reports are also mentioned in section 2.2.4 – ‘Progress reports’ and 2.1.4 – ‘Monitoring the recall’ in this guide.

2.2.2 Important considerations to help suppliers be prepared when doing a recall

When a supplier discovers an issue with a vehicle they imported, they should prepare for a recall in the following ways:

- **Establish what the issue is and how can it be rectified.**
If the problem is addressed by updates to a Model Report, there will be additional work instructions in the updated Model Report. Otherwise, decide what needs to be done to fix the problem or seek technical advice from a RAW. The RAW can consider what additional work is required for the vehicle to be made safe, or to comply with the national standards. You will need to provide details of the problem, what danger the problem presents, and how you intend to fix the problem when you submit the recall in ROVER.
- **Always ensure that you or the RAW you engage are using the latest version of the model report.**
There may be changes to work instructions that will help you. You can do this yourself by contacting the Model Report author, or work with the RAW who modified the vehicle for compliance.
- **Identify the vehicles that are affected.**
The department might have given you advice about what vehicles are affected, or you might have to establish this from your records. You should record the affected vehicles as a list of VINs. You will need this list when you submit the recall in ROVER.
- **Is the vehicle still in your possession?**
A recall is not required if the vehicle has not been sold or delivered to a third party in trade or commerce, but repairs will still need to be done and should be done before the vehicle is delivered.
- **If you have sold the vehicles to customers and they have been delivered, identify the customers.**
Use your records to match the list of VINs with the customers you sold them to.
- **Form a strategy for communicating with vehicle owners.**
Inform them about the work that is needed. Draft a letter or email to send to the customers that tells them about it and how to contact you.
- **Make plans for a RAW to inspect each vehicle and do the work as needed.**
This can be the RAW that did the original compliance work or any other RAW with access to the up-to-date model report, compliance or safety information. You should contact the RAW to discuss this.
- **Keep records of which vehicles are fixed and what work was completed to fix them.**
Use the list of VINs you made to record which vehicles have been fixed so you can keep track and report to the department through ROVER.

Further details about how to conduct a recall are in the [Recalls policy](#) Chapter 2: Voluntary recalls.

2.2.3 Authority to act

Suppliers must ensure an appropriate member of their organisation has authority to act on behalf of the CRE approval holder in [ROVER](#). It might be necessary to establish authority to act for the first time if, for example, you have used an agent or RAW to manage importation and not had interaction with the approval before.

Authority to act is required to submit a recall and lodge reports relating to the recall. The authority to act feature in [ROVER](#) allows suppliers to set access levels and ROVER functions for each person in their organisation. Please refer to the published guide on [Authority to act](#) for details and ensure the ROVER function access for **recalls** box is ticked when submitting.

2.2.4 Progress reports

Suppliers of CRE approved vehicles conducting a voluntary recall are expected to provide the department with regular progress reports in the same manner as any supplier conducting a recall. Progress reporting is covered in the [Recalls policy](#) section 4.1.

Further information

For further information, please visit the [department's website](#) or submit an online enquiry through the [contact us](#) page.

Quick links

- [Supplier's guide to vehicle recalls](#)
- [Vehicle Recalls policy](#)
- [ROVER](#)
- [Vehicle Recalls Website](#)
- [Guidance for suppliers on conducting a vehicle recall | Vehicle Recalls](#)
- [Resources \(Factsheets, posters and fliers\) | Vehicle Recalls](#)
- [ROVER guide: Multi-level authority to act](#)
- [ROVER guide: How to upload multiple recall reports using the bulk report template](#)
- [ROVER template: VINs under recall](#)

Document Control

Refer to the following table for the approver and latest version of this document.

| Version | Release date | Approver | Reason for update |
|---------|--------------|--------------|------------------------------|
| 1.0 | 25/06/2026 | David Morton | Initial release of document. |