



# Guidance note

## Adding a vehicle manufactured and/or imported under the MVSA to the Register of Approved Vehicles

November 2021

This Guidance note **only** applies to vehicles manufactured and/or imported by an identification plate approval (IPA) holder that has opted-in the specific IPA to a vehicle type approval.

Once an entity converts their IPA to a vehicle type approval by opting-in to the *Road Vehicle Standards Act 2018* (RVSA), the entity's IPA ceases to be in force and they can no longer affix identification plates to vehicles.

Additionally, with the end of the *Road Vehicle Standards (Consequential and Transitional Provisions) Act 2018* on 30 June 2022, it will be an offence to provide a vehicle that is not on the Register of Approved Vehicles (RAV).

These issues affect vehicles that have been manufactured and/or imported under the IPA, and are either:

1. not plated by the date the entity opts-in to the RVSA, or
2. plated but not provided to a customer by 30 June 2022.

### **What are the RVS requirements for vehicle type approval holders with vehicle stock already manufactured and/or imported under their IPA?**

For vehicles that were manufactured and/or imported under an IPA before the entity transitioned to a vehicle type approval, section 9 of the *Road Vehicle Standards Rules 2019* (the Rules) allows those vehicles to be entered on the RAV provided the approval holder meets the pre-requisite conditions outlined below.

#### **Pre-requisite conditions**

- The approval holder:
  - manufactured the vehicle in accordance with their IPA, or
  - imported a vehicle under a valid import approval (including blanket approval) that allowed them to take delivery of IPA plated vehicles.
- The approval holder elected to 'opt-in' and transition the applicable IPA to a vehicle type approval under the Road Vehicle Standards (RVS) framework and paid the \$20 application fee before 1 January 2022, using the department's online application system - ROVER.
- When the vehicles are entered on the RAV, the vehicles comply with applicable national road vehicle standards, as set out in the vehicle type approval.

- The build date of the vehicles is irrelevant to this requirement of the type approval pathway (see paragraph 15(d) of the Rules).

Please note: It is the responsibility of the vehicle type approval holder to check whether there have been any changes to the applicable national road vehicle standards between when vehicles were manufactured and/or imported under MVSA approvals and when the approval holder intends to add the vehicles to the RAV.

For example, national road vehicle standards were updated on 1 November 2021, changing standards about safety features in some passenger vehicles and motorcycles. A vehicle that was fitted with an identification plate in October 2021 that does not comply with the updated standards cannot then be entered to the RAV after 1 November 2021, as it will not comply with the updated standards.

Where a vehicle was validly fitted with an IPA identification plate (either before opt-in or where the IPA holder does not intend to opt-in the specific IPA applicable to the vehicle), there is no requirement to add the vehicle to the RAV. Any such vehicles may continue to be supplied to the market until 30 June 2022.

Further guidance relating to IPA plated vehicles that do not comply with a VTA will be provided in December 2021.

#### **What about the conditions of the blanket approval?**

The department notes that blanket approvals contain the following condition:

*The importer will do all things reasonable and necessary to ensure that, when the vehicle is supplied to the market, it ... still has an identification plate.*

For the purposes of regulatory oversight of blanket approval conditions, and where the pre-requisite conditions listed above exist, the department will consider entering a vehicle onto the RAV to be the equivalent of ensuring a vehicle 'still has an identification plate' upon supply.

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