

Department of Infrastructure, Transport, Regional Development, Communications and the Arts





# Tips and quick reference guide for low ATM trailers

Collated information, tips and references relating to low ATM trailers under the Road Vehicle Standards (RVS) laws

### What do I need to know to import or manufacture a trailer?

The rules relating to road vehicles, including trailers, whether imported or manufactured in Australia, have changed.

From 1 July 2023, to register a trailer with your state or territory authority, or sell to a consumer in Australia, the vehicle and compliance details must be entered on the Register of Approved Vehicles (RAV).

The RAV is a publicly searchable database of vehicles that have met the requirements of the Road Vehicles Standards (RVS) laws and been approved for provision to the Australian market.

## How do I get a trailer on the RAV?

You will need to apply for the relevant approval type, but importantly you will need to consider your business model and consider whether you will be:

- importing the trailer/s from an overseas based manufacturer, or
- · manufacturing the trailer/s with full control over the design, componentry and production in Australia, and
- if the aggregate trailer mass (ATM)<sup>1</sup> is 4.5 tonnes or less (low ATM trailer if over 4.5 tonnes ATM, please refer to the high ATM trailer guidance), and
- the quantity of trailers you intend to import or manufacture in a 12-month period.



You must hold an approval that is in force and granted under the RVS laws to import a trailer, the make and model of which is covered by the approval.

## If you import or manufacture 4 or less trailers in a 12-month period

To add 4 or fewer trailers to the RAV in a 12-month period you can apply for a concessional RAV entry approval, noting this process allows for a single vehicle per application.

<sup>&</sup>lt;sup>1</sup> ATM = the trailer's total mass when carrying the maximum load recommended by the manufacturer.

#### Tip 1 - Legal requirement of meeting compliance with the Australian Design Rules (ADRs)

If you **import** the trailer under this pathway then you must ensure the overseas manufacturer has given you confirmation that the trailer complies with the applicable ADRs.

If you have **manufactured** the trailer yourself, you must declare that the trailer complies with the applicable ADRs in accordance with <u>Vehicle Safety Bulletin 1 (VSB1) (Revision 6)</u>.

#### Tip 2 - The importance of VSB 1 (Revision 6)

VSB 1 (Revision 6) is the updated version of information to assist low ATM trailer manufacturers to understand the requirements that must be met in order to be granted an approval for the most common trailer types. The bulletin breaks down each of the applicable ADRs and details the methods to meet requirements, and focuses on areas where non-compliance is more often detected, such as lighting, safety and braking ADRs.

## What does the application process involve?

First, you will need to create an account in **ROVER**, our online applications and approvals portal.

You will also need to set up an authority to act if you are representing the company or person who intends to hold and be responsible for the approval.

#### Tip 3 – The vehicle category codes for trailers are based on the gross trailer mass (GTM)<sup>2</sup>

- TA very light trailer with GTM less than 750kg
- TB light trailer with GTM 750kg less than 3500kg
- TC medium trailer with GTM 3500kg to less than 10000kg.

A low ATM trailer falls into the TA and TB categories, and may also meet the TC category.

## What is the application process for 4 or less trailers?

The application is found under the <u>Single Road Vehicle Approval</u> icon when you log into your ROVER account. You must have the following information ready to apply:

- Applicant details who will hold the approval
- Vehicle details:
  - select the type as trailer
  - confirmation ATM is 4500kg or less
  - make select or specify
  - model free text

<sup>&</sup>lt;sup>2</sup> GTM = the mass transmitted to the ground by the axle/s of the trailer when coupled to a drawing vehicle and carrying its maximum load approximately uniformly distributed over the load bearing area.

- manufacture year (month optional)
- Vehicle Identification Number (VIN) or chassis number, if present
- select YES to be used on a public road
- select the approval kind as a trailer
- provide the tailer type and category and the length, width, height, ATM, GTM, Tare Mass, noting metres and tonnes are the required measurements, and
- photos of the vehicle, VIN and ATM.
- Compliance with applicable ADRs is also required. The application will present you with a list ADRs based on the vehicle details provided. For each ADR you are required to select the extent of compliance.
- If you select substantial compliance rather than full compliance, you will need to hold supporting evidence that the trailer is still safe for use on an Australian public road.
- You must read carefully the acknowledgements and declarations the applicant is signing when submitting the application.
- Fees and charges must be paid at the time of submission to ensure assessment commences.



You should also check with your state or territory registration authority for any additional requirements the vehicle may need to meet.

#### Tip 4 – Extent of compliance

When selecting the extent of compliance for each ADR, you must have, at a minimum, taken account of the design and construction standards in VSB 1 (Revision 6).

#### What if the trailer does not have a VIN?

- If the trailer does not have a VIN, the following options apply:
- If the trailer has a chassis number, you can use that number in the VIN field.
- If there are no numbers on the vehicle, you can enter TBA.
- In both cases ROVER will either generate a new VIN or convert the chassis number into a VIN.
- If the VIN is unrecognisable or does not meet the international standard of a VIN format, ROVER will update the VIN
  so that it can be added to the RAV.

### Approval notification

If the application meets all of the requirements you will be granted a concessional RAV entry approval for the trailer. Please note that during consideration of the application you may receive a request to provide further information related to the application, or to inspect the trailer. This may delay the outcome, but you will receive appropriate emails from ROVER alerting you that have an action you need to respond to in your ROVER account.

If you are granted an approval it will include the number, CRE-XXXXX, which can be used for <u>import, customs and other</u> <u>formalities</u>. The approval may also include conditions that you need to meet before the trailer details can be added to the RAV.

If you are granted the approval and have met all the conditions of the approval, the trailer details will be entered on the RAV by ROVER.

Once you have confirmed the RAV entry – <u>search the VIN is on the RAV</u> – you will be able to seek registration from your state or territory registering authority.



The definition of a road vehicle includes a trailer or other vehicle (including equipment or machinery equipped with wheels) designed to be towed on a public road by a motor vehicle.

## What is the application process for more than 4 trailers?

If you know you need to import or manufacture more than 4 trailers in a 12-month period, or your business model is set up for commercial quantities of trailers, you will need to apply for a road vehicle type approval for low ATM trailers.

If you intend to apply for and hold a road vehicle type approval, there are important eligibility criteria that MUST be met and kept up to date while the approval, if granted, is in force.

#### Tip 5 – How to apply for a vehicle type approval for a low ATM trailer

This <u>video</u> covers each of the steps to complete a vehicle type approval application for a low ATM trailer and assists you to understand how the application process works and what information is expected.

## Before you begin

The application itself is not overly complex, however, preparing all of the supporting information, evidence documentation and compliance demonstration method details is critical for a successful application.

This information must also be kept up to date for the duration of the approval (7 years), unless it is revoked earlier. You must have and be able to support all of the following:

- information demonstrating the trailer complies with the applicable ADRs (noting, in some cases, non-compliance may be permitted if the non-compliance is only in minor and inconsequential respects or the trailer complies to an extent that makes it suitable for use on a public road in Australia e.g. glider trailers with a longer rear overhang), and
- control over all stages of the design, componentry and manufacturing process of the trailer type, or
- if you are not the manufacturer of the trailer, access to information, including information about any changes, relating to the design, componentry and manufacturing process (this can be through contractual or other arrangements directly with the manufacturer), and
- can ensure the design, componentry and manufacturing process will consistently produce the type of trailer (this can be through a <u>quality management system (QMS)</u>, ISO accreditation or a conformity of production, and
- · can arrange for an inspection of the premises where the trailer or componentry for the trailer is manufactured, and
- can access and provide original and subsequent versions of supporting information, and
- can ensure the supporting information for the approval is kept up-to-date and can provide any required information to the department for the period the approval is in force and for a further 7 years after it expires, and
- will comply with each of the standards and any specified conditions that the vehicle type approval will be subject to.

### What is expected if I am not the manufacturer?

If you are not the manufacturer, you will need to upload a copy of the commercial agreement allowing you access to information about the design, componentry and manufacturing process for the road vehicle. You will also need to upload a copy of the commercial agreement, contract or written advice confirming your agreed level of access with the manufacturer. The features the department will expect in a written agreement to access the required information include:

- · the trailer that the vehicle type approval will cover
- the relevant parties to the agreement
- confirmation that the trailer will be manufactured by the other entity
- confirmation that you have access to the design and manufacturing information, and the inclusion of design and manufacture change management oversight
- confirmation that you have access to information and can arrange physical inspection of the design, componentry and
  manufacturing processes to support the approval holder's record keeping and to satisfy requests for information or
  inspection by a departmental inspector
- confirmation that you have access to QMS documentation, engineering documentation, results of testing, change
  management processes and procedures that demonstrate (and ensure ongoing) compliance with the applicable ADRs,
- confirmation that you have access to documentation demonstrating that the trailer will consistently comply with the applicable ADRs.

### What details must I include in the application?

- The application will require you to complete, select or upload the following:
- the vehicle category of the trailer, TA, TB or TC
- confirmation the ATM is 4.5 tonnes or less
- make and model names for the same category
- location details of design and manufacture facilities
- · the type of relationship you have with the manufacturer of the trailer
- the level of control you have over the design, componentry and manufacture of the trailer
- · document reference to QMS or ISO accreditation, and
- the extent of compliance against each of the applicable ADRs, noting that while compliance information forms do not
  need to be completed in the application, you must have conducted relevant testing or have approved component
  type approvals to cover the componentry or other relevant method of demonstrating compliance with ADRs.

#### Tip 6 – Using component type approvals

Ensure the component you wish to purchase is actually an approved component under the RVS legislation and remains in force. If in any doubt, you can check by using the contact details of the component type approval holder – these are included in the published list of approvals in ROVER.

# How do I know if the trailer complies with the ADRs?

You will need to identify the <u>ADRs</u> that are applicable to the trailer you are seeking approval for. The typical ADRs, which are covered in <u>VSB 1</u> (<u>Revision 6</u>) include:

- 1/00 Reversing Lamps
- 6/00 Direction Indicators
- 13/00 Installation of Lighting and Light Signalling Devices
- 23/03 Passenger Car Tyres
- 38/05 Trailer Braking Systems
- 42/05 General Safety Requirements
- 43/04 Vehicle Configuration and Dimensions
- 44/02 Specific Purpose Vehicles
- 45/01 Lighting and Light Signalling Devices not covered by ECE Regulations
- 47/00 Retro reflectors
- 48/00 Devices for Illumination of Rear Registration Plates
- 49/00 Front and Rear Position (Side) Lamps, Stop Lamps and End Outline Marker Lamps
- 51/00 Filament Lamps
- 61/03 Vehicle Marking
- 62/02 Mechanical Connections Between Vehicles
- 74/00 Side Marker Lamps
- 91/00 Rear Underrun Impact Protection
- 92/00 External Projections
- 95/00 Installation of Tyres
- 96/00 Commercial Vehicles Tyres.

This is why VSB 1 (Revision 6) is so important. Contact a qualified mechanic or automotive engineer if you need expert advice.

### Submitting your application

When you have completed all of the requirements in the application, you will need to make certain acknowledgements and declarations about the information provided and complying with all of the conditions of the approval, if granted.

At the time of submission you will be required to pay the <u>application fee</u> before the assessment commences.

#### Tip 7 - Record keeping

The record keeping condition of the approval, if granted, requires all information and documentation relevant to the application is referenced and kept up to date.

## Approval notification

If the application meets all of the requirements you will be granted a road vehicle type approval for the low ATM trailer. Please note that during consideration of the application you may receive a request to provide further information related

to the application, or to inspect the trailer. This may delay the outcome, but you will receive appropriate emails from ROVER alerting you that have an action you need to respond to in your ROVER account.

If you are granted an approval it will include the number, VTA-X6XXX, which can be used for <u>import and customs</u> <u>formalities</u>. The approval may also include additional or specified conditions that you need to meet before the trailer details can be submitted under your RAV ID on to the RAV.

#### **RAV** submission

As a vehicle type approval holder you will be responsible for <u>submitting the trailer details on the RAV</u>. You can authorise someone to do this on your behalf by logging into ROVER and using the Authorities to Act icon, or if you are an individual, use the Profile icon.

As a vehicle type approval holder you may also <u>seek written agreement</u> to be invoiced on a monthly basis for the RAV levy charges for the vehicles you add to the RAV.

#### What if the trailer does not have a VIN?

Road vehicle type approval holders are responsible for ensuring each trailer under the approval has a unique <u>VIN</u>. This is also the prime element when submitting details on to the RAV.

If the manufacturer is based overseas the VIN should be issued with the vehicle. In some cases, you may need to seek the details for issuing your own VINs from the overseas manufacturer or the relevant authority in the overseas jurisdiction where the vehicle is manufactured.

The National Exchange of Vehicle and Driver Information System (NEVDIS) is the authority in Australia responsible for assisting Australian based vehicle manufacturers only to issue VINs.

# What are the responsibilities of an approval holder under RVS laws?

Where you hold a concessional RAV entry approval or a road vehicle type approval for your low ATM trailer/s, there are important responsibilities that all approval holders must comply with.

Firstly, when making the application the applicant/approval holder makes acknowledgements and declarations that, if found to be false or misleading, can result in penalties. The information and supporting documentation submitted with your application is also critical to being granted an approval and, if found to be false or misleading, can also result in penalties.

Secondly, when granted the approval there will be common and some additional or specified conditions on the approval that must be complied with. If you are found to be in breach of a condition of your approval, there may be penalties applied.

The <u>RVS Compliance and Enforcement approach</u> includes responses appropriate to the type of non-compliance or risk. The Compliance and Enforcement Strategy includes a focus on the accuracy and ongoing compliance of approvals for low ATM trailers.

#### More information

For further information, please visit the department's website or submit an online enquiry.