



Australian Government

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



# Road Vehicle Standards

## Tips: Common errors in second stage of manufacture vehicle type approval applications

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Recent applications for second stage of manufacture vehicle type approvals have included some common errors. Read our tips on how to avoid them and reduce the possibility of us requesting further information or requiring a correction.

### **Incomplete descriptions of what is being modified**

In the remarks section of the Road Vehicle Descriptor (RVD) you need to include information about what modifications are being performed, the vehicle being modified, and identify the first stage approval version and RVD variant name/s. If you are referring to an RVCS RVD, also include the RVD document reference. This information can be updated/maintained in a future variation where required.

Remember, assessors and state and territory registration authorities use the vehicle modification details when looking at the application or the vehicle.

### **Different types of information showing compliance on the same compliance information (CI) form**

You should not include different types of information showing compliance on the same compliance information (CI) form. For example, if you use ECE approvals for some lights and the component type approval option for others, these need to be completed on separate CI forms. Do not use the comments section of the CI form.

### **Be aware of differing side indicator requirements**

Vehicles changing categories or dimensions may need to be fitted with a different category side indicator. This will need to be identified in both ADR 6/00 and ADR 13/00. Category 5 indicators must be removed or rendered inoperable.

### **Not identifying the extent of compliance for all ADRs**

Ensure the extent of compliance is identified. If the ADR is not applicable, indicate why:

- the vehicle is not considered a new model because the first stage vehicle was not a new model for the relevant ADR. This ADR will become applicable if there is an 'all vehicles' date identified in the ADR
- if the ADR is exempt
- the vehicle is out of scope of the ADR
- the vehicle is not fitted with items in the ADR
- the vehicle is compliant with a later version of the ADR.

**Note:** You should not refer to Administrator's Circular 0-4-6, as it only applies to the Motor Vehicle Standards legislation.

### **Not selecting substantial compliance when the vehicle does not fully comply**

If the vehicle does not fully comply with the requirement of the ADR, you need to make this clear by selecting ‘Substantial compliance – minor and inconsequential’ and provide information about the non-compliance.

## **Errors entering ADR information on CI forms**

We have identified some common errors people make when completing CI forms for ADRs. The ADRs and the errors are listed below.

### **ADR 18/03—Instrumentation**

*Incorrect type size information* – You must be accurate with tyre size modifications. Where tyres have increased in size, you need to provide new information. Compliance cannot be based on the first stage vehicle.

### **ADR 30—Emissions**

*Claiming full compliance when the vehicle is not compliant* – You cannot claim full compliance using the first stage vehicle type approval where the first stage vehicle is not compliant to this ADR.

### **ADR 35/06**

*Using a prior acceptable rule for ADR 35/06 braking requirements* – When an ADR is mandatory for all vehicles, the claim of compliance must be shown for the applicable ADR. Testing may be performed to a previous version of the ADR where identified as a prior acceptable rule. The extent of compliance must be identified correctly (‘Full Compliance’ to the applicable version of the ADR).

### **ADR 35/06—Commercial Vehicle Brake Systems**

*Brake testing* – This needs to be performed on the worst-case vehicle, vehicle mass, wheelbase and tyre size need to be considered. Guidance for selecting a test vehicle can be found in Circular 35/06-2-1.

### **ADR 42**

*ADR 42/...—Evidence to 42/... not provided* – If the SSM modifications on your vehicle changes aspects of compliance to this ADR, full compliance information needs to be provided. For example, the documents you hold to show compliance, not using the first stage approval.

### **ADR 42/05**

*Certifying full compliance with ADR 42/05* – As per Clause 3.9, vehicles certified to ADR 42/05 must also be certified to:

- ADR 90/...—Steering System
- ADR 92/...—External Projections
- ADR 93/...—Forward Field of View
- ADR 94/...—Audible Warning
- ADR 95/...—Installation of Tyres.

### **ADR 43/04—Vehicle Configuration and Dimensions**

*Compliance information for ADR 43/04 needs to be provided* – As the SSM modifications on this vehicle will change aspects of compliance to this ADR, full compliance information needs to be provided.

### **ADR 61/03—Vehicle Marking**

*The compliance information form for this ADR is often missed.*

### **ADR 83/00—External Noise**

*Changing the type of tyre can affect compliance with the ADR* – You need to justify why the different type of tyre does not affect compliance, this may be supported by a test showing a comparison between 2 tyre types on the same vehicle.

### **ADR 96—Commercial Vehicle Tyres**

*Changing tyres* – If you change the tyres and commercial tyres are fitted, compliance to ADR 96 cannot be claimed using first stage approval.

## **Further information**

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