

KENNA Allison

From: [REDACTED]
Sent: Tuesday, 26 June 2018 5:42 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Attachments: Proposed text for inclusion on RVCS What's New with TMR Input 2018-06-26.docx

Dear AMVCB members

Thanks for providing your comments. I have amended text to include the comments provided .

I would also like to clarify the following issues raised by Peter.

- As GCM is not listed in the RVDs of light vehicles, the Department will use the GVM and Maximum Towing Mass (Braked Trailer) values on light vehicle RVDs to approximate value of GCM assuming 10% coupling load which is a recognised industry practice. This would be further clarified on the RVD form for Light vehicles under Notes section.
- Second stage manufacturers fitting extra axles will have the option to increase GCM as the vehicles after modification generally move into heavy vehicles category (category NB2).

Please note that comments on this close on 28th June 2018.

Regards

[REDACTED]
Director Certification and RAWS
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601
[REDACTED]

From: Anant Z Bellary <Anant.Z.Bellary@tmr.qld.gov.au>
Sent: Tuesday, 26 June 2018 10:49 AM
[REDACTED]

Hello [REDACTED]

Thanks for the opportunity.

We have certain concerns with the proposed text, but our concerns could be addressed with some small changes to the text. I have attached the amending document in which you can find the changes we suggest as tracked changes.

In essence the below text, TMR believes, would be more appropriate and acceptable:

Clarification of Circular 0-4-6 Amendment

This update clarifies clause 10.6 requirements for recently issued Administrator's Circular 0-4-6 (Issue 4, June 2018).

Circular 0-4-6 was amended at Clause 10 to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade.

The guidance provided by the Circular 0-4-6 applies to Light Vehicles that includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

Note that the clarification provided in Clause 10.6 of the revised circular does not contradict with anything in the previous version of the Circular 0-4-6; rather it provides clarity around the certification practice that has been established for some time now. In principle, the revised circular applies to all Identification Plate Approvals (IPAs); however its immediate enforcement will be on new applications and new amendments to existing IPAs.

The Circular's effect on existing IPAs held by the second stage manufacturers will be nil or minimal if (a) the SSM's Road Vehicle Descriptor (RVD) for the particular make/model/variant is based on the first stage manufacturer's RVD that is current and (b) the SSM's particular make/model/variant is distinct from the variants covered by other current RVDs for that SSM approval.

Where the above conditions are met, the existing SSM IPA holders can continue to supply to market vehicles covered by the approved RVDs. In other cases, SSM IPA holders are required to amend their RVDs.

The option of GCM or towing capacity upgrade may be available to consumers in some State/Territory jurisdictions, after the vehicle is supplied to market.

I hope this helps.

Regards

Anant Bellary

Vehicle Standards & Accreditation

Transport & Main Roads

From: [REDACTED]

Sent: Thursday, 21 June 2018 11:28 AM

Subject: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

Importance: High

Dear AMVCB members

Please see the proposed text attached that the Vehicle Safety Standards (VSS) Branch has drafted for inclusion as an update on [RVCS What's New](#).

Please review and provide any comments you may have on this text back to

[REDACTED] (cc'd) **as soon as possible**, and no later than close of business 28 June 2018. Please also let [REDACTED] know as soon as possible if you support the proposed text. VSS is looking to provide an update on [RVCS What's New](#) as soon as is possible.

Regards

[REDACTED]
A/g Section Head
Standards Review and Maintenance
Vehicle Safety Standards | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

W www.infrastructure.gov.au

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Clarification of Circular 0-4-6 Amendment – seeking AMVCB comments

This update clarifies clause 10.6 requirements for recently issued Administrator's Circular 0-4-6 (Issue 4, June 2018).

Circular 0-4-6 was amended to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade under Clause 10.

The guidance provided by the Circular 0-4-6 applies to Light Vehicles that includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

The revised circular applies to new applications and new amendments to existing Identification Plate Approvals (IPAs). The Circular will not affect the existing IPAs held by the second stage manufacturers. Existing IPA holders can continue to supply to the market vehicles covered by the approved Road Vehicle Descriptors (RVDs). This includes vehicles where the approved RVD has variants that exceed the first stage manufacturer's Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating. The second stage manufacturers need to ensure that the current approved RVDs should refer to the current approved RVDs for the first stage manufacturer.

The option of GCM or towing capacity upgrade may be available to consumers in some State/Territory jurisdictions, after the vehicle is supplied to the market.

KENNA Allison

From: [REDACTED] S47F
Sent: Tuesday, 26 June 2018 1:31 PM
To: [REDACTED]
Cc: [REDACTED] S47F and 22
Subject: RE: Changes to Circular 0-4-6 Clause 10.6 - GCM Re-Rating of New Vehicles [SEC=UNCLASSIFIED]

Hi [REDACTED] S22

Thanks for your reply. Will businesses who already hold SSM approvals to carry out GCM upgrades be required to adhere to the amended circular requirements or will these businesses?

We are getting questions from industry around whether this change will only apply to new SSM approvals under 0-4-6 and will not affect those currently holding approvals.

Can you please clarify – I assume it encompasses both current and pending/ new?

Regards

[REDACTED]
 Technical Liaison
 Caravan Industry Association of Australia Ltd

[REDACTED] Section 47F

Websites

Consumer: www.letsocaravanandcamping.com.au

Corporate: www.caravanindustry.com.au



Vision

To lead and champion a robust, compliant & sustainable caravanning & camping industry.



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From: [REDACTED] S22
Sent: Thursday, 21 June 2018 11:37 AM
To: James Field <[REDACTED]>
Cc: S [REDACTED]
Subject: RE: Changes to Circular 0-4-6 Clause 10.6 - GCM Re-Rating of New Vehicles [SEC=UNCLASSIFIED]

This matter was raised by industry as a concern and review of 0-4-6 undertaken in conjunction with State and Territory regulators.

Regards,

From: [REDACTED]
Sent: Tuesday, 19 June 2018 10:41 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Changes to Circular 0-4-6 Clause 10.6 - GCM Re-Rating of New Vehicles

Sciton 47F

Section 22 and 47F

Good morning [REDACTED]

I hope you are both well? We note the recent amendment to Circular 0-4-6, in particular clause 10.6 which now reads ***the towing capacity of a light vehicle expressed as Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating must not exceed the value set by the first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade.***

Are you able to provide a rationale or feedback around why this has been changed by the department?

Look forward to your feedback.

Regards

[REDACTED]
Technical Liaison
Caravan Industry Association of Australia Ltd

[REDACTED]
Section 47F

Websites

Consumer: www.letsgocaravanandcamping.com.au

Corporate: www.caravanindustry.com.au



Vision

To lead and champion a robust, compliant & sustainable caravanning & camping industry.



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KENNA Allison

From: [REDACTED]@tmr.qld.gov.au>
Sent: Tuesday, 26 June 2018 10:49 AM
To: [REDACTED]
Cc:
Subject: RE: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Attachments: Proposed text for inclusion on RVCS What's New with TMR Input 2018-06-26.docx

Hello [REDACTED]

Thanks for the opportunity.

We have certain concerns with the proposed text, but our concerns could be addressed with some small changes to the text. I have attached the amending document in which you can find the changes we suggest as tracked changes.

In essence the below text, TMR believes, would be more appropriate and acceptable:

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Note that the clarification provided in Clause 10.6 of the revised circular does not contradict with anything in the previous version of the Circular 0-4-6; rather it provides clarity around the certification practice that has been established for some time now. In principle, the revised circular applies to all Identification Plate Approvals (IPAs); however its immediate enforcement will be on new applications and new amendments to existing IPAs.

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Where the above conditions are met, the existing SSM IPA holders can continue to supply to market vehicles covered by the approved RVDs. In other cases, SSM IPA holders are required to amend their RVDs.

The option of GCM or towing capacity upgrade may be available to consumers in some State/Territory jurisdictions, after the vehicle is supplied to market.

I hope this helps.

Regards

Vehicle Standards & Accreditation
Transport & Main Roads

From:

Sent: Thursday, 21 June 2018 11:28 AM

To:

Subject: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

Importance: High

Dear AMVCB members

Please see the proposed text attached that the Vehicle Safety Standards (VSS) Branch has drafted for inclusion as an update on [RVCS What's New](#).

Please review and provide any comments you may have on this text back to

(cc'd) **as soon as possible**, and no later than close of business 28 June 2018. Please also let [REDACTED] know as soon as possible if you support the proposed text. VSS is looking to provide an update on [RVCS What's New](#) as soon as is possible.

Regards

A/g Section Head
Standards Review and Maintenance
Vehicle Safety Standards | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

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Clarification of Circular 0-4-6 Amendment – seeking AMVCB comments

This ~~paper update further~~ clarifies clause 10.6 requirements for recently issued Administrator's Circular 0-4-6 (Issue 4, June 2018).

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Circular 0-4-6 was amended at Clause 10.6 to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade ~~under Clause 10~~.

The guidance provided by the Circular 0-4-6 applies to Light Vehicles that includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

Note that the clarification provided in Clause 10.6 of the revised circular does not contradict with anything in the previous version of the Circular 0-4-6; rather it provides clarity around the certification practice that has been established for some time now. In principle, the revised Circular circular applies to all Identification Plate Approvals (IPAs); however its immediate enforcement will be only applies to on new applications and new amendments to existing Identification Plate Approvals (IPAs).

The Circular's will not affect effect on the existing IPAs held by the second stage manufacturers will be nil or minimal if:-

- (a) The SSM's Road Vehicle Descriptor (RVD) for the particular make/model/variant is based on the first stage manufacturer's RVD that is current and
- (b) The SSM's particular make/model/variant is distinct from the variants covered by other current RVDs for that SSM approval

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-Where the above conditions are met, the Existing-existing SSM IPA holders can continue to supply to the market vehicles covered by the approved Road Vehicle Descriptors (RVDs). This includes vehicles where the approved RVD has variants that exceed the first stage manufacturer's Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating. In other cases, SSM IPA holders are required to amend their RVDs.

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The option of GCM or towing capacity upgrade ~~continues to may~~ be available to consumers in some State/Territory jurisdictions, after the vehicle is supply-supplied to the market, through the State/Territory registration authorities where applicable.

KENNA Allison

From: [REDACTED]
Sent: Monday, 25 June 2018 9:15 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

I have concerns about this, as we (STRAs) have previously advised the GCM is not recorded on RVD for light vehicles. The examples with Lovell's is one example.

Which has probably started the circular amendment.

I am also not sure what the department is doing with companies such as six-wheel conversions, who add additional chassis, axles and wheels for new GVM and GCM ratings. According to recent media and news companies like this are well advanced with Amarillo Ute conversions.

[REDACTED]

On 21 Jun 2018, at 11:40 am, [REDACTED] <[\[REDACTED\]@tmr.qld.gov.au](mailto:[REDACTED]@tmr.qld.gov.au)> wrote:

We have reservations about the proposed text. As such, we do not support it. More detailed response will be provided soon.

Regards

[REDACTED]

Vehicle Standards & Accreditation
Transport & Main Roads

From: [REDACTED]
Sent: Thursday, 21 June 2018 11:28 AM

[REDACTED]

Subject: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

Importance: High

Dear AMVCB members

Please see the proposed text attached that the Vehicle Safety Standards (VSS) Branch has drafted for inclusion as an update on [RVCS What's New](#).

Please review and provide any comments you may have on this text back to [REDACTED] (cc'd) as soon as possible, and no later than close of business 28 June 2018. Please also let [REDACTED] know as soon as possible if you support the proposed text. VSS is looking to provide an update on [RVCS What's New](#) as soon as is possible.

Regards

[REDACTED]
A/g Section Head
Standards Review and Maintenance
Vehicle Safety Standards | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED] w www.infrastructure.gov.au

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KENNA Allison

From: [REDACTED]@findlay.net.au>
Sent: Friday, 22 June 2018 2:14 PM
To: [REDACTED]
Subject: RE: Attn: Administrator - Lovells Springs Administrator's Circular 0-4-6 Clarification - URGENT
Attachments: RN180610_01 - Lovells - RVCS 0-4-6 Response - FINAL.pdf
Importance: High

Hi [REDACTED]

Section 22

This is just a follow up to our phone call on 14/6/18.

Is there any written response regarding our letter forthcoming?

You mentioned in the phone call that we would have a written response sometime this week (week End Friday 22/6/18).

Could you please provide an update on this written response.

REGARDS

[REDACTED]
Engineer

R. K. FINDLAY PTY LTD

Consulting Engineers

3/17 Pembury Rd, Minto NSW 2566

(PO Box 1052, Campbelltown NSW 2560)

[REDACTED]
[\[REDACTED\]@findlay.net.au](mailto:[REDACTED]@findlay.net.au)

From: [REDACTED]@findlay.net.au]

Sent: Wednesday, 13 June 2018 12:22 PM

To: 'rvcs@dotars.gov.au'

Subject: Attn: Administrator - Lovells Springs Administrator's Circular 0-4-6 Clarification - URGENT

Importance: High

To The Administrator,

Please find attached a response letter from R. K. Findlay Consulting Engineers (RKF) on behalf of Lovells Springs (Lovells) addressing the recent publication of Administrator's Circular 0-4-6 Issue 4.

This letter outlines the concerns which Lovells have in regards to the addition of Section 10 in 0-4-6.

Given the impact of Circular 0-4-6 Issue 4 on Lovells' business, we would appreciate a prompt response to the requests for clarifications set out in this letter.

Of urgency is a response to the questions raised in Item 1 of the attached letter. We seek an immediate answer such that Lovells can advise their clients on this matter.

We look forward to responses to the other items raised in this letter as soon as possible.

REGARDS

[REDACTED]
Engineer

R. K. FINDLAY PTY LTD

Consulting Engineers

3/17 Pembury Rd, Minto NSW 2566

(PO Box 1052, Campbelltown NSW 2560)

[REDACTED]
[REDACTED]

KENNA Allison

From: [REDACTED]
Sent: Thursday, 21 June 2018 3:18 PM
To: [REDACTED]
Subject: RE: Circular 0 - 4 - 6 Clarification [SEC=UNCLASSIFIED]

S22

[REDACTED]

We have had a fair bit of feedback on this issue and a reviewing it with a view to provide more detailed guidance. One of the matters under consideration is approvals already issued and the propriety of the figures used.

Regards,

[REDACTED]

From: [REDACTED]
Sent: Wednesday, 20 June 2018 1:49 PM
 [REDACTED]
Cc: [REDACTED]
Subject: Circular 0 - 4 - 6 Clarification

S22

Good Afternoon Gentlemen,

I write in relation to the recently released Administrators Circular 0 - 4 - 6 [Issue 4 June 2018] relating to Certification of Vehicles Which Have Undergone a Second-Stage-of-Manufacture, and request clarification.

In particular, I am concerned about the condition at Clause 10.6 which prohibits the increase in Gross Combination Mass [GCM].

I can understand the intent of the revision, as that has also been of my concern when observing what some SSM providers are presenting, particularly in relation to GVM upgrades on 4x4 only vehicles. Also of concern is where a 4x4 is converted to a 6x4 with increased GVM and also retaining the original towing capacity without any appropriate strengthening of the Rear Drive Axle or Differential.

My client, [REDACTED] converts existing 4x4 vehicles into either 6x4 or 6x6 variants. This process requires extensive modification and strengthening to the rear Chassis Frame in order to support the unique Suspension system to carry the additional payload, and also provide adequate strength to retain the original towing rating.

The Suspension system, be it on either a "light vehicle" or "heavy vehicle" variant utilizes either Coil or air suspension on a highly articulated 50/50 load-share system incorporating OEM Axles. Although the original Axle ratings are not exceeded, the Rear Axles are reinforced to adequately accommodate the revised payload and GCM. Mechanical testing of the Axles has shown that the strength of the modified Axles, even when the Wheel Track is widened, is significantly superior to the original.

The design of the articulated suspension incorporates a "rear steer" element which assists in vehicle stability, particularly when negotiating corners, and as well as during a "lane change procedure". And this would assist in effective operation of the ESC system, and provide the required tow vehicle stability for the retained towing capacity.

Further, on the [REDACTED] nominated GCM, an analysis is carried out of both the Chassis Frame and the complete drive train from Engine through to Differential to ensure that relevant component capacities are not excessive.

Both [REDACTED] and myself are available to discuss this matter in greater detail.

Kind Regards,

[REDACTED]
Consulting Engineer
All Vehicle Compliance Pty Ltd
Brisbane
[REDACTED]
[REDACTED]

S22

KENNA Allison

From: [REDACTED]
Sent: Thursday, 21 June 2018 3:03 PM
To: [REDACTED]
Subject: RE: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

[REDACTED]

Does it need a disclaimer that there may be circumstances where GCM will be upgraded, such as additional axes?

Thanks,

[REDACTED]

From: S [REDACTED]
Sent: Thursday, 21 June 2018 11:43 AM

[REDACTED]

Subject: FW: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Importance: High

FYI

From: [REDACTED]
Sent: Thursday, 21 June 2018 11:28 AM

[REDACTED]

Subject: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Importance: High

Dear AMVCB members

Please see the proposed text attached that the Vehicle Safety Standards (VSS) Branch has drafted for inclusion as an update on [RVCS What's New](#).

Please review and provide any comments you may have on this text back to

[REDACTED] (cc'd) as soon as possible, and no later than close of business 28 June 2018. Please also let [REDACTED] know as soon as possible if you support the proposed text. VSS is looking to provide an update on [RVCS What's New](#) as soon as is possible.

Regards

[REDACTED]

A/g Section Head
Standards Review and Maintenance
Vehicle Safety Standards | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED] w www.infrastructure.gov.au



VSS MANAGEMENT BOARD (VSSMB) MEETING

20 June 2018

Attendees:

Secretariat:

MINUTES – DRAFT

Agenda Item 1: Review of Action Items

Agenda Item 4: GCM upgrade Circular 0-4-6

- [REDACTED] gave context for this paper. Circular 0-4-6 had received a lot of industry feedback with possibility of backlash. Circular had been developed at the request of industry including the Australian Automotive Aftermarket Association and received endorsement of all States and Territories. Key concerns from stakeholders were:
 - the additional expense involved in having to buy a more powerful vehicle to tow trailers, raised by Caravan Association of Victoria

- that the Circular should not be implemented retrospectively, raised by some second-stage manufacturers. US clarified it would not be implemented retrospectively.
 - that the department had banned GCM upgrades, raised in some media reporting. US clarified that this was not the case. We do not approve GCM upgrades in second stage manufacturers – there is no ADR relating to this and we would not approve since we would have no evidence whether the upgrade was safe. This remains the responsibility of States and Territories to approve GCM upgrades based on their detailed analysis of the capacity of each vehicle to sustain it i.e. whether engine and gearbox able to handle increased GCM.
- Concerns raised by Technical Panel were discussed. [REDACTED] said it was not within reach of Technical Panel to withdraw the Circular. Technical Panel endorsement of the Circular is not required, but they may provide advice on the formula for approximation of GCM.
- [REDACTED] did not agree with the statement that the VSS does not currently approve GCM upgrades.
 - [REDACTED] stated that the ADRs define GCM as Gross Vehicle Mass (GVM) plus Gross Trailer Mass (GTM), and that when the department approves GVM increase under second stage manufacture, it is also effectively approving GCM increase.
 - US stated this may be addressed by applying a limitation to the nexus between GVM and GTM – that if GVM is increased then GTM should be proportionately decreased to maintain the same GCM.
 - Technical Panel will consider this matter when it revisits the GCM approximation formula.
- **VSS Management Board agreed that [REDACTED] was to draft guidance (not in the form of a Circular) for stakeholders in relation to Recommendations 1, 3 and 4, this wording to be settled and agreed upon by States and Territories before circulation.**
 - Recommendation 1 – that Circular section 10 is applicable to NA and NB1 category vehicles
 - Recommendation 3 – that Circular section 10 does not operate retrospectively
 - Recommendation 4 – that the GCM upgrade option through the State and Territory Registration Authorities is not prohibited by the department
- **VSS Management Board agreed that Technical Panel was to reconsider Recommendation 2 and give advice on the formula for approximation of GCM.**



KENNA Allison

From: [REDACTED]
Sent: Thursday, 21 June 2018 12:00 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

Thanks [REDACTED]

From: [REDACTED]@nhvr.gov.au>
Sent: Thursday, 21 June 2018 11:59 AM

Subject: RE: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

[REDACTED]

As a light vehicle issue the NHVR has no opinion on this matter.

Regards,

[REDACTED]

National Heavy Vehicle Regulator

P: 07 3309 8561

From: [REDACTED]
Sent: Thursday, 21 June 2018 11:28 AM

[REDACTED]

Subject: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Importance: High

Dear AMVCB members

Please see the proposed text attached that the Vehicle Safety Standards (VSS) Branch has drafted for inclusion as an update on [RVCS What's New](#).

Please review and provide any comments you may have on this text back to [REDACTED] (cc'd) as soon as possible, and no later than close of business 28 June 2018. Please also let [REDACTED] know as soon as possible if you support the proposed text. VSS is looking to provide an update on [RVCS What's New](#) as soon as is possible.

Regards

[REDACTED]

A/g Section Head
Standards Review and Maintenance
Vehicle Safety Standards | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED] | w www.infrastructure.gov.au



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KENNA Allison

From: [REDACTED]
Sent: Thursday, 21 June 2018 11:43 AM
To: [REDACTED]
Subject: FW: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Attachments: Proposed text for inclusion on RVCS What's New.docx
Importance: High

FYI

From: [REDACTED]
Sent: Thursday, 21 June 2018 11:28 AM

Subject: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Importance: High

Dear AMVCB members

Please see the proposed text attached that the Vehicle Safety Standards (VSS) Branch has drafted for inclusion as an update on [RVCS What's New](#).

Please review and provide any comments you may have on this text back to [REDACTED] (cc'd) **as soon as possible**, and no later than close of business 28 June 2018. Please also let [REDACTED] know as soon as possible if you support the proposed text. VSS is looking to provide an update on [RVCS What's New](#) as soon as is possible.

Regards

[REDACTED]
A/g Section Head
Standards Review and Maintenance
Vehicle Safety Standards | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594. Canberra ACT 2601

w www.infrastructure.gov.au

KENNA Allison

From: [REDACTED]@tmr.qld.gov.au>
Sent: Thursday, 21 June 2018 11:40 AM
To: [REDACTED]

Cc:
Subject: RE: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]

We have reservations about the proposed text. As such, we do not support it. More detailed response will be provided soon.

Regards

[REDACTED]
Vehicle Standards & Accreditation
Transport & Main Roads

From: [REDACTED]
Sent: Thursday, 21 June 2018 11:28 AM

[REDACTED]

Subject: Proposed text for inclusion on RVCS What's New to clarify the clause 10.6 requirements of the recently issued Administrator's Circular 0-4-6 [SEC=UNCLASSIFIED]
Importance: High

Dear AMVCB members

Please see the proposed text attached that the Vehicle Safety Standards (VSS) Branch has drafted for inclusion as an update on [RVCS What's New](#).

Please review and provide any comments you may have on this text back to [REDACTED] c'd) as soon as possible, and no later than close of business 28 June 2018. Please also let [REDACTED] know as soon as possible if you support the proposed text. VSS is looking to provide an update on [RVCS What's New](#) as soon as is possible.

Regards

A/g Section Head
Standards Review and Maintenance
Vehicle Safety Standards | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

www.infrastructure.gov.au

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Opinions contained in this email do not necessarily reflect the opinions of the Department of Transport and Main Roads, or endorsed organisations utilising the same infrastructure.

KENNA Allison

From: [REDACTED] S47F
Sent: Thursday, 21 June 2018 11:37 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Changes to Circular 0-4-6 Clause 10.6 - GCM Re-Rating of New Vehicles [SEC=UNCLASSIFIED]

[REDACTED]

This matter was raised by industry as a concern and review of 0-4-6 undertaken in conjunction with State and Territory regulators.

Regards,

S22

From: James Field <[REDACTED] S47F>
Sent: Tuesday, 19 June 2018 10:41 AM
[REDACTED]
S22
C [REDACTED]
Subject: Changes to Circular 0-4-6 Clause 10.6 - GCM Re-Rating of New Vehicles

Good morning [REDACTED] S22

I hope you are both well? We note the recent amendment to Circular 0-4-6, in particular clause 10.6 which now reads ***the towing capacity of a light vehicle expressed as Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating must not exceed the value set by the first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade.***

Are you able to provide a rationale or feedback around why this has been changed by the department?

Look forward to your feedback.

Regards

[REDACTED]
Technical Liaison
Caravan Industry Association of Australia Ltd

[REDACTED] S47F

Websites

Consumer: www.letsocaravanandcamping.com.au

Corporate: www.caravanindustry.com.au



Vision

To lead and champion a robust, compliant & sustainable caravanning & camping industry.



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KENNA Allison

From: [REDACTED] All redactions s22
Sent: Thursday, 21 June 2018 10:50 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Approval to do AMVCB consultation on Circular 0-4-6 clarification [SEC=UNCLASSIFIED]
Attachments: Wording for AMVCB.docx

[REDACTED]

As discussed, please commence urgent consultation with AMVCB.

Regards

[REDACTED]

From: WHATSON Alison
Sent: Wednesday, 20 June 2018 5:32 PM

[REDACTED]

Subject: FW: Approval to do AMVCB consultation on Circular 0-4-6 clarification [SEC=UNCLASSIFIED]

Thanks [REDACTED] just a little tweak on the basis that this will be text on RVCS What's New. If it is possible for a shorter turnaround that would be great so that we can refer to this clarification. If that's not possible I understand.

Thanks
Alison

From: [REDACTED]
Sent: Wednesday, 20 June 2018 3:54 PM
To: WHATSON Alison <Alison.Whatson@infrastructure.gov.au>

[REDACTED]

Subject: Approval to do AMVCB consultation on Circular 0-4-6 clarification [SEC=UNCLASSIFIED]

Alison

As discussed, please approve the attached text for consultation with AMVCB members on clarifications for clause 10.6 of Circular 0-4-6. We would be allowing one week for this consultation.

[REDACTED]

Director Certification and RAWS
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED]

Clarification of Circular 0-4-6 Amendment – seeking AMVCB comments

This ~~paper-update further~~ clarifies clause 10.6 requirements for recently issued Administrator's Circular 0-4-6 (Issue 4, June 2018).

Circular 0-4-6 was amended to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade under Clause 10.

The guidance provided by the Circular applies to Light Vehicles that includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

The Circular only applies to new applications and new amendments to existing Identification Plate Approvals (IPAs).

The Circular will not affect the existing IPAs held by the second stage manufacturers. Existing IPA holders can continue to supply to the market vehicles covered by the approved Road Vehicle Descriptors (RVDs). This includes vehicles where the approved RVD has variants that exceed the first stage manufacturer's Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating.

The option of GCM upgrade continues to be available to consumers, after supply to the market, through the State/Territory registration authorities where applicable.

KENNA Allison

From: [REDACTED]
Sent: Wednesday, 20 June 2018 5:59 PM
To: WHATSON Alison
Subject: RE: Constituent enquiry. [SEC=UNCLASSIFIED]

UNCLASSIFIED

Thanks. I appreciate it.

Sent with BlackBerry Work
(www.blackberry.com)

UNCLASSIFIED

From: WHATSON Alison <Alison.Whatson@infrastructure.gov.au>
Date: Wednesday, 20 Jun 2018, 5:32 pm
[REDACTED]
Subject: RE: Constituent enquiry. [SEC=UNCLASSIFIED]

Thanks [REDACTED] you have a great manner in dealing with our regulated entities.

Alison

Alison Watson
A/g General Manager
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601
[REDACTED]
e Alison.whatson@infrastructure.gov.au | w www.infrastructure.gov.au

From: [REDACTED]
Sent: Wednesday, 20 June 2018 4:53 PM
To: WHATSON Alison <Alison.Whatson@infrastructure.gov.au>
Subject: RE: Constituent enquiry. [SEC=UNCLASSIFIED]

Alison

I have contacted Mike Briggs who is the Director of Six Wheeler Conversions and is the Delegate in RVCS. I have also spoken to J [REDACTED] who had approached Minister's office. [REDACTED] works for Mike Briggs. As [REDACTED] is not listed in RVCS as Delegate or Signatory, I had contacted Mike on this issue. We have also received the attached correspondence from Mike on this issue which we will respond to.

He was concerned about the status of his existing approvals. Also as mentioned in his correspondence, he raised the issue of and [REDACTED] for which Company has made financial commitment and Company is in advanced stage of development. He might seek special consideration for [REDACTED] where he has prior commitment. I have informed him that currently we are conducting a review and doing consultation with States on a proposal that Circular will not be applicable to existing approvals. Until that review is complete, Company can continue to supply vehicles covered by the approved design under their existing Approvals.

He was satisfied with the suggested outcome. I have provided him with my mobile number in case he wishes to discuss this matter further.

Regards

[REDACTED]
Director Certification and RAWS
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601
[REDACTED]
[REDACTED]







Six Wheeler Conversions Pty Ltd
1 Brook St, North Toowoomba, Qld, 4350
Australia

mike@sixwheeler.com.au

<http://www.sixwheeler.com.au/>

<https://www.facebook.com/sixwheeler.com.au>

Open letter regarding towing capacity and GCM upgrades on light vehicles.

The latest circular from RVCS, has certainly created quite a stir in the towing community, particularly those towing recreational equipment such as larger caravans, fifth wheelers and boats.

Whilst I'm keen to support any improvement to road safety and I'm sure these changes come with the best intentions, the obvious solution isn't always the right one and a rigid ruling to stop all towing capacity upgrades on light vehicles is counterproductive from a safety perspective, given the current environment.

The current environment:

As our transport departments are aware, there are currently thousands of light vehicles on our roads which are exceeding combinations of GVM, GCM and towing capacity. This is particularly prevalent with but not limited to caravans, campers, motorhomes, etc. but this isn't a group of willing lawbreakers. These motorists have mostly been caught out by ambiguous marketing and weight ratings by vehicle and caravan manufacturers and an underestimation of the weight of the products they need to carry for life on the road.

Many of these people have bought light vehicles with 3500kg tow ratings (the highest available on any new ute under about \$130,000), with 3500kg ATM caravans; only to later discover that the 6,000kg GCM leaves their tow vehicle with a payload of less than 300kg including 2-5 occupants and at least 90kg of fuel. Many also discover that their van is over ATM by the time they're on the road because these big vans have high and often underquoted tare weights. The Queensland Caravan Show, last week had many manufacturers promoting huge vans at 3500kg ATM, with tare weights of over 3000kg.

RVCS has allowed car manufacturers to promote high tow capacities, with unrealistically low GCMs and allowed caravan manufacturers to promote big vans with unrealistically low payloads for years. This has trapped many motorists, who've unwittingly found themselves over ATM and GCM. For many of these motorists, it's unaffordable or impractical for them to trade up from their already accessorised \$45-65,000 BT50/Ranger/Dmax, etc. to a massive \$130-180,000 American pick-up or a rigid truck. The sheer size of these other vehicles often makes them completely impractical for many people who need to be able to park in shopping centres and CBD parking when they aren't towing.

These motorists want to obey the law and make their setups safe but unless there is a practical and affordable solution, they're forced to plead ignorant and keep motoring.

Closing the door to towing capacity and GCM upgrades will also reduce the viability of upgrading the ATM of these vans which have unrealistic payloads, many of which are already built to higher ATM specs than what is marked on the compliance plate. This in turn will have a severe effect on the resale value of these vans due to a reduction in the number of viable tow vehicle options.

My company, Six Wheeler Conversions Pty Ltd (and some others around Australia) has been providing an affordable solution for many years by adding an extra braked axle to the rear of many of these vehicles. This conversion comes at an average price of about \$25,000 including a high-quality tray body.

This results in a drastic increase in towing safety from the following factors.

- More road contact area. (50% more rubber on the road)
- Up to 30% greater braking capacity (2 extra rotors/drums)
- Much better stability, with at least 66% increase in carrying capacity of rear axle group.
- 15% longer effective wheelbase also improves stability.
- Increased tare weight (about 18-25%), which provides ballast to counteract trailer weight increase.

The engines and drivelines of Isuzu Dmax, Ford Ranger, Toyota Landcruiser, Mazda Bt50 and some other models have been well proven to be capable of hauling more than their original stated GCMs at highway speeds and up steep gradients and they have low range and 4wd available for emergencies, mostly at the press of a button or flick of a switch.

In fact, these modern 4wd utes now have outputs ranging from 130kw/430nm to 165kw/550nm, whilst 20 to 30 years ago, many of our customers were successfully running heavier combinations with Landcruisers and Patrols, with outputs as low as 80kw/240nm (Toyota 2H). Bear in mind that Australian roads don't have the long steep gradients found in other continents such as Europe and America.

However, RVCS Administrator's Circular 0-4-6, released last week casts a shadow on the viability of development of future models for conversion, with the following statement:

10.6 The towing capacity of a light vehicle expressed as Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating must not exceed the value set by the first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade.

This was released with no warning and with less than one month from publication to enactment. This also places the viability of my entire company at risk because it will drastically reduce the market for my conversions. I've also invested considerable resources in a project to develop a new conversion for the VW Amarok V6 (which promises to make a fantastic tow vehicle, with full-time 4wd, 6 wheel disc brakes, a wide track, low centre of gravity and a powerful V6 driveline, which will easily handle trailers of 4000kg and over), including an overseas trip where I met with Volkswagen engineers to discuss the project.

This mock-up/concept vehicle was shown at the Queensland Caravan Show, to gauge market response and interest because we've already done most of the design work and the overwhelming public response is that there is a healthy niche market and this vehicle will solve many people's towing requirements.

(Note the asterisks and fine print, which clarified that the advertised capacities were estimated figures and subject to testing and approval.)



Coming Soon!

V6 Amarok 6 Wheeler
 Up to 4500kg GVM*/1700kg payload*
 Increased towing capacity/GCM*
 Up to 2.6m tray on dual cab!

*Estimated maximum payload based on approved GVM. On loading & towing. Always use appropriate loading techniques to ensure safe use of vehicle.

Carry more and tow more, with the ultimate road-size tow vehicle. Combine the V6 Amarok's class-leading power, brakes, handling and comfort with the ultimate upgrade, from Six Wheeler Conversions PL and Austral VW.

6W CARRY MORE

Facebook

Surely RVCS can issue an exemption to rule 10.6 for multi-axle conversions (and maybe some other upgrades) which can demonstrate significant increases in towing safety. This provides a viable option for many of the motorists mentioned above, who need a practical affordable means to acquire compliant vehicles to tow their equipment and enables a few Australian family businesses to remain viable and productive.

Regards,


Mike Briggs

Director

KENNA Allison

From: WHATSON Alison
Sent: Wednesday, 20 June 2018 5:32 PM
To: [REDACTED]
Subject: FW: Approval to do AMVCB consultation on Circular 0-4-6 clarification [SEC=UNCLASSIFIED]
Attachments: Wording for AMVCB.docx

Thanks [REDACTED] just a little tweak on the basis that this will be text on RVCS What's New. If it is possible for a shorter turnaround that would be great so that we can refer to this clarification. If that's not possible I understand.

Thanks
Alison

From: [REDACTED]
Sent: Wednesday, 20 June 2018 3:54 PM
To: WHATSON Alison <Alison.Whatson@infrastructure.gov.au>
[REDACTED]
Subject: Approval to do AMVCB consultation on Circular 0-4-6 clarification [SEC=UNCLASSIFIED]

Alison

As discussed, please approve the attached text for consultation with AMVCB members on clarifications for clause 10.6 of Circular 0-4-6. We would be allowing one week for this consultation.

Regards

[REDACTED]
Director Certification and RAWS
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601
[REDACTED]

Clarification of Circular 0-4-6 Amendment – seeking AMVCB comments

This ~~paper-update~~ further clarifies clause 10.6 requirements for recently issued Administrator's Circular 0-4-6 (Issue 4, June 2018).

Circular 0-4-6 was amended to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade under Clause 10.

The guidance provided by the Circular applies to Light Vehicles that includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

The Circular only applies to new applications and new amendments to existing Identification Plate Approvals (IPAs).

The Circular will not affect the existing IPAs held by the second stage manufacturers. Existing IPA holders can continue to supply to the market vehicles covered by the approved Road Vehicle Descriptors (RVDs). This includes vehicles where the approved RVD has variants that exceed the first stage manufacturer's Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating.

The option of GCM upgrade continues to be available to consumers, after supply to the market, through the State/Territory registration authorities where applicable.

KENNA Allison

From: WHATSON Alison
Sent: Wednesday, 20 June 2018 8:15 AM
To: [REDACTED]
Subject: RE: Technical panel - progressing the issue of GCM variation [SEC=UNCLASSIFIED]

Thank you [REDACTED]

The Technical Panel is NOT to undertake any course of action or consider any option that would change the effect of the amended Administrative Circular 0-4-6.

Thanks
Alison

Alison Watson
A/g General Manager
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601
[REDACTED]
e Alison.whatson@infrastructure.gov.au | w www.infrastructure.gov.au

From: [REDACTED]
Sent: Tuesday, 19 June 2018 5:39 PM
To: WHATSON Alison <Alison.Whatson@infrastructure.gov.au>
Subject: FW: Technical panel - progressing the issue of GCM variation [SEC=UNCLASSIFIED]

FYI

From: [REDACTED]
Sent: Tuesday, 19 June 2018 5:21 PM

Subject: Technical panel - progressing the issue of GCM variation [SEC=UNCLASSIFIED]

All,

These were the options for advancing GCM issue from technical panel today:

1. We decide the SSM is the manufacturer and leave them to set whatever limit they choose
2. We develop guidance for how to manage GCM/GVM/RTC modifications including broader clarifications on how the guidance is applied, transition periods etc
3. We ask the 1st stage manufacturers of NA and NB1 vehicles to supply value for GCM or migrate these vehicle categories across to RVD2 form, where GCM is required.

4. We cap GVM and Towing mass (including values for unbraked)
5. We could cease with the issue of GVM upgrade approvals
6. We could change the definitions within the ADRs.

Approvals relying on ADR 31 evidence need to be checked to see if adjustments have been made for the unbraked towing value from Annex 3.

Thanks to all who attended and contributed.

Regards,



KENNA Allison

From: [REDACTED]
Sent: Wednesday, 20 June 2018 3:54 PM
To: WHATSON Alison
Cc: [REDACTED]
Subject: Approval to do AMVCB consultation on Circular 0-4-6 clarification
[SEC=UNCLASSIFIED]
Attachments: Wording for AMVCB.docx

Alison

As discussed, please approve the attached text for consultation with AMVCB members on clarifications for clause 10.6 of Circular 0-4-6. We would be allowing one week for this consultation.

Regards

[REDACTED]
Director Certification and RAWS
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601
[REDACTED]

[Signature]

Clarification of Circular 0-4-6 Amendment – seeking AMVCB comments

This paper further clarifies clause 10.6 requirements for recently issued Administrator's Circular 0-4-6 (Issue 4, June 2018).

Circular 0-4-6 was amended to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade under Clause 10.

The guidance provided by the Circular applies to Light Vehicles that includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

The Circular only applies to new applications and new amendments to existing Identification Plate Approvals (IPAs).

The Circular will not affect the existing IPAs held by the second stage manufacturers. Existing IPA holders can continue to supply to the market vehicles covered by the approved Road Vehicle Descriptors (RVDs). This includes vehicles where the approved RVD has variants that exceed the first stage manufacturer's Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating.

The option of GCM upgrade continues to be available to consumers, after supply to the market, through the State/Territory registration authorities where applicable.

KENNA Allison

From: [REDACTED]
Sent: Wednesday, 20 June 2018 3:04 PM
To: [REDACTED]
Subject: Revised wording concerning Circular 0-4-6 amendment for AMVCB approval [SEC=UNCLASSIFIED]
Attachments: Wording for AMVCB.docx

Hi [REDACTED]

Revised wording attached and provided below

This paper further clarifies the recent amendment to Administrator's Circular 0-4-6 and seeks AMVCB approval.

Circular 0-4-6 was amended to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade.

The guidance provided by the Circular applies to Light Vehicles and includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

The Circular only applies to new applications and new amendments to existing IPAs.

Existing approvals can continue to supply to the market where the Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating exceeds the value set by the first stage manufacturer.

The option of GCM upgrade is still available to consumers, after supply to the market, through the State/Territory registration authorities where applicable.

Kind regards
[REDACTED]

From: [REDACTED]
Sent: Wednesday, 20 June 2018 12:50 PM
[REDACTED]

Subject: Wording concerning Circular 0-4-6 amendment for AMVCB approval [SEC=UNCLASSIFIED]

Hi [REDACTED] I have attached a document with wording for the AMVCB. It has the same wording as the Blue text below

This paper further clarifies the recent amendment to Administrator's Circular 0-4-6 and seeks AMVCB approval.

Circular 0-4-6 was amended to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade.

The guidance provided by the Circular applies to Light Vehicles and includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

The Circular is not retrospective and only applies to new applications and new amendments to existing IPAs.

Existing approvals can continue to supply to the market where the Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating exceeds the value set by the first stage manufacturer.

It is not the intention of the Department to stop consumers from upgrading the GCM rating of their vehicles. The option of GCM upgrade is still available to consumers, after supply to the market, through the State/Territory registration authorities where applicable.

Kind regards

[Redacted]
Team Member | Vehicle Safety Standards
Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[Redacted] | w www.infrastructure.gov.au

KENNA Allison

From: [REDACTED]
Sent: Wednesday, 20 June 2018 1:49 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Circular 0 - 4 - 6 Clarification

Good Afternoon Gentlemen,

I write in relation to the recently released Administrators Circular 0 - 4 - 6 [Issue 4 June 2018] relating to Certification of Vehicles Which Have Undergone a Second-Stage-of-Manufacture, and request clarification.

In particular, I am concerned about the condition at Clause 10.6 which prohibits the increase in Gross Combination Mass [GCM].

I can understand the intent of the revision, as that has also been of my concern when observing what some SSM providers are presenting, particularly in relation to GVM upgrades on 4x4 only vehicles. Also of concern is where a 4x4 is converted to a 6x4 with increased GVM and also retaining the original towing capacity without any appropriate strengthening of the Rear Drive Axle or Differential.

My [REDACTED] converts existing 4x4 vehicles into either 6x4 or 6x6 variants. This process requires extensive modification and strengthening to the rear Chassis Frame in order to support the unique Suspension system to carry the additional payload, and also provide adequate strength to retain the original towing rating.

The Suspension system, be it on either a "light vehicle" or "heavy vehicle" variant utilizes either Coil or air suspension on a highly articulated 50/50 load-share system incorporating OEM Axles. Although the original Axle ratings are not exceeded, the Rear Axles are reinforced to adequately accommodate the revised payload and GCM. Mechanical testing of the Axles has shown that the strength of the modified Axles, even when the Wheel Track is widened, is significantly superior to the original.

The design of the articulated suspension incorporates a "rear steer" element which assists in vehicle stability, particularly when negotiating corners, and as well as during a "lane change procedure". And this would assist in effective operation of the ESC system, and provide the required tow vehicle stability for the retained towing capacity.

Further, on the [REDACTED] nominated GCM, an analysis is carried out of both the Chassis Frame and the complete drive train from Engine through to Differential to ensure that relevant component capacities are not excessive.

Both [REDACTED] and myself are available to discuss this matter in greater detail.

Kind Regards,

Alan I [REDACTED]
Consulting Engineer
All Vehicle Compliance Pty Ltd
Brisbane
[REDACTED]

From: [REDACTED]
Sent: Wednesday, 20 June 2018 12:50 PM
To: [REDACTED]
Subject: Wording concerning Circular 0-4-6 amendment for AMVCB approval
[SEC=UNCLASSIFIED]

Hi [REDACTED] have attached a document with wording for the AMVCB. It has the same wording as the Blue text below

This paper further clarifies the recent amendment to Administrator's Circular 0-4-6 and seeks AMVCB approval.

Circular 0-4-6 was amended to include arrangements for SSM Light Vehicles that have been subject to a Gross Vehicle Mass (GVM) upgrade.

The guidance provided by the Circular applies to Light Vehicles and includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles.

The Circular is not retrospective and only applies to new applications and new amendments to existing IPAs.

Existing approvals can continue to supply to the market where the Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating exceeds the value set by the first stage manufacturer.

It is not the intention of the Department to stop consumers from upgrading the GCM rating of their vehicles. The option of GCM upgrade is still available to consumers, after supply to the market, through the State/Territory registration authorities where applicable.

[REDACTED]
Team Member | Vehicle Safety Standards
Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

| w www.infrastructure.gov.au

From: [REDACTED]
Sent: Tuesday, 19 June 2018 5:21 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Technical panel - progressing the issue of GCM variation [SEC=UNCLASSIFIED]

All,

These were the options for advancing GCM issue from technical panel today:

1. We decide the SSM is the manufacturer and leave them to set whatever limit they choose
2. We develop guidance for how to manage GCM/GVM/RTC modifications including broader clarifications on how the guidance is applied, transition periods etc
3. We ask the 1st stage manufacturers of NA and NB1 vehicles to supply value for GCM or migrate these vehicle categories across to RVD2 form, where GCM is required.
4. We cap GVM and Towing mass (including values for unbraked)
5. We could cease with the issue of GVM upgrade approvals
6. We could change the definitions within the ADRs.

Approvals relying on ADR 31 evidence need to be checked to see if adjustments have been made for the unbraked towing value from Annex 3.

Thanks to all who attended and contributed.

Regards,

[REDACTED]

Subject: Technical panel meeting
Location: AL2E large meeting room

Start: Tue 19/06/2018 2:30 PM
End: Tue 19/06/2018 3:30 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer:
Required Attendees:

Latest update is adding an additional paper on Circular 0-4-6 SSM GVM upgrades in relation to GCM
Update is changing text only, below to Tuesday.
Update to paper on Toyota Big Van

Good morning,

You are invited to attend technical panel meeting on **Tuesday 19 of June** at the Alinga 2 East Meeting room. 2:30 to 3:30

Technical panel paper attached, please send any additional papers to me and I will distribute. As always, please forward this to those that should be involved.

Kind Regards,

Technical Officer, Certification & RAWS
Vehicle Safety Standards
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601



Australian Government
Department of Infrastructure,
Regional Development and Cities

VSSB TECHNICAL PANEL

No.	Date: 19 June 2018
<p>Define the issue:</p> <p>A recent amendment to Administrator's Circular 0-4-6 has caused concern within the industry in relation to the GCM and Rated Towing Capacity for Light Vehicles subject to a SSM GVM upgrade.</p> <p>The amended Circular maintains the first stage manufacturers GCM rating for Light Vehicles should not be exceeded by SSM GVM upgrade. The Circular was supported through some consultation with industry and relevant State and Territory authorities.</p> <p>Clarifications needed are:</p> <ol style="list-style-type: none"> 1. That section 10 of 0-4-6 applies to light vehicles and the definition of a light vehicle. 2. How GCM will be determined. 3. The requirements of the updated 0-4-6 will not be applied retrospectively and the validity of approvals currently in contradiction of the advice provided by 0-4-6. 4. Avenues available for GCM upgrade. 	
<p>Outline the current approach (if any):</p> <p>The Department regulates the GVM of individual Light Vehicles and does not collect information on the GCM of a Light Vehicle.</p> <p>The current approach is to let the State and Territory registration authorities enforce Light Vehicle GCM.</p>	
<p>Outline any legal or administrative constraints:</p> <p>The Australian Design Rules define GCM as:</p> <p>GROSS COMBINATION MASS - value specified for the vehicle by the '<i>Manufacturer</i>' as being the maximum of the sum of the '<i>Gross Vehicle Mass</i>' of the drawing vehicle plus the sum of the '<i>Axle Loads</i>' of any vehicle capable of being drawn as a trailer.</p> <p>ADR 35/XX does not take combinations of vehicles into account ADR 31/XX does have additional requirements for braking with a trailer. There are service brake system requirements for unbraked trailers. Also, the parking brake system is required to take combinations into account. These do not directly relate to GCM.</p> <p>Identification plates of Light Vehicles do not have GCM details on their Identification Plate. This includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles. Whereas, Identification plates for NB2 and higher category vehicles have GCM details.</p>	
<p>Identify possible solutions:</p> <ol style="list-style-type: none"> 1. Clarification of the wording of the Circular can amended to clarify that NA and NB1 category vehicles are included as Light Vehicles. <div style="background-color: #cccccc; height: 100px; width: 100%;"></div>	



[Redacted]

Sent: Tuesday, 19 June 2018 10:28 AM
To: [Redacted]
Subject: GCM tech panel paper [SEC=UNCLASSIFIED]
Attachments: VSSB TECHNICAL PANEL - 0-4-6 SSM GVM upgrade v2.docx

[Redacted]

Draft tech panel paper for your consideration.

Thanks,

[Redacted]

VSSB TECHNICAL PANEL

No.	Date: 19 June 2018
<p>Define the issue:</p> <p>A recent amendment to Administrator's Circular 0-4-6 has caused concern within the industry in relation to the GCM and Rated Towing Capacity for Light Vehicles subject to a SSM GVM upgrade.</p> <p>The amended Circular maintains the first stage manufacturers GCM rating for Light Vehicles should not be exceeded by SSM GVM upgrade. The Circular was supported through some consultation with industry and relevant State and Territory authorities.</p> <p>Clarifications needed are:</p> <ol style="list-style-type: none"> 1. That section 10 of 0-4-6 applies to light vehicles and the definition of a light vehicle. 2. How GCM will be determined. 3. The requirements of the updated 0-4-6 will not be applied retrospectively and the validity of approvals currently in contradiction of the advice provided by 0-4-6. 4. Avenues available for GCM upgrade. 	
<p>Outline the current approach (if any):</p> <p>The Department regulates the GVM of individual Light Vehicles and does not collect information on the GCM of a Light Vehicle.</p> <p>The current approach is to let the State and Territory registration authorities enforce Light Vehicle GCM.</p>	
<p>Outline any legal or administrative constraints:</p> <p>The Australian Design Rules define GCM as:</p> <p>GROSS COMBINATION MASS - value specified for the vehicle by the '<i>Manufacturer</i>' as being the maximum of the sum of the '<i>Gross Vehicle Mass</i>' of the drawing vehicle plus the sum of the '<i>Axle Loads</i>' of any vehicle capable of being drawn as a trailer.</p> <p>ADR 35/XX does not take combinations of vehicles into account ADR 31/XX does have additional requirements for braking with a trailer. There are service brake system requirements for unbraked trailers. Also, the parking brake system is required to take combinations into account. These do not directly relate to GCM.</p> <p>Identification plates of Light Vehicles do not have GCM details on their Identification Plate. This includes NA (GVM up to 3.5 tonnes) and NB1 (GVM over 3.5 tonnes and up to 4.5 tonnes) category vehicles. Whereas, Identification plates for NB2 and higher category vehicles have GCM details.</p>	
<p>Identify possible solutions:</p> <ol style="list-style-type: none"> 1. Clarification of the wording of the Circular can amended to clarify that NA and NB1 category vehicles are included as Light Vehicles. 	



KENNA Allison

From: [REDACTED]
Sent: Monday, 18 June 2018 10:49 AM
To: WHATSON Alison
Subject: FW: AMVCB226 - Agenda 7(a) Draft 0-4-6 GVM upgrade inclusion v3.docx [DLM=For-Official-Use-Only]
Attachments: AMVCB226 - Agenda 7(a) Draft 0-4-6 GVM upgrade inclusion v3.docx; RE: Light vehicle GVM increases... [SEC=UNCLASSIFIED, DLM=Sensitive] [SEC=UNCLASSIFIED]; RE: Light vehicle GVM increases... [SEC=UNCLASSIFIED, DLM=Sensitive] [SEC=UNCLASSIFIED]; FW: Light vehicle GVM increases... [SEC=UNCLASSIFIED, DLM=Sensitive] [SEC=UNCLASSIFIED]

Alison

As requested, please find below details on Circular 0-4-6 consultation with AMVCB. The view of various States on GCM issue is also attached.

Regards

[REDACTED]
 Director Certification and RAWS
 Vehicle Safety Standards Branch | Surface Transport Policy Division
 Department of Infrastructure, Regional Development and Cities
 GPO Box 594, Canberra ACT 2601

This material contains information that, if disclosed inappropriately, may cause limited damage to national security, Australian Government agencies, commercial entities or members of the public. Recipients should ensure they handle and store this material appropriately.

From: [REDACTED]
Sent: Monday, 18 June 2018 9:48 AM

Subject: AMVCB226 - Agenda 7(a) Draft 0-4-6 GVM upgrade inclusion v3.docx [DLM=For-Official-Use-Only]

As per your request, attached is the paper which was presented to AMVCB226 Members late in the day. The circular was not discussed in great detail as the majority of this meeting was taken up by an RVSA workshop. I have also attached emails from 17 April which is the original request to circulate 0-4-6. All papers presented at AMVCB226 are available here: <https://govdex.gov.au/confluence/display/AMVCB/AMVCB226+Meeting+Paper+Submissions>
 Happy to discuss further if need be.

Rgds

This material contains information that, if disclosed inappropriately, may cause limited damage to national security, Australian Government agencies, commercial entities or members of the public. Recipients should ensure they handle and store this material appropriately.



CIRCULAR 0 – 4 – 6

CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OF-MANUFACTURE

1. INTRODUCTION

1.1 This Circular sets out the requirements for *Manufacturers* making application for Identification Plate Approval (IPA) for additions to, or modifications undertaken on a *New Vehicle* that already has affixed a completed vehicle Identification Plate. Such arrangements are identified as “Second-Stage-of-Manufacture” (SSM) IPA.

1.2 A further SSM arrangement can also apply to completed SSM vehicles. (For example, a completed *cab-chassis* may be modified to be dual-steer under SSM approval, and then that completed dual-steer *cab-chassis* vehicle may then have its GVM upgraded under a further SSM approval).

2. APPLICABILITY

2.1 SSM arrangements only apply to *New Vehicles* as defined in the *Motor Vehicle Standards Act 1989*, and do not apply to vehicles that have already been used in transport.

2.2 SSM arrangements apply to vehicle make/model types seeking IPA under the Full Volume arrangements, and also the concessionary evidence Low Volume arrangements.

2.3 Vehicles under the SSM IPA Low Volume arrangements are not subject to an eligibility ruling under the “Specialist and Enthusiast Vehicle Scheme (SEVS) Eligibility” as per Circular 0-2-12.

2.4 Arrangements for SSM do not apply to vehicles that are built on, or based on vehicle sub-assemblies/chassis that have been approved under Sub-Assembly Registration Number (SARN) arrangements as set out in Circular 0-4-23.

2.5 Arrangements for SSM do not apply to vehicles without an Identification Plate, such as a vehicle imported from overseas which has yet to be brought up to the National Standards. Such vehicles are subject to either the “Motor Vehicle Compliance Plate Approval” arrangements as per Circular 0-3-4, or the “Certification of Motor Vehicles Produced in Low Volume” requirements as per Circular 0-2-1.

2.6 Arrangements for SSM do not need to be used where the proposed modification can be done under the provisions of Vehicle Standards Bulletin (VSB) 6. However, where the proposed modifications are not within the scope of VSB6, SSM must be used.



3. APPLICATION FOR IDENTIFICATION PLATE APPROVAL

3.1 Applications for SSM IPA will only be accepted from a legal entity (Company or Individual, and not a business or trading name) that must first register as a Licensee on the Road Vehicle Certification System (RVCS), and have both the Production Facility and Design Facility similarly registered on RVCS thus being subject to "Conformity of Production" arrangements as per Circular 0-13-1.

3.2 Make and Model designation shall generally be in accordance with Circular 0-3-3 "Motor Vehicle Make and Model Designation".

3.2.1 The "Make-Model" designation must be unique from all other Identification Plate Approvals.

3.2.2 The "Make" of the SSM should comprise a prefix, representing the second-stage manufacturer, followed by the "Make" of the completed first-stage vehicle. For example:-

- A SSM modified "ALPHA", might be designated "ABC ALPHA".

3.2.3 The "Model" of the SSM should include qualification as to the SSM vehicle type. For example:-

- An SSM modified "ALPHA Beta", might be designated "ABC ALPHA Beta Ambulance", or "ABC ALPHA Beta Motorhome" as appropriate.

3.3 The SSM IPA arrangements are available to new vehicles subject to addition and/or modification, except where the nature of the addition and/or modification does not impact on the ADR certification of the first-stage vehicle, or when the impact is considered to be minor, and readily examined by the State/Territory registration authorities. Examples of additions/modifications considered to be of State/Territory responsibility are:-

- Where the original rearward facing lamp units of a new *chassis-cab* are relocated with the adding of an otherwise non-ADR impacting goods carrying body.
- Where the original external rear vision mirrors of a new *chassis-cab* are relocated to accommodate added goods carrying bodies of variable width.
- Where additional Side-Marker lamps are added to a commercial vehicle *chassis-cab*.
- Non-ADR-relevant body added to a commercial vehicle *chassis-cab*.
- A *heavy goods vehicle* wheelbase extension.

NOTE: Vehicle Standards Bulletin VSB.6, Heavy Vehicle Modifications, applies to modifications to heavy vehicles with a GVM greater than 4.5 tonnes, or heavy trailers with an ATM greater than 4.5 tonnes.



3.4 Typical examples of modified new vehicles that should access these SSM arrangements are: -

- Light and Medium Goods vehicles subject to a Gross Vehicle Mass upgrade and/or a reduction in Lightly Laden Test Mass.
- Passenger vehicle cut and stretched to become a Limousine or Hearse.
- Vehicle subject to an engine/fuel type replacement or modification.
- Ambulance, Motorhome or Fire Tender body added to a *chassis-cab*.
- Vehicle modified to carry wheel-chair passengers or additional seats.
- Vehicles modified from one ADR vehicle category to another vehicle category.

3.5 There are specific requirements for campervans and motorhomes, including when certified under SSM arrangements. These requirements are set out in Circular 0-4-12 "Certification of Campervans and Motorhomes".

4. AUSTRALIAN DESIGN RULE EVIDENCE

4.1 Applications for SSM IPA must include an Application for Compliance Approval (Motor Vehicle) form, a Road Vehicle Descriptor, relevant Selection of Fleet submissions (SF forms) and resultant ADR evidence via RVCS, providing evidence of compliance with all ADRs applicable to the completed added to, or modified vehicle, and not solely evidence applicable to the second-stage work.

4.1.1 "Compliance Demonstrated Using SARN(s) (MV)" forms may be submitted to carry over evidence already provided within the first-stage completed vehicle Approval, if that evidence remains unaltered by the second-stage manufacture's additions and/or modifications. Certification responsibility for any carry-over ADR evidence remains with the holder of the first-stage IPA.

4.1.2 In submitting a "Compliance Demonstrated Using SARN(s)(MV)" form, the SSM makes a declaration that the ADR evidence to be carried over has been subject to appropriate examination attesting that it remains unaffected by the second-stage manufacture.

4.1.3 Where the second-stage manufacture has an indirect effect on the first-stage evidence, but the second-stage manufacturer can demonstrate that the tests conducted by the first-stage manufacturer would also cover the second-stage work satisfactorily, then for the purposes of seeking SSM IPA this ADR evidence can also be carried over.

4.2 Any additions and/or modifications to the original vehicle must be supported by evidence of ADR compliance, as appropriate, and in the form provided by: -

- Full Volume arrangements as per Circular 0-3-4 "Motor Vehicle Compliance Plate Approval", or
- As per Circular 0-2-1 "Certification of Motor Vehicles Produced in Low Volume".

Issued by the

Administrator of Vehicle Standards

inconsultation with the

Australian Motor Vehicle Certification Board

comprising Commonwealth, State and Territory representatives



Australian Government

Department of Infrastructure, Regional Development and Cities

4.3 Application for SSM IPA can only be based on one first-stage IPA, with a separate SSM application required for each different first-stage vehicle Approval. Accordingly, any carry over evidence, as per 4.1.1 above, can only reference the one first-stage Approval.

4.4 A SSM IPA can include multiple vehicle variants and multiple engines and other options included in the SSM RVD, as supported by the evidence of ADR compliance provided.

4.5 Applications for SSM IPA are expected to demonstrate compliance with all ADRs applicable as of the date of issue of the SSM IPA. However if a completed first-stage vehicle IPA does not yet include a new ADR introduced under transitional implementation arrangements, then the SSM may submit an SE blank-form, and make application for an exemption from that ADR by referencing this Circular 0-4-6 clause 4.5. If exemptions are granted, then the SE blank-form will be noted as “**Not Applicable**”, and details of the exemption will be included in Schedule 5 of the Approval. Where such exemptions are provided the applicability date of the ADR will be noted, and the Approval issued will be restricted to the due date of that ADR. When the exempted evidence is subsequently provided, the Approval will be reissued without this date restriction.

4.6 Circular 79/00-1-1 “Second-Stage-of-Manufacture Emissions Evidence where there is an increase in GVM” details the arrangements that apply for emissions ADRs.

5. CHANGE IN VEHICLE CATEGORY

5.1 Where a SSM IPA application changes the ADR Vehicle Category from the original completed first-stage vehicle, then the SSM IPA must comply with all the ADRs applicable to the completed SSM Vehicle Category, as at the date of the issue of the SSM IPA, subject to 4.5 above.

6. ROAD VEHICLE DESCRIPTOR

6.1 Road Vehicle Descriptors (RVDs) are required for all SSM IPAs and should include all variants and options to be offered. The remarks section should include a brief description of the SSM additions/modifications, identifying the IPA and variant information of the completed first-stage vehicle.

7. VEHICLE IDENTIFICATION NUMBER

7.1 The Vehicle Identification Number (VIN) of the SSM vehicle shall be the same as the VIN of the first-stage vehicle.

8. DATE OF MANUFACTURE

8.1 The *Date of Manufacture* of the SSM vehicle shall be the date that it is completed and is in Australia in a condition that will enable it to be made available to the market.

issued by the

Administrator of Vehicle Standards

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Australian Motor Vehicle Certification Board

comprising Commonwealth, State and Territory representatives



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9. IDENTIFICATION PLATES

9.1 Following issue of an SSM IPA, the second-stage manufacturer will be able to affix a Second-Stage-of-Manufacture Identification Plate in addition to, and adjacent to the existing first-stage Identification Plate, as demonstration that the vehicle complies with the conditions of the SSM IPA.

9.2 SSM Identification Plates must be as per Circular 0-3-2. All SSM Identification Plates will be made available from a Contractor authorised to manufacture and supply Identification Plates, unless the second-stage manufacturer is authorised by the Administrator to supply their own Identification Plates. The SSM Identification Plate will include both VIN and *Date of Manufacture* as per 7.1 and 8.1 above respectively.

9.3 There is a prescribed fee payable to the Commonwealth for each SSM Identification Plate that is affixed to a vehicle. This fee is included within the supply of Identification Plates from the Contractor 9.2 above. Where the Administrator has authorised the SSM to supply their own Identification Plates the prescribed fee is to be paid directly to the Commonwealth. As at 1 November 2003 the prescribed fee is \$7.50 for each Identification Plate to be affixed to a SSM vehicle.

10. ARRANGEMENTS FOR SSM VEHICLES FITTED WITH ELECTRONIC STABILITY CONTROL (ESC) THAT HAVE BEEN SUBJECT TO A GROSS VEHICLE MASS (GVM) UPGRADE

10.1 Where a full volume IPA is being sought, a GVM upgrade SSM IPA holder will be permitted to use ESC test reports owned by other GVM upgrade SSM IPA holders for the same make and model, provided the test covers the variants to be supplied. Coverage of variants is to be demonstrated using a 'worst case' assessment and selection of fleet forms. Use of any test report must also be permitted by the test report owner.

10.2 Low volume GVM upgrades on vehicles with suspension lifts less than or equal to 50mm will not require testing of the ESC system. For suspension lifts exceeding 50mm, full ESC testing will be required.

10.3 For IPAs issued under the low volume scheme, numbers per Licensee for GVM upgrade are capped at 300 vehicles per annum per vehicle category and 100 vehicles per annum per IPA.

10.4 0-4-5 certificate submissions will not be required on low volume GVM upgrades where GVM upgrade is the only modification being undertaken under an SSM IPA.

10.5 Existing full volume IPA holders have the choice of converting their full volume IPAs to low volume IPAs. No application processing fees will apply to these IPA conversions.

10.6 Gross Combination Mass (GCM) must remain at the value set by the first stage manufacturer. Second stage manufacturers are not permitted to increase the GCM as part of an SSM IPA for GVM upgrade.

KENNA Allison

From: lightvehicles@infrastructure.gov.au
Sent: Friday, 15 June 2018 3:56 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Vehicle GCM Upgrades [SEC=UNCLASSIFIED]

Stuart, thanks for your enquiry.

Existing Approvals to upgrade the vehicle GVM remain current and are being reviewed by the Department. The Department does not issue an approval for increase in the GCM, where the approval is for a GVM increase only.

The intent of Circular 0-4-6 is such that the SSM is not to exceed the capacities set by the OEM.

[REDACTED]
MEngSC, BE (Mech)
Engineering – Vehicle Certification Technical Team
Vehicle Safety Standards - Surface Transport Policy
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601

www.infrastructure.gov.au

From: [REDACTED] <[\[REDACTED\]@explorex.com.au](mailto:[REDACTED]@explorex.com.au)>
Sent: Friday, 15 June 2018 11:06 AM
To: clientservice <clientservice@infrastructure.gov.au>
Subject: Vehicle GCM Upgrades

Good Morning

I am just emailing to try and get some clarification on vehicle GCM (gross combined mass) upgrades..... there has been some talk that GCM upgrades done on vehicles will cease after 1st of July 2018. Currently as I am aware it is possible that a vehicle GCM can be upgraded by certain 2nd stage manufactures (ie: Lovells suspension)..... for an example a Current series Ford Ranger can have it's GCM upgraded from 6000kg to 7000kg!

Your help in this matter would be greatly appreciated, thankyou.

Kind Regards

EXPLOREX CARAVANS

"Tougher By Design"

A: 66 Prestige Parade, Wangara WA 6065

ABN 12 703 268 490

 **BE GREEN!** Read from the screen



66 Prestige Parade, Wangara WA 6065
Phone : 08 9302 2295
stuart@explorex.com.au
www.explorex.com.au

Leave The Bitumen Behind..... Go Off-Road, Go Explorex !

KENNA Allison

From: [REDACTED]
Sent: Friday, 15 June 2018 3:37 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Circular 0-4-6 - In-service vehicle modifications based on SSM (Towing Capacity) [DLM=For-Official-Use-Only]

Wayne, a decision on existing approvals has not been made. The Circular is currently is applicable to only new applications or applications currently under process. There will be a review of existing approvals to establish the impact on the industry of these changes followed by consultation with State Transport authorities before a decision is made on the existing approvals.

[REDACTED]
MEngSC, BE (Mech)
Engineering – Vehicle Certification Technical Team
Vehicle Safety Standards - Surface Transport Policy
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601

www.infrastructure.gov.au

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From: [REDACTED]
Sent: Thursday, 14 June 2018 4:02 PM

Subject: Circular 0-4-6 - In-service vehicle modifications based on SSM (Towing Capacity)

Hello [REDACTED]

It's good to see that the [REDACTED] are supportive of the updates to Circular 0-4-6 –



Notification of Change to Administrative Arrangements Regarding GCM Re-Rating for Vehicles Which Have Undergone a Second-Stage-of-Manufacture



20th Nov 2018 10:30 AM

NEWS

The Australian Automotive Aftermarket Association (AAAA) & 4WD Industry Council have been notified by the Federal Department of Transport of a change in the administrative arrangements relating to modifications undertaken on a New Vehicle as part of a Second-Stage-of-Manufacture.

This change, which was issued via an updated Circular by the National Vehicle Administrator this week following consultation with all State and Territory Transport Regulators, effectively bans the practice of increasing the rated towing capacity of a vehicle, expressed as a Gross Combination Mass (GCM), above that specified by the first stage manufacturer.

This action was taken by the National Vehicle Administrator following the widespread concern expressed by regulators and aftermarket industry participants in relation to the potential safety implications of GCM re-rating and as such this change has the full support of the AAAA. Our support for this intervention is in line with our commitment as an industry to provide safe and responsible modifications through our many small and family owned automotive businesses across the country and for the thousands of Australian car owners potentially impacted by this practice.

Further information and a copy of the revised Administrator's circular can be found [HERE](#).

<https://www.4wdcouncil.com.au/notification-of-change-to-administrative-arrangements-regarding-gcm-re-rating-for-vehicles-which-have-undergone-a-second-stage-of-manufacture/>

I did try to contact [redacted] for more information on the Lovells Suspension products with the braked towing capacity increases but had not heard back from him... His message bank was full and I have not had an email response...

Now that the updated Circular 0-4-6 has been released, to help us map out a process to deal with local in-service mods with braked towing capacity increases that were based on SSM, is it likely that the Commonwealth will retrospectively withdraw the braked towing capacity increases for the Lovells Suspension products (IPA 40257 and IPA 46734)?

Regards

[redacted]
Vehicle Standards Officer, Road Safety and Compliance
Department of Infrastructure, Planning and Logistics
Northern Territory Government

Floor 2, Energy House, 18 Cavenagh Street, DARWIN, NT, 0800
GPO Box 2520, DARWIN, NT 0801

[redacted] www.nt.gov.au

W ... www.nt.gov.au

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KENNA Allison

From: clientservice
Sent: Friday, 15 June 2018 12:56 PM
To: [REDACTED]
Cc: clientservice
Subject: FW: Vehicle GCM Upgrades [SEC=UNCLASSIFIED]

Hi [REDACTED]

Please see the email below from Mr [REDACTED] that came into the client service in box today. Please action as appropriate and if you send a reply grateful if you can copy in clientservice@infrastructure.gov.au.

Happy to discuss
Many Thanks

[REDACTED]
Assistant Section Head | Governance Section
Communications, Parliamentary and Governance Branch | Corporate Services
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED] | www.infrastructure.gov.au

From: [REDACTED] <[REDACTED]@explorex.com.au>
Sent: Friday, 15 June 2018 11:06 AM
To: clientservice <clientservice@infrastructure.gov.au>
Subject: Vehicle GCM Upgrades

Good Morning

I am just emailing to try and get some clarification on vehicle GCM (gross combined mass) upgrades..... there has been some talk that GCM upgrades done on vehicles will cease after 1st of July 2018. Currently as I am aware it is possible that a vehicle GCM can be upgraded by certain 2nd stage manufactures (ie: Lovells suspension)..... for an example a Current series Ford Ranger can have it's GCM upgraded from 6000kg to 70000kg!

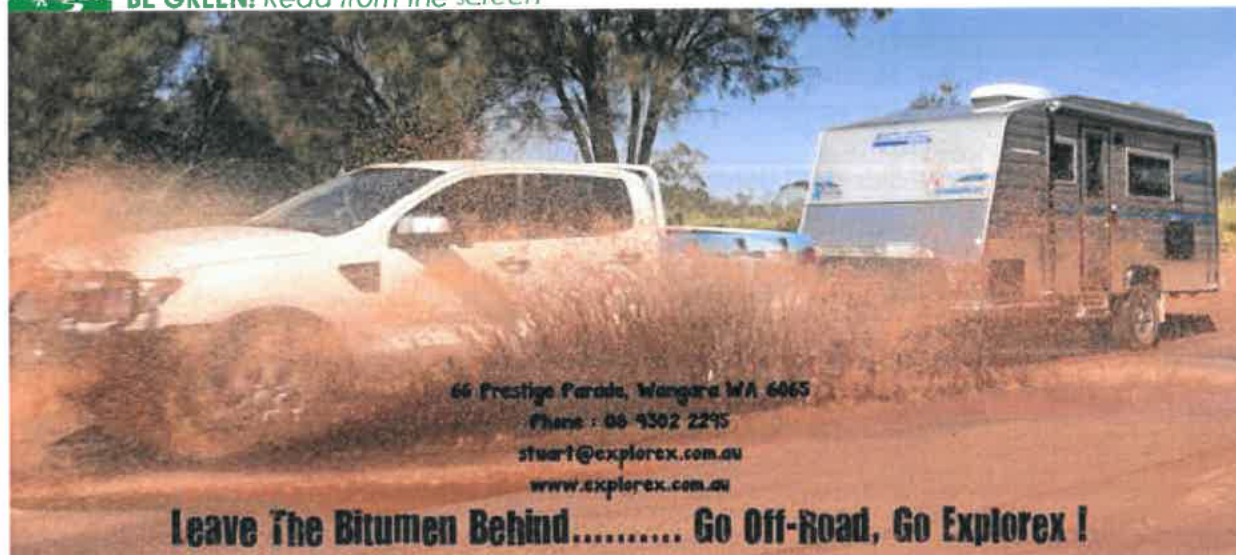
Your help in this matter would be greatly appreciated, thankyou.

Kind Regards

[REDACTED]
EXPLOREX CARAVANS
"Tougher By Design"

[REDACTED] explorex.com.au / W: www.explorex.com.au

 **BE GREEN!** Read from the screen



66 Prestige Parade, Wangara WA 6065
Phone : 08 9302 2295
stuart@explorex.com.au
www.explorex.com.au

Leave The Bitumen Behind..... Go Off-Road, Go Explorex !

KENNA Allison

From: [REDACTED]
Sent: Friday, 15 June 2018 12:53 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Circular 0-4-6 - In-service vehicle modifications based on SSM (Towing Capacity) [DLM=For-Official-Use-Only]

[REDACTED]

As discussed, please respond indicating that a decision on existing approvals has not been made. Circular currently is applicable to only new applications or applications currently under process. There will be a review of existing approvals to establish the impact on the industry of these changes followed by consultation with State Transport authorities before a decision is made on the existing approvals.

Regards

[REDACTED]

Director Certification and RAWS
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED]

[REDACTED]

This material contains information that, if disclosed inappropriately, may cause limited damage to national security, Australian Government agencies, commercial entities or members of the public. Recipients should ensure they handle and store this material appropriately.

From: [REDACTED]
Sent: Friday, 15 June 2018 10:47 AM

Subject: FW: Circular 0-4-6 - In-service vehicle modifications based on SSM (Towing Capacity) [DLM=For-Official-Use-Only]

[REDACTED]

Would you like me to respond to these enquiries? Or are you happy for us to respond?
Rgds
[REDACTED]

This material contains information that, if disclosed inappropriately, may cause limited damage to national security, Australian Government agencies, commercial entities or members of the public. Recipients should ensure they handle and store this material appropriately.

From: [REDACTED] <[REDACTED]@nt.gov.au>

Sent: Thursday, 14 June 2018 4:02 PM

Subject: Circular 0-4-6 - In-service vehicle modifications based on SSM (Towing Capacity)

Hello [REDACTED]

It's good to see that the [REDACTED] are supportive of the updates to Circular 0-4-6 –



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Notification of Change to Administrative Arrangements Regarding GCM Re-Rating for Vehicles Which Have Undergone a Second-Stage-of-Manufacture



JUNE 8, 2018 | 5:15 PM AEST

NEWS

The Australian Automotive Aftermarket Association (AAAA) & 4WD Industry Council have been notified by the Federal Department of Transport of a change in the administrative arrangements relating to modifications undertaken on a New Vehicle as part of a Second-Stage-of-Manufacture.

This change, which was issued via an updated Circular by the National Vehicle Administrator this week following consultation with all State and Territory Transport Regulators, effectively bans the practice of increasing the rated towing capacity of a vehicle, expressed as a Gross Combination Mass (GCM), above that specified by the first stage manufacturer.

This action was taken by the National Vehicle Administrator following the widespread concern expressed by regulators and aftermarket industry participants in relation to the potential safety implications of GCM re-rating and as such this change has the full support of the AAAA. Our support for this intervention is in line with our commitment as an industry to provide safe and responsible modifications through our many small and family owned automotive businesses across the country and for the thousands of Australian car owners potentially impacted by this practice.

Further information and a copy of the revised Administrators circular can be found [HERE](#).

<https://www.4wdcouncil.com.au/notification-of-change-to-administrative-arrangements-regarding-gcm-re-rating-for-vehicles-which-have-undergone-a-second-stage-of-manufacture/>

I did try to contact [REDACTED] for more information on the Lovells Suspension products with the braked towing capacity increases but had not heard back from him... His message bank was full and I have not had an email response...

Now that the updated Circular 0-4-6 has been released, to help us map out a process to deal with local in-service mods with braked towing capacity increases that were based on SSM, is it likely that the Commonwealth will retrospectively withdraw the braked towing capacity increases for the Lovells Suspension products (IPA 40257 and IPA 46734)?

Regards

[REDACTED]
Vehicle Standards Officer, Road Safety and Compliance
Department of Infrastructure, Planning and Logistics
Northern Territory Government

Floor 2, Energy House, 18 Cavenagh Street, DARWIN, NT, 0800
GPO Box 2520, DARWIN, NT 0801



W ... www.nt.gov.au

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KENNA Allison

From: lightvehicles@infrastructure.gov.au
Sent: Wednesday, 13 June 2018 3:21 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Attn: Administrator - Lovells Springs Administrator's Circular 0-4-6 Clarification - URGENT [SEC=UNCLASSIFIED]
Attachments: RN180610_01 - Lovells - RVCS 0-4-6 Response - FINAL.pdf
Importance: High

Please see the attached letter raising concerns over 0-4-6 from Finlays/Lovells

[REDACTED]
MEngSC, BE (Mech)
Engineering – Vehicle Certification Technical Team
Vehicle Safety Standards - Surface Transport Policy
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601

[REDACTED]
www.infrastructure.gov.au

From: [REDACTED]@findlay.net.au
Sent: Wednesday, 13 June 2018 12:22 PM
To: VCS ROADS <VCS.ROADS@infrastructure.gov.au>
[REDACTED]@findlay.net.au
Subject: Attn: Administrator - Lovells Springs Administrator's Circular 0-4-6 Clarification - URGENT
Importance: High

To The Administrator,

Please find attached a response letter from [REDACTED]
[REDACTED] addressing the recent publication of Administrator's Circular 0-4-6 Issue 4.

This letter outlines the concerns which Lovells have in regards to the addition of Section 10 in 0-4-6.

Given the impact of Circular 0-4-6 Issue 4 on Lovells' business, we would appreciate a prompt response to the requests for clarifications set out in this letter.

Of urgency is a response to the questions raised in Item 1 of the attached letter. We seek an immediate answer such that Lovells can advise their clients on this matter.

We look forward to responses to the other items raised in this letter as soon as possible.

REGARDS

[REDACTED]
Engineer

R. K. FINDLAY PTY LTD

Consulting Engineers

3/17 Pembury Rd, Minto NSW 2566

(PO Box 1052, Campbelltown NSW 2560)

 [.net.au](#)



RKF Ref: 180610_01

12th June 2018

Australian Government
Department of Infrastructure, Regional Development and Cities
Certification and RAWS Section
Vehicle Safety Standards Branch
GPO Box 594,
Canberra, ACT, 2601
Attention: The Administrator of Vehicle Standards

Dear Sir,

RE: Implementation of Administrator's Circulars 0-4-6

The recently implemented changes to Administrators Circular 0-4-6 have raised a number of concerns with our client, Lovells Springs, with regard to GVM upgrades including Towing Capacity and GCM upgrades. Below is some background to the development of the products and also a number of questions which require clarification. Answers to these questions will enable Lovells Springs to advise their clients of the implications of Circular 0-4-6 Issue 4, and to respond to the concerns their clients have expressed.

Given the impact of Circular 0-4-6 Issue 4 on Lovells' business, and on the many emergency services and other government and private organisations which depend on Lovells for fit-for-purpose vehicles, we would appreciate a prompt response to the requests for clarifications set out in this letter.

1.0 Background

R. K. Findlay Consulting Engineers (RKF) has been acting as the agent (A00005) for Lovells Springs Pty Ltd (Lovells) (L07545) with regards to Federal vehicle compliance. Lovells have numerous Second Stage Manufacture (SSM) approvals along with a small number of CRN approvals.

Lovells identified the requirement that many popular light commercial utility vehicles and popular off-road passenger vehicles need Gross Vehicle Mass (GVM) upgrades, Brake Towing Capacity (BTC) upgrades and Gross Combination Mass (GCM) upgrades to ensure the legal operation of these vehicles. As such, Lovells have become a leader in supplying these products to fleet operators and recreational enthusiasts.

Many light utility and 4x4 vehicles supplied by First Stage Original Equipment Manufacturers (OEM) have limited payload capacities due to high tare weights and low GVMS. This practice is continuing to increase as OEM vehicle tare weights increase due to ever increasing safety requirements. In addition to this, many trailer and caravan manufacturers are supplying products to market which have Aggregate Trailer Mass (ATM) at or above OEM vehicle limits.

As Lovells have undertaken their due diligence, RKF has been in contact with Vehicle Safety Standards (VSS) to discuss the process of compliance approval for SSM with GVM, BTC and GCM upgrades. During this process RKF detailed the following questions, in March 2015, regarding the approval process.

Hi [REDACTED]

Our customer Lovell's Springs is investigating the possibility of providing Brake Towing Capacity Increase as part of the SSM approvals currently held by Lovell's. Approval 40257 would be the focus of an initial application.

The first stage approval is 38469 which lists a maximum braked trailer mass of 3500kg. The proposal is to increase this to 3900kg provided satisfactory evidence is submitted.

Review of effected ADR's would require the following to justify the increase in braked trailer mass:

- ADR31/0_ or ADR35/0_ (As Applicable) - Testing of the tow vehicle parking brake system with trailer coupled on a 12% gradient
- ADR62/0_ - Testing/Calculation of Capacity of Towbar at increase load
- Revised RVD with increased towing capacity

I have reviewed the related circulars and ADR's and there is limited guidance on increase in towing capacity.

Could you please confirm if the above was submitted with appropriate supporting evidence that a braked towing capacity increase could be approved as part of an SSM IPA.

If this is easier to discuss by phone please give me a call on 0408 052 799.

I look forward to your reply.

To which [REDACTED] Assistant Director Light Vehicle Certification, responded on 26th March 2015 the following

Craig

As discussed earlier today, the vehicle in question requires updated evidence to show compliance to ADR 35/04. I will send a separate e-mail regarding this matter. In regards to this question, the GVM and brake trailer mass calculation are up to the manufacturer to determine.

The(n) (sic) path you have suggested will go some of the way to ensuring the vehicle is capable of these loads; however, it is up to the manufacturer to ensure that the vehicle and all possible towing variations can be operated within its design parameters.

Please don't hesitate to contact me if you require further information.

From this point Lovells and RKF proceeded to conduct ADR62/02 testing of the towbar and conduct ADR35/05 testing of the parking brake system of the vehicle for the vehicle and trailer combination. The tests were compiled in test reports and submitted as SE forms for approval 40257. These SE forms were then approved and noted on the IPA approval.

This process was also applied to Lovells approval 46734 as it is an identical vehicle to approval 40257, just a different vehicle category. It was also conducted on a different vehicle approval process as part of the initial SSM application and was approved and noted on IPA approval 48305.

After these approvals had been granted and Lovells had supplied these to market a number of state authorities questioned the IPA approvals with regards to SSM approvals with GVM, BTC and GCM upgrades. To clarify these issues RKF detailed the following questions, in August 2017, regarding the applicability of SSM manufacturer GVM, BTC and GCM upgrades. It was noted during this time that Road Vehicle Descriptor (RVD) were not to show or state any remarks regarding GCM as VSS does not approve GCM upgrades only GVM and BTC.

Hi [REDACTED]

With regards to the phone call on Monday 28/8/17.

We require clarification with regards to the definitions listed in the document [Vehicle Standard \(Australian Design Rule – Definitions and Vehicle Categories\) 2005](#) dated 14/5/2016.

Firstly the definition of "Manufacturer". The above document states the following

MANUFACTURER - the name of the person or company who accepts responsibility for compliance with the Australian Design Rules and to whom the 'Compliance Plate' approval certificate is issued.

Does this definition of "Manufacturer" encompass Second Stage Manufacturer?

The circular 0-4-6 *CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OF-MANUFACTURE* uses the term "Manufacturer" throughout. In particular it states the following in Clause 1.1

This Circular sets out the requirements for *Manufacturers* making application for Identification Plate Approval (IPA) for additions to, or modifications undertaken on a *New Vehicle* that already has affixed a completed vehicle Identification Plate. Such arrangements are identified as "Second-Stage-of-Manufacture" (SSM) IPA.

Secondly, if the definition of "Manufacturer" incorporates Second Stage Manufacturer how does this impact other definitions which are related to "Manufacturer"? Is it to be read that wherever the term "Manufacturer" is used, that this is taken to be the Second Stage Manufacturer, with regards to Second Stage Manufacturer IPAs?

An example of this is the following

The definition of Gross Vehicle Mass (GVM) is defined as follows

GROSS VEHICLE MASS (GVM) - the maximum laden mass of a motor vehicle as specified by the 'Manufacturer'.

Does the definition of GVM, and the fact that the definition of "Manufacturer" incorporates Second Stage Manufacturers, mean that the Second Stage Manufacturer can state a GVM above that of the First Stage Manufacturer? Does this mean that the Second Stage Manufacturer is ultimately responsible for the vehicles compliance to the relevant affected ADRs for a higher GVM?

Similarly the definition of Gross Combination Mass (GCM) is defined as follows:

GROSS COMBINATION MASS - value specified for the vehicle by the 'Manufacturer' as being the maximum of the sum of the 'Gross Vehicle Mass' of the drawing vehicle plus the sum of the 'Axle Loads' of any vehicle capable of being drawn as a trailer.

Does this definition mean that Second Stage Manufacturers can state a GCM above that of First Stage Manufacturers? Does this mean that the Second Stage Manufacturer is ultimately responsible for the vehicles compliance to the relevant affected ADRs for a higher GCM?

If you could please provide assistance with sourcing timely responses to these questions it would be greatly appreciated.

To which [REDACTED] Engineer Light Vehicle Certification, responded on 30th August 2017 the following

Clifford, with regard to your questions:

1. (*Vehicle Standard (Australian Design Rule – Definitions and Vehicle Categories) 2005*) Does this definition of "Manufacturer" encompass Second Stage Manufacturer?

Yes, the manufacturer is the person or company responsible for any modifications made to the base vehicle in relation to the SSM IPA Approval.

2. (0-4-6 *CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OF-MANUFACTURE*) Is it to be read that wherever the term "Manufacturer" is used, that this is taken to be the Second Stage Manufacturer, with regards to Second Stage Manufacturer IPAs?

0-4-6 references manufacturer in relation to modifications under the SSM IPA Approval.

3. Does this definition mean that Second Stage Manufacturers can state a GCM above that of First Stage Manufacturers?

From *Vehicle Standard (Australian Design Rule – Definitions and Vehicle Categories) 2005* dated 14/5/2016:

RATED TOWING CAPACITY - the lesser of either;

- The rating given to the towing equipment fitted to the motor vehicle or,
- The difference between 'Gross Combination Mass' and 'Gross Vehicle Mass'.

From this definition, the GCM should then be determined as no greater than the sum of Rated Towing Capacity and GVM.

Where an IPA has been approved for GVM increase as well as in some cases increased Rated Towing Capacity (braked trailer), GCM is a consequence of the modifications done under that approval and as such does not constitute an approval in its own right. GCM does not appear on approvals issued by the Department.

GCM is not generally provided by OEMs and is not a requirement on the SE forms for passenger vehicles.

4. Does this mean that the Second Stage Manufacturer is ultimately responsible for the vehicles compliance to the relevant affected ADRs for a higher GCM?

Yes, as changes made under the IPA will affect the GCM. GCM would also be subject to concepts such as 'fit for purpose' under legislation other than the Motor Vehicle Standards Act and this should be taken into consideration by the manufacturer.

From this point RKF advised Lovells, based on this response from VSS, that SSM manufacturers were able to upgrade BTC (via SSM approvals with evidence for the affected ADRs) and to upgrade GCM (as the MANUFACTURER). With regards to GCM upgrades, Lovells could conduct this so long as it was 'fit for purpose'.

Lovells have continued to manufacture and supply GVM, BTC and GCM upgrades for approvals 40257, 46734 and 48305 until June 2018.

2.0 Issues Requiring Clarification

As of June 2018 Administrator's Circular 0-4-6 Issue 4 has been released, which includes a new section 10 to address SSM approvals subjected to GVM upgrades. It appears that most of these sub clauses have been recommended by the aftermarket industry. Of most interest, to Lovells, is clause 10.6 which directly affects Lovells and their SSM approvals.

To correctly advise Lovells, RKF has some questions regarding Administrator's Circular 0-4-6, section 10 and sub clause 10.6. For ease of reference, these questions are numbered.

Item 1 Status of Existing SSM approvals incorporating BTC Upgrades

As mentioned in the background above, Lovells have three approvals, 40257, 46734, 48305 which all feature a BTC upgrade on a SSM GVM upgrade. Each of these was conducted by testing and supplying test reports and evidence for the affected ADRs of ADR62/02 and ADR35/05.

- Q1. Could VSS please outline the procedures regarding SSM approvals which have BTC upgrades and GCM upgrades above that of OEM approvals?
- Q2. How will Lovells be notified of the next step with regards to their SSM approvals?
- Q3. Can Lovells continue to plate vehicles under these approvals and fit them with GVM upgrade and BTC upgrade?
- Q4. Will the existing Lovells SSM approvals with BTC upgrades have their RVDs removed?
- Q5. What is the VSS response regarding currently registered vehicles plated under Lovells SSM with GVM and BTC upgrade?
- Q6. Will VSS issue a recall or are these vehicles fit for registration and operation?

Item 2 Circular 0-4-6 Implementation Date

It appears from social media posts and service bulletins from Lovells' competitors and other SSM manufacturers that 0-4-6 issue 4 had been in the public domain since 1st June 2018.

RKF did not received a copy until 6th June 2018 at a similar time Lovells obtained a copy via one of their fitters who was supplied it by one of Lovells' competitors.

It was not until 7th June 2018 that 0-4-6 issue 4 was made available on the RVCS website.

- Q7. Could VSS please advise the exact implementation date of Administrator's Circular 0-4-6?

Item 3 Consultation Process with IPA Holders

- Q8. Could VSS please explain the details of the consultation process?
- Q8.1 With which organisations and/or companies did VSS consult?
- Q8.2 Over what period did the consultation take place?
- Q8.3 Was the process that led to the review and update of Administrator's Circular 0-4-6 undertaken at the request of VSS, or other parties? If other parties, which parties?
- Q9. The [REDACTED] has stated that Administrator's Circular 0-4-6 was produced *"following the widespread concern expressed by regulators and aftermarket industry participants in relation to the potential safety implications of GCM re-rating"*. Could VSS provide information on the "potential safety implications"?
- Q10. Which sub clauses were recommended by the [REDACTED] and/or other industry representative bodies?
- Q11. Could VSS explain if there is any requirement for consultation with SSM IPA holders such as Lovells? Particularly as Lovells, a holder of IPA approvals (40257, 46734 and 48305) which have GVM upgrade with BTC upgrade approval is adversely affected by sub clause 10.6 of Administrator's Circular 0-4-6.

Item 4

As detailed previously in this letter, correspondence between Lovells, RKF and VSS has been open and well considered with regards to the procedure of SSM approvals with GVM upgrade and BTC upgrade. This has been a methodical process by RKF and Lovells to ensure all affected ADRs were addressed to ensure a fully compliant SSM vehicle was delivered to the Australian Market.

RKF and Lovells understand, through this correspondence with VSS, that VSS does not approve GCM upgrades. From this correspondence it was advised that the SSM holder is classed as the manufacturer and as such able to increase the GCM and take responsibility for the vehicle being fit for purpose.

It now appears that VSS is restricting trade by placing a stop on SSM GVM upgrade IPA holders from increasing towing capacity, despite ADR62 testing being conducted and evidence being submitted and approved.

- Q12. Could VSS please detail why SSM manufacturers are now no longer able to provide BTC upgrades under SSM GVM upgrade approvals?
- Q13. Could VSS please detail why SSM manufacturers are now no longer to state a new GCM, despite being the deemed as the "Manufacturer" as detailed in the email response from VSS?
- Q14. Why has VSS direction changed with regards to Manufacturers setting GCM limits?

Item 5 – 0-4-6 Category Definitions

With regards to the wording of Section 10 and sub clause 10.6 of 0-4-6 issue 4;

"10. ARRANGEMENTS FOR SSM LIGHT VEHICLES THAT HAVE BEEN SUBJECT TO A GROSS VEHICLE MASS (GVM) UPGRADE" and "10.6 The towing capacity of a light vehicle expressed as Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating must not exceed the value set by the first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade."

The definition of "Light Vehicles" is found in Section 4 of Vehicle Standard (Australian Design Rule – Definitions and Vehicle Categories) 2005 Compilation 9 (14/05/2016). In addition to this, Information Sheet 87 dated April 2017 states the following regarding light commercial and light passenger vehicles.

The Australian Design Rules (ADRs) define light commercial vehicles as Category NA vehicles: light goods vehicle with a GVM not exceeding 3.5 tonnes (for example, the Toyota Hilux or Ford Ranger).

Light passenger vehicles are motor vehicles constructed for the carriage of persons and contain less than 10 seats, excluding motorcycles (two and three wheeled vehicles) and buses (10 or more seats).

The ADRs define three light passenger vehicle categories:

Category MA, Category MB and Category MC.

RKF and Lovells wish to understand which vehicle categories are affected as Lovells have multiple SSM approvals across various vehicle categories.

Q15. Which vehicle categories are included in 0-4-6 section 10?

Item 6

With regards to sub clause 10.6 of 0-4-6 issue 4, Lovells and RKF seek clarification regarding the final sentence. The sentence in question is *"Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade."*

Q16. Does this sentence apply to all SSM IPA approvals which have undergone a GVM upgrade?

Q17. Or, since this sentence is embedded in sub clause 10.6 of Section 10 which is applied to "SSM LIGHT VEHICLES THAT HAVE BEEN SUBJECT TO A GROSS VEHICLE MASS (GVM) UPGRADE" does this sentence only apply to "Light Vehicles"?

Item 7 Vehicles subject to Category Change as part of SSM

As a number of Lovells SSM IPA approvals increase the GVM above 3500kg the SSM approval undertakes a category change relative to the OEM approval. With the category change, a number of Lovells SSM approvals are now no longer categorized as light vehicles.

Q18. Does the vehicle category used to define section 10 and sub clause 10.6 of 0-4-6 Issue 4 apply to the OEM IPA approval or the SSM IPA approval subject to GVM upgrade?

Item 8 RVD Format and GCM Information

With regards to sub clause 10.6 of 0-4-6 Issue 4, some OEM approvals do not publish, either in the owner's manual or the vehicle specification sheet, the GCM of the vehicle, only GVM and BTC.

Q19. Will VSS change the RVDs of light vehicles (NA, NB1, MA, MC) such that GCM is to be defined and noted?

Q20. With an OEM vehicle, where there is no published GCM, can a SSM GVM upgrade approval holder state a GCM as, the combination of OEM BTC and SSM GVM?

RKF and Lovells await a prompt response from VSS regarding the items listed above.

Regards,



Clifford Bollen
Engineer
MIEAust: 3121828



Craig Findlay
Mechanical Engineer
MIEAust: 1348607

KENNA Allison

From: [REDACTED]
Sent: Wednesday, 13 June 2018 2:58 PM
To: [REDACTED]
Subject: FW: VSSB MANAGEMENT BOARD paper GVM upgrades (002).docx
[SEC=UNCLASSIFIED]
Attachments: VSSB MANAGEMENT BOARD paper GVM upgrades (002).docx

[REDACTED]
MEngSC, BE (Mech)
Engineering – Vehicle Certification Technical Team
Vehicle Safety Standards - Surface Transport Policy
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601

[REDACTED] [w www.infrastructure.gov.au](http://www.infrastructure.gov.au)

From: [REDACTED]
Sent: Thursday, 22 March 2018 11:19 AM
To: [REDACTED]
Subject: VSSB MANAGEMENT BOARD paper GVM upgrades (002).docx [SEC=UNCLASSIFIED]

VSSB MANAGEMENT BOARD

No.	Date: 20/11/2017
<p>Define the issue:</p> <p>Clarity is required regarding the Department's definition of Gross Combination Mass (GCM) in relation to Original Equipment Manufacturers' (OEM) claimed maximum towing capacity and Gross Vehicle Mass (GVM). Manufacturers' websites claim a GCM that is at odds with the Department's definition.</p> <p><i>GROSS COMBINATION MASS - value specified for the vehicle by the 'Manufacturer' as being the maximum of the sum of the 'Gross Vehicle Mass' of the drawing vehicle plus the sum of the 'Axle Loads' of any vehicle capable of being drawn as a trailer.</i></p> <p>RATED TOWING CAPACITY - the lesser of either;</p> <ul style="list-style-type: none">- the rating given to the towing equipment fitted to the motor vehicle or,- the difference between 'Gross Combination Mass' and 'Gross Vehicle Mass' <p>This situation appears to create some concern and confusion for the vehicles' operators regarding the actual towing and load capability of their vehicle.</p> <p>Second Stage Manufacturers (SSM) supplying GVM upgrades are also unclear as to whether the installation of the GVM upgrade affects or increases the vehicle's GCM.</p>	
<p>Outline the current approach (if any):</p> <p>With the growth of the dual cab ute sector, manufacturers have been increasing braked towing capacity and are now claiming towing capacities up to 3500kg for their vehicles. The OEM websites are stating figures for GVM, rated towing and GCM. However the stated GCM is not in accordance with the Department's definition and often is 700-800 kg less than the sum of the GVM and rated towing capacity.</p> <p>The nett result is that to remain within the GCM as stated by the OEM, the effective payload of the vehicle must be reduced to remain with the GVM/GCM values, if the maximum towing capability is utilised.</p> <p>For example, the Ford Ranger states a towing capacity of 3500kgs GVM of 3200kg and a GCM of only 6000kgs. From the definition above, the Rated Towing Capacity should be (the lesser) difference between GCM and GVM, or 2800kg. This appears to be the situation for a lot of the manufacturers, where the 'true' towing capacity is less than that stated, unless they reduce the actual payload of the vehicle.</p> <p>Uncertainty or misunderstanding of the OEM requirements may lead to the operator overloading their vehicle with regard to the GCM.</p> <p>For light vehicles (MA, MC, N1) the manufacturer is not required to state the GCM on Summary of Evidence forms. The Department does not approve a second stage increase to a GCM – approval is given for an increase to GVM and towing capacity when the appropriate paperwork is submitted. In accordance with the Department's definitions, the GCM increase would be a consequence of a GVM upgrade and not an approval in its own right.</p> <p>The Department's definitions reference as <i>specified, recommended</i> etc. by 'the manufacture'.</p> <p>Administrator's Circular 0-4-6 – CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OF-MANUFACTURE – references the manufacturer in relation to modifications under the SSM IPA Approval. Therefore the manufacturer is the person or company responsible for any modifications made to the base vehicle in relation to the SSM IPA Approval. Under this definition, the SSM, as 'the manufacturer', should be able to state a revised GCM following the upgrade.</p> <p>Issues are arising when an SSM customer queries the SSM how the GVM upgrade affects their GCM – i.e. how the payload and towing capacity are affected and whether they will exceed the OEM GCM figures.</p>	
<p>Outline any legal or administrative constraints:</p> <p>Vehicles which have undergone an SSM are still required to meet state regulations and be 'fit for purpose'.</p>	

Decisions.

1. Engage OEMs to discuss GCM figures and implications on rated towing capacity and GVM
2. Develop guidance for SSMs to better understand definitions and implications of GVM upgrades.
3. Review ADR definitions to ensure accuracy in terms

Provide a Recommendation:

1. To develop procedures and guidelines to assist industry (OEM and SSM) for GVM upgrades.
2. To develop consumer information regarding GVM, towing capacity and the relationship to GCM.

KENNA Allison

From: [REDACTED]
Sent: Friday, 8 June 2018 5:46 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: 0-4-6 Document Title and Filename... [SEC=UNCLASSIFIED]

UNCLASSIFIED

[REDACTED]

Please fix the file name as suggested.

Regards

[REDACTED]

Sent with BlackBerry Work
(www.blackberry.com)

UNCLASSIFIED

From: [REDACTED]
Date: Friday, 08 Jun 2018, 5:14 pm
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: 0-4-6 Document Title and Filename... [SEC=UNCLASSIFIED]

FYI – suggestion from Anant.

From: Anant Z Bellary <Anant.Z.Bellary@tmr.qld.gov.au>
Sent: Friday, 8 June 2018 3:04 PM
To: [REDACTED]@infrastructure.gov.au; [REDACTED]@infrastructure.gov.au>
Cc: NYAKUENGAMA Sharon <Sharon.Nyakuengama@infrastructure.gov.au>
Subject: 0-4-6 Document Title and Filename...

Hello [REDACTED]

Thanks for publishing the revised Administrator's Circular 0-4-6.

I notice that that while the document title (CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OFMANUFACTURE) is correct, the file name (Circular-0-4-6-GVM-upgrade.pdf) may be slightly misleading, as the circular deals with all kinds of SSM, including those which result in GVM upgrade.

Something like "Circular-0-4-6.pdf" may be more appropriate.

Regards

Anant Bellary

Principal Engineer (Vehicle Standards & Accreditation) | Transport Regulation Branch
Customer Services, Safety and Regulation | Department of Transport and Main Roads

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Opinions contained in this email do not necessarily reflect the opinions of the Department of Transport and Main Roads, or endorsed organisations utilising the same infrastructure.

KENNA Allison

From: [REDACTED]
Sent: Friday, 8 June 2018 3:35 PM
To: [REDACTED]
Subject: RE: Admin Circular changes on web are live [SEC=UNCLASSIFIED]

UNCLASSIFIED

Thanks [REDACTED]

Sent with BlackBerry Work
(www.blackberry.com)

UNCLASSIFIED

From: [REDACTED]
Date: Friday, 08 Jun 2018, 1:33 pm
To: [REDACTED]
Subject: Admin Circular changes on web are live [SEC=UNCLASSIFIED]

Hi [REDACTED]

Web changes on Department site have gone live. I've written a message below to advise stakeholders. Apologies for the delay, I have been unwell.

The RVCS changes are still waiting to go live but the information is accessible on the Department site.
Cheers
[REDACTED]

Good afternoon,

The [latest news](#) from the Department of Infrastructure, Regional Development and Cities are the [Administrator's Circular changes](#):

1. [Circular 0-4-6](#) titled [Certification of Vehicles which have undergone a Second-Stage-of-Manufacture](#) has been amended to formalise current business practice for Approvals issued to GVM upgrade suspension manufacturers
And
2. [Circulars 0-2-13](#), [Certification of New Low Production Passenger Cars \(MA Category\)](#) has been amended to formalise current business practice for Approvals issued to boutique manufacturers under the LPPC scheme. The Circular grants exemptions from compliance to Pole side impact ADR 85; Esc and AEB requirements. The amended Circular also includes requirements for compliance to new ADRs that have been gazetted since the last issue.

Please take note of the changes made to these circulars.

Kind regards
[REDACTED]

[Redacted]
Communications Manager | Vehicle Safety Standards
Vehicle Import Coordination and Assessments | Surface Transport Policy
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[Redacted] w www.infrastructure.gov.au



KENNA Allison

From: [REDACTED]
Sent: Thursday, 7 June 2018 1:28 PM
To: [REDACTED]
Subject: FW: Issue of new Circular on second stage of Manufacture and LPPC Scheme [SEC=UNCLASSIFIED]
Attachments: Circular 0-4-6 GVM upgrade final.docx; 0-2-13_LPPC_final .docx

[REDACTED]
My apologies. I forgot to copy you in.

Regards
[REDACTED]

From: [REDACTED]
Sent: Thursday, 7 June 2018 1:27 PM

[REDACTED] orge
Subject: FW: Issue of new Circular on second stage of Manufacture and LPPC Scheme [SEC=UNCLASSIFIED]

Dear Team members

The Administrator has approved the following amended administrative Circulars.

- Circulars 0-2-13 on requirements for certification of vehicles supplied under Low Production Passenger Car Scheme and
- Circular 0-4-6 on requirements for certification of vehicles supplied under Second Stage Manufacture GVM upgrade.

Circular 0-4-6 has been amended to formalise current business practice for Approvals issued to GVM upgrade suspension manufacturers.

Circulars 0-2-13 has been amended to formalise current business practice for Approvals issued to boutique manufacturers under LPPC scheme. The Circular grants exemptions from compliance to Pole side impact ADR 85; Esc and AEB requirements. The amended Circular also includes requirements for compliance to new ADRs that have been gazetted since the last issue.

Congratulation to Technical team for finalisation of the attached Circulars.

Approvals team should be cautious in approving second stage RVDs and should ensure that second stage manufacturers are not permitted to increase the towing capacity of the original manufacturer. This will require additional checking. The relevant clause from circular is attached below:

10.6 The towing capacity of a light vehicle expressed as Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating must not exceed the value set by the first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade.

Regards

[Redacted]
Director Certification and RAWS
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601
[Redacted]



Issued by the

Administrator of Vehicle Standards

In consultation with the

Australian Motor Vehicle Certification Board

comprising Commonwealth, State and Territory representatives



Australian Government

Department of Infrastructure, Regional Development and Cities

CIRCULAR 0-4-6

CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OF-MANUFACTURE

1. INTRODUCTION

1.1 This Circular sets out the requirements for *Manufacturers* making application for Identification Plate Approval (IPA) for additions to, or modifications undertaken on a *New Vehicle* that already has affixed a completed vehicle Identification Plate. Such arrangements are identified as "Second-Stage-of-Manufacture" (SSM) IPA.

1.2 A further SSM arrangement can also apply to completed SSM vehicles. (For example, a completed *cab-chassis* may be modified to be dual-steer under SSM approval, and then that completed dual-steer *cab-chassis* vehicle may then have its GVM upgraded under a further SSM approval).

2. APPLICABILITY

2.1 SSM arrangements only apply to *New Vehicles* as defined in the *Motor Vehicle Standards Act 1989*, and do not apply to vehicles that have already been used in transport.

2.2 SSM arrangements apply to vehicle make/model types seeking IPA under the Full Volume arrangements, and also the concessionary evidence Low Volume arrangements.

2.3 Vehicles under the SSM IPA Low Volume arrangements are not subject to an eligibility ruling under the "Specialist and Enthusiast Vehicle Scheme (SEVS) Eligibility" as per Circular 0-2-12.

2.4 Arrangements for SSM do not apply to vehicles that are built on, or based on vehicle sub-assemblies/chassis that have been approved under Sub-Assembly Registration Number (SARN) arrangements as set out in Circular 0-4-23.

2.5 Arrangements for SSM do not apply to vehicles without an Identification Plate, such as a vehicle imported from overseas which has yet to be brought up to the National Standards. Such vehicles are subject to either the "Motor Vehicle Compliance Plate Approval" arrangements as per Circular 0-3-4, or the "Certification of Motor Vehicles Produced in Low Volume" requirements as per Circular 0-2-1.

2.6 Arrangements for SSM do not need to be used where the proposed modification can be done under the provisions of Vehicle Standards Bulletin (VSB) 6. However, where the proposed modifications are not within the scope of VSB6, SSM must be used.



3. APPLICATION FOR IDENTIFICATION PLATE APPROVAL

3.1 Applications for SSM IPA will only be accepted from a legal entity (Company or Individual, and not a business or trading name) that must first register as a Licensee on the Road Vehicle Certification System (RVCS), and have both the Production Facility and Design Facility similarly registered on RVCS thus being subject to "Conformity of Production" arrangements as per Circular 0-13-1.

3.2 Make and Model designation shall generally be in accordance with Circular 0-3-3 "Motor Vehicle Make and Model Designation".

3.2.1 The "Make-Model" designation must be unique from all other Identification Plate Approvals.

3.2.2 The "Make" of the SSM should comprise a prefix, representing the second-stage manufacturer, followed by the "Make" of the completed first-stage vehicle. For example:-

- A SSM modified "ALPHA", might be designated "ABC ALPHA".

3.2.3 The "Model" of the SSM should include qualification as to the SSM vehicle type. For example:-

- An SSM modified "ALPHA Beta", might be designated "ABC ALPHA Beta Ambulance", or "ABC ALPHA Beta Motorhome" as appropriate.

3.3 The SSM IPA arrangements are available to new vehicles subject to addition and/or modification, except where the nature of the addition and/or modification does not impact on the ADR certification of the first-stage vehicle, or when the impact is considered to be minor, and readily examined by the State/Territory registration authorities. Examples of additions/modifications considered to be of State/Territory responsibility are:-

- Where the original rearward facing lamp units of a new *chassis-cab* are relocated with the adding of an otherwise non-ADR impacting goods carrying body.
- Where the original external rear vision mirrors of a new *chassis-cab* are relocated to accommodate added goods carrying bodies of variable width.
- Where additional Side-Marker lamps are added to a commercial vehicle *chassis-cab*.
- Non-ADR-relevant body added to a commercial vehicle *chassis-cab*.
- A *heavy goods vehicle* wheelbase extension.

NOTE: Vehicle Standards Bulletin VSB.6, Heavy Vehicle Modifications, applies to modifications to heavy vehicles with a GVM greater than 4.5 tonnes, or heavy trailers with an ATM greater than 4.5 tonnes.

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3.4 Typical examples of modified new vehicles that should access these SSM arrangements are: -

- Light and Medium Goods vehicles subject to a Gross Vehicle Mass upgrade and/or a reduction in Lightly Laden Test Mass.
- Passenger vehicle cut and stretched to become a Limousine or Hearse.
- Vehicle subject to an engine/fuel type replacement or modification.
- Ambulance, Motorhome or Fire Tender body added to a *chassis-cab*.
- Vehicle modified to carry wheel-chair passengers or additional seats.
- Vehicles modified from one ADR vehicle category to another vehicle category.

3.5 There are specific requirements for campervans and motorhomes, including when certified under SSM arrangements. These requirements are set out in Circular 0-4-12 "Certification of Campervans and Motorhomes".

4. AUSTRALIAN DESIGN RULE EVIDENCE

4.1 Applications for SSM IPA must include an Application for Compliance Approval (Motor Vehicle) form, a Road Vehicle Descriptor, relevant Selection of Fleet submissions (SF forms) and resultant ADR evidence via RVCS, providing evidence of compliance with all ADRs applicable to the completed added to, or modified vehicle, and not solely evidence applicable to the second-stage work.

4.1.1 "Compliance Demonstrated Using SARN(s) (MV)" forms may be submitted to carry over evidence already provided within the first-stage completed vehicle Approval, if that evidence remains unaltered by the second-stage manufacture's additions and/or modifications. Certification responsibility for any carry-over ADR evidence remains with the holder of the first-stage IPA.

4.1.2 In submitting a "Compliance Demonstrated Using SARN(s)(MV)" form, the SSM makes a declaration that the ADR evidence to be carried over has been subject to appropriate examination attesting that it remains unaffected by the second-stage manufacture.

4.1.3 Where the second-stage manufacture has an indirect effect on the first-stage evidence, but the second-stage manufacturer can demonstrate that the tests conducted by the first-stage manufacturer would also cover the second-stage work satisfactorily, then for the purposes of seeking SSM IPA this ADR evidence can also be carried over.

4.2 Any additions and/or modifications to the original vehicle must be supported by evidence of ADR compliance, as appropriate, and in the form provided by: -

- Full Volume arrangements as per Circular 0-3-4 "Motor Vehicle Compliance Plate Approval", or
- As per Circular 0-2-1 "Certification of Motor Vehicles Produced in Low Volume".



4.3 Application for SSM IPA can only be based on one first-stage IPA, with a separate SSM application required for each different first-stage vehicle Approval. Accordingly, any carry over evidence, as per 4.1.1 above, can only reference the one first-stage Approval.

4.4 A SSM IPA can include multiple vehicle variants and multiple engines and other options included in the SSM RVD, as supported by the evidence of ADR compliance provided.

4.5 Applications for SSM IPA are expected to demonstrate compliance with all ADRs applicable as of the date of issue of the SSM IPA. However if a completed first-stage vehicle IPA does not yet include a new ADR introduced under transitional implementation arrangements, then the SSM may submit an SE blank-form, and make application for an exemption from that ADR by referencing this Circular 0-4-6 clause 4.5. If exemptions are granted, then the SE blank-form will be noted as **“Not Applicable”**, and details of the exemption will be included in Schedule 5 of the Approval. Where such exemptions are provided the applicability date of the ADR will be noted, and the Approval issued will be restricted to the due date of that ADR. When the exempted evidence is subsequently provided, the Approval will be reissued without this date restriction.

4.6 Circular 79/00-1-1 “Second-Stage-of-Manufacture Emissions Evidence where there is an increase in GVM” details the arrangements that apply for emissions ADRs.

5. CHANGE IN VEHICLE CATEGORY

5.1 Where a SSM IPA application changes the ADR Vehicle Category from the original completed first-stage vehicle, then the SSM IPA must comply with all the ADRs applicable to the completed SSM Vehicle Category, as at the date of the issue of the SSM IPA, subject to 4.5 above.

6. ROAD VEHICLE DESCRIPTOR

6.1 Road Vehicle Descriptors (RVDs) are required for all SSM IPAs and should include all variants and options to be offered. The remarks section should include a brief description of the SSM additions/modifications, identifying the IPA and variant information of the completed first-stage vehicle.

7. VEHICLE IDENTIFICATION NUMBER

7.1 The Vehicle Identification Number (VIN) of the SSM vehicle shall be the same as the VIN of the first-stage vehicle.

8. DATE OF MANUFACTURE

8.1 The *Date of Manufacture* of the SSM vehicle shall be the date that it is completed and is in Australia in a condition that will enable it to be made available to the market.

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9. IDENTIFICATION PLATES

9.1 Following issue of an SSM IPA, the second-stage manufacturer will be able to affix a Second-Stage-of-Manufacture Identification Plate in addition to, and adjacent to the existing first-stage Identification Plate, as demonstration that the vehicle complies with the conditions of the SSM IPA.

9.2 SSM Identification Plates must be as per Circular 0-3-2. All SSM Identification Plates will be made available from a Contractor authorised to manufacture and supply Identification Plates, unless the second-stage manufacturer is authorised by the Administrator to supply their own Identification Plates. The SSM Identification Plate will include both VIN and *Date of Manufacture* as per 7.1 and 8.1 above respectively.

9.3 There is a prescribed fee payable to the Commonwealth for each SSM Identification Plate that is affixed to a vehicle. This fee is included within the supply of Identification Plates from the Contractor 9.2 above. Where the Administrator has authorised the SSM to supply their own Identification Plates the prescribed fee is to be paid directly to the Commonwealth. As at 1 November 2003 the prescribed fee is \$7.50 for each Identification Plate to be affixed to a SSM vehicle.

10. ARRANGEMENTS FOR SSM LIGHT VEHICLES THAT HAVE BEEN SUBJECT TO A GROSS VEHICLE MASS (GVM) UPGRADE

10.1 Where a light vehicle is fitted with or is required to be fitted with Electronic Stability Control (ESC) system and a full volume SSM IPA is being sought, a GVM upgrade SSM IPA holder will be permitted to use ESC test reports owned by other GVM upgrade SSM IPA holders for the same make and model, provided the test covers the variants to be supplied. Coverage of variants is to be demonstrated using a 'worst case' assessment and selection of fleet forms. Use of any test report must also be permitted by the test report owner.

10.2 Low volume GVM upgrades on vehicles with suspension lifts less than or equal to 50mm will not require testing of the ESC system. For suspension lifts exceeding 50mm, full ESC testing will be required.

10.3 For SSM IPAs issued under the low volume scheme, numbers per Licensee for GVM upgrade are capped at 300 vehicles per annum per vehicle category and 100 vehicles per annum per SSM IPA.

10.4 0-4-5 certificate submissions will not be required on low volume GVM upgrades where GVM upgrade is the only modification being undertaken under an SSM IPA.

10.5 Existing full volume SSM IPA holders have the choice of converting their full volume SSM IPAs to low volume SSM IPAs. No application processing fees will apply to these SSM IPA conversions.

10.6 The towing capacity of a light vehicle expressed as Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating must not exceed the value set by the

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first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade.



Australian Government

Department of Infrastructure, Regional Development and Cities

From: [REDACTED]
Sent: Thursday, 7 June 2018 1:27 PM
To: [REDACTED]
Subject: FW: Issue of new Circular on second stage of Manufacture and LPPC Scheme [SEC=UNCLASSIFIED]
Attachments: Circular 0-4-6 GVM upgrade final.docx; 0-2-13_LPPC_final .docx

Dear Team members

The Administrator has approved the following amended administrative Circulars.

- Circulars 0-2-13 on requirements for certification of vehicles supplied under Low Production Passenger Car Scheme and
- Circular 0-4-6 on requirements for certification of vehicles supplied under Second Stage Manufacture GVM upgrade.

Circular 0-4-6 has been amended to formalise current business practice for Approvals issued to GVM upgrade suspension manufacturers.

Circulars 0-2-13 has been amended to formalise current business practice for Approvals issued to boutique manufacturers under LPPC scheme. The Circular grants exemptions from compliance to Pole side impact ADR 85; Esc and AEB requirements. The amended Circular also includes requirements for compliance to new ADRs that have been gazetted since the last issue.

Congratulation to Technical team for finalisation of the attached Circulars.

Approvals team should be cautious in approving second stage RVDs and should ensure that second stage manufacturers are not permitted to increase the towing capacity of the original manufacturer. This will require additional checking. The relevant clause from circular is attached below:

10.6 The towing capacity of a light vehicle expressed as Gross Combination Mass (GCM) rating or Rated Towing Capacity or Maximum Braked Towing Mass rating must not exceed the value set by the first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade.

Regards

[REDACTED]
 Director Certification and RAWS
 Vehicle Safety Standards Branch | Surface Transport Policy Division
 Department of Infrastructure, Regional Development and Cities
 GPO Box 594, Canberra ACT 2601

Issued by the

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Australian Government

Department of Infrastructure, Regional Development and Cities

CIRCULAR 0-4-6

CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OF-MANUFACTURE

1. INTRODUCTION

1.1 This Circular sets out the requirements for *Manufacturers* making application for Identification Plate Approval (IPA) for additions to, or modifications undertaken on a *New Vehicle* that already has affixed a completed vehicle Identification Plate. Such arrangements are identified as “Second-Stage-of-Manufacture” (SSM) IPA.

1.2 A further SSM arrangement can also apply to completed SSM vehicles. (For example, a completed *cab-chassis* may be modified to be dual-steer under SSM approval, and then that completed dual-steer *cab-chassis* vehicle may then have its GVM upgraded under a further SSM approval).

2. APPLICABILITY

2.1 SSM arrangements only apply to *New Vehicles* as defined in the *Motor Vehicle Standards Act 1989*, and do not apply to vehicles that have already been used in transport.

2.2 SSM arrangements apply to vehicle make/model types seeking IPA under the Full Volume arrangements, and also the concessionary evidence Low Volume arrangements.

2.3 Vehicles under the SSM IPA Low Volume arrangements are not subject to an eligibility ruling under the “Specialist and Enthusiast Vehicle Scheme (SEVS) Eligibility” as per Circular 0-2-12.

2.4 Arrangements for SSM do not apply to vehicles that are built on, or based on vehicle sub-assemblies/chassis that have been approved under Sub-Assembly Registration Number (SARN) arrangements as set out in Circular 0-4-23.

2.5 Arrangements for SSM do not apply to vehicles without an Identification Plate, such as a vehicle imported from overseas which has yet to be brought up to the National Standards. Such vehicles are subject to either the “Motor Vehicle Compliance Plate Approval” arrangements as per Circular 0-3-4, or the “Certification of Motor Vehicles Produced in Low Volume” requirements as per Circular 0-2-1.

2.6 Arrangements for SSM do not need to be used where the proposed modification can be done under the provisions of Vehicle Standards Bulletin (VSB) 6. However, where the proposed modifications are not within the scope of VSB6, SSM must be used.



3. APPLICATION FOR IDENTIFICATION PLATE APPROVAL

3.1 Applications for SSM IPA will only be accepted from a legal entity (Company or Individual, and not a business or trading name) that must first register as a Licensee on the Road Vehicle Certification System (RVCS), and have both the Production Facility and Design Facility similarly registered on RVCS thus being subject to "Conformity of Production" arrangements as per Circular 0-13-1.

3.2 Make and Model designation shall generally be in accordance with Circular 0-3-3 "Motor Vehicle Make and Model Designation".

3.2.1 The "Make-Model" designation must be unique from all other Identification Plate Approvals.

3.2.2 The "Make" of the SSM should comprise a prefix, representing the second-stage manufacturer, followed by the "Make" of the completed first-stage vehicle. For example:-

- A SSM modified "ALPHA", might be designated "ABC ALPHA".

3.2.3 The "Model" of the SSM should include qualification as to the SSM vehicle type. For example:-

- An SSM modified "ALPHA Beta", might be designated "ABC ALPHA Beta Ambulance", or "ABC ALPHA Beta Motorhome" as appropriate.

3.3 The SSM IPA arrangements are available to new vehicles subject to addition and/or modification, except where the nature of the addition and/or modification does not impact on the ADR certification of the first-stage vehicle, or when the impact is considered to be minor, and readily examined by the State/Territory registration authorities. Examples of additions/modifications considered to be of State/Territory responsibility are:-

- Where the original rearward facing lamp units of a new *chassis-cab* are relocated with the adding of an otherwise non-ADR impacting goods carrying body.
- Where the original external rear vision mirrors of a new *chassis-cab* are relocated to accommodate added goods carrying bodies of variable width.
- Where additional Side-Marker lamps are added to a commercial vehicle *chassis-cab*.
- Non-ADR-relevant body added to a commercial vehicle *chassis-cab*.
- A *heavy goods vehicle* wheelbase extension.

NOTE: Vehicle Standards Bulletin VSB.6, Heavy Vehicle Modifications, applies to modifications to heavy vehicles with a GVM greater than 4.5 tonnes, or heavy trailers with an ATM greater than 4.5 tonnes.



3.4 Typical examples of modified new vehicles that should access these SSM arrangements are: -

- Light and Medium Goods vehicles subject to a Gross Vehicle Mass upgrade and/or a reduction in Lightly Laden Test Mass.
- Passenger vehicle cut and stretched to become a Limousine or Hearse.
- Vehicle subject to an engine/fuel type replacement or modification.
- Ambulance, Motorhome or Fire Tender body added to a *chassis-cab*.
- Vehicle modified to carry wheel-chair passengers or additional seats.
- Vehicles modified from one ADR vehicle category to another vehicle category.

3.5 There are specific requirements for campervans and motorhomes, including when certified under SSM arrangements. These requirements are set out in Circular 0-4-12 "Certification of Campervans and Motorhomes".

4. AUSTRALIAN DESIGN RULE EVIDENCE

4.1 Applications for SSM IPA must include an Application for Compliance Approval (Motor Vehicle) form, a Road Vehicle Descriptor, relevant Selection of Fleet submissions (SF forms) and resultant ADR evidence via RVCS, providing evidence of compliance with all ADRs applicable to the completed added to, or modified vehicle, and not solely evidence applicable to the second-stage work.

4.1.1 "Compliance Demonstrated Using SARN(s) (MV)" forms may be submitted to carry over evidence already provided within the first-stage completed vehicle Approval, if that evidence remains unaltered by the second-stage manufacture's additions and/or modifications. Certification responsibility for any carry-over ADR evidence remains with the holder of the first-stage IPA.

4.1.2 In submitting a "Compliance Demonstrated Using SARN(s)(MV)" form, the SSM makes a declaration that the ADR evidence to be carried over has been subject to appropriate examination attesting that it remains unaffected by the second-stage manufacture.

4.1.3 Where the second-stage manufacture has an indirect effect on the first-stage evidence, but the second-stage manufacturer can demonstrate that the tests conducted by the first-stage manufacturer would also cover the second-stage work satisfactorily, then for the purposes of seeking SSM IPA this ADR evidence can also be carried over.

4.2 Any additions and/or modifications to the original vehicle must be supported by evidence of ADR compliance, as appropriate, and in the form provided by: -

- Full Volume arrangements as per Circular 0-3-4 "Motor Vehicle Compliance Plate Approval", or
- As per Circular 0-2-1 "Certification of Motor Vehicles Produced in Low Volume".



4.3 Application for SSM IPA can only be based on one first-stage IPA, with a separate SSM application required for each different first-stage vehicle Approval. Accordingly, any carry over evidence, as per 4.1.1 above, can only reference the one first-stage Approval.

4.4 A SSM IPA can include multiple vehicle variants and multiple engines and other options included in the SSM RVD, as supported by the evidence of ADR compliance provided.

4.5 Applications for SSM IPA are expected to demonstrate compliance with all ADRs applicable as of the date of issue of the SSM IPA. However if a completed first-stage vehicle IPA does not yet include a new ADR introduced under transitional implementation arrangements, then the SSM may submit an SE blank-form, and make application for an exemption from that ADR by referencing this Circular 0-4-6 clause 4.5. If exemptions are granted, then the SE blank-form will be noted as **"Not Applicable"**, and details of the exemption will be included in Schedule 5 of the Approval. Where such exemptions are provided the applicability date of the ADR will be noted, and the Approval issued will be restricted to the due date of that ADR. When the exempted evidence is subsequently provided, the Approval will be reissued without this date restriction.

4.6 Circular 79/00-1-1 "Second-Stage-of-Manufacture Emissions Evidence where there is an increase in GVM" details the arrangements that apply for emissions ADRs.

5. CHANGE IN VEHICLE CATEGORY

5.1 Where a SSM IPA application changes the ADR Vehicle Category from the original completed first-stage vehicle, then the SSM IPA must comply with all the ADRs applicable to the completed SSM Vehicle Category, as at the date of the issue of the SSM IPA, subject to 4.5 above.

6. ROAD VEHICLE DESCRIPTOR

6.1 Road Vehicle Descriptors (RVDs) are required for all SSM IPAs and should include all variants and options to be offered. The remarks section should include a brief description of the SSM additions/modifications, identifying the IPA and variant information of the completed first-stage vehicle.

7. VEHICLE IDENTIFICATION NUMBER

7.1 The Vehicle Identification Number (VIN) of the SSM vehicle shall be the same as the VIN of the first-stage vehicle.

8. DATE OF MANUFACTURE

8.1 The *Date of Manufacture* of the SSM vehicle shall be the date that it is completed and is in Australia in a condition that will enable it to be made available to the market.



9. IDENTIFICATION PLATES

9.1 Following issue of an SSM IPA, the second-stage manufacturer will be able to affix a Second-Stage-of-Manufacture Identification Plate in addition to, and adjacent to the existing first-stage Identification Plate, as demonstration that the vehicle complies with the conditions of the SSM IPA.

9.2 SSM Identification Plates must be as per Circular 0-3-2. All SSM Identification Plates will be made available from a Contractor authorised to manufacture and supply Identification Plates, unless the second-stage manufacturer is authorised by the Administrator to supply their own Identification Plates. The SSM Identification Plate will include both VIN and *Date of Manufacture* as per 7.1 and 8.1 above respectively.

9.3 There is a prescribed fee payable to the Commonwealth for each SSM Identification Plate that is affixed to a vehicle. This fee is included within the supply of Identification Plates from the Contractor 9.2 above. Where the Administrator has authorised the SSM to supply their own Identification Plates the prescribed fee is to be paid directly to the Commonwealth. As at 1 November 2003 the prescribed fee is \$7.50 for each Identification Plate to be affixed to a SSM vehicle.

10. ARRANGEMENTS FOR SSM LIGHT VEHICLES THAT HAVE BEEN SUBJECT TO A GROSS VEHICLE MASS (GVM) UPGRADE

10.1 Where a light vehicle is fitted with or is required to be fitted with Electronic Stability Control (ESC) system and a full volume SSM IPA is being sought, a GVM upgrade SSM IPA holder will be permitted to use ESC test reports owned by other GVM upgrade SSM IPA holders for the same make and model, provided the test covers the variants to be supplied. Coverage of variants is to be demonstrated using a 'worst case' assessment and selection of fleet forms. Use of any test report must also be permitted by the test report owner.

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first stage manufacturer. Second stage manufacturers are not permitted to increase the towing capacity as part of an SSM IPA that results in GVM upgrade.



Australian Government

Department of Infrastructure, Regional Development and Cities

KENNA Allison

From: [REDACTED]
Sent: Wednesday, 6 June 2018 5:10 PM
To: [REDACTED]
Subject: FW: SSM approvals and GCM ratings [SEC=UNCLASSIFIED]

[REDACTED]

As discussed, please send the copy of issued Circular.

Regards

[REDACTED]

Director Certification and RAWs
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED]

From: joe@customvehicleservices.com.au <joe@customvehicleservices.com.au>
Sent: Tuesday, 5 June 2018 9:34 PM
To: [REDACTED]
Subject: SSM approvals and GCM ratings

Hi [REDACTED]

Can you please advise if there are changes on the table for SSM approvals regarding GVM / GCM / Towed mass.

There has been a large amount of conversation on social media about this with people citing they were advised by RVCS and also posting extract of draft documents of which I have heard nothing nor been advised of any changes.

As a holder of several SSM approvals I would expect to see some sort of consultation if there were changes on the horizon yet I have heard nothing.

Below is a copy of what has been shown online. Is this something that is to be issued? This will have a massive impact both on my SSM approvals and the SSM approvals that I act as an agent for other companies.

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Regards

Joseph Butterworth

Custom Vehicle Services

PO Box 1309

Coolum Beach, 4573

Queensland

Australia

<https://www.facebook.com/customvehicleservices/>



KENNA Allison

From: lightvehicles@infrastructure.gov.au
Sent: Wednesday, 6 June 2018 2:32 PM
To: 'joe@customvehicleservices.com.au'
Subject: RE: SSM approvals and GCM ratings [SEC=UNCLASSIFIED]

This is the final version as provided by [REDACTED] It has been forwarded to the FCAI and is waiting for publication on our website.

[REDACTED]
MEngSC, BE (Mech)
Engineering – Vehicle Certification Technical Team
Vehicle Safety Standards - Surface Transport Policy
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601

[REDACTED] w www.infrastructure.gov.au

From: joe@customvehicleservices.com.au
Sent: Wednesday, 6 June 2018 2:17 PM
To: lightvehicles@infrastructure.gov.au
[REDACTED]
Subject: RE: SSM approvals and GCM ratings [SEC=UNCLASSIFIED]

Is this a draft or has it been approved?

Regards
Joe

From: Lightvehicles@infrastructure.gov.au <Lightvehicles@infrastructure.gov.au>
Sent: Wednesday, 6 June 2018 2:13 PM
To: joe@customvehicleservices.com.au

[REDACTED]
Subject: RE: SSM approvals and GCM ratings [SEC=UNCLASSIFIED]

Joe, the updated Circular 0-4-6 is attached, this has been released for distribution and we are waiting for our web services to publish this.

[REDACTED]
MEngSC, BE (Mech)
Engineering – Vehicle Certification Technical Team
Vehicle Safety Standards - Surface Transport Policy
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601

From: S [REDACTED]
Sent: Wednesday, 6 June 2018 1:53 PM
To: [REDACTED]
Subject: FW: SSM approvals and GCM ratings [SEC=UNCLASSIFIED]

[REDACTED]

Please respond.

Regards

[REDACTED]

Director Certification and RAWs
Vehicle Safety Standards Branch | Surface Transport Policy Division
Department of Infrastructure, Regional Development and Cities
GPO Box 594, Canberra ACT 2601

[REDACTED]

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Joseph Butterworth

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Disclaimer

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or entities other than the intended recipient is prohibited and may result in severe penalties.

If you have received this e-mail in error, please notify the Department on (02) 6274-7111
and delete all copies of this transmission together with any attachments.

KENNA Allison

From: heavyvehicles@infrastructure.gov.au
Sent: Wednesday, 6 June 2018 2:13 PM
To: craig@findlay.net.au
Cc: [REDACTED]
Subject: RE: Second Stage Manufacture - Clarification of Policy on Towing Capacity and proposed changes to Circular 0-4-6 [SEC=UNCLASSIFIED]
Attachments: Circular 0-4-6 GVM upgrade final.docx

Craig, the updated Circular 0-4-6 is attached, this has been released for distribution and we are waiting for our web services to publish this.

[REDACTED]
MEngSC, BE (Mech)
Engineering – Vehicle Certification Technical Team
Vehicle Safety Standards - Surface Transport Policy
Department of Infrastructure and Regional Development
GPO Box 594, Canberra ACT 2601

[REDACTED] www.infrastructure.gov.au

From: VCS ROADS
Sent: Wednesday, 6 June 2018 9:37 AM
To: heavyvehicles@infrastructure.gov.au; lightvehicles@infrastructure.gov.au
Subject: FW: Second Stage Manufacture - Clarification of Policy on Towing Capacity and proposed changes to Circular 0-4-6 [SEC=UNCLASSIFIED]

From: Craig Findlay. <craig@findlay.net.au>
Sent: Wednesday, 6 June 2018 6:59 AM

Cc: VCS ROADS <VCS.ROADS@infrastructure.gov.au>; info@findlay.net.au
Subject: Second Stage Manufacture - Clarification of Policy on Towing Capacity and proposed changes to Circular 0-4-6

Good Morning [REDACTED]

As discussed briefly by phone yesterday,

One of our clients is heavily involved in the GVM upgrade market of vehicles in the MC, NA & NB category, this work has also included a number of products to increase the towing capacity of selected vehicles to meet a significant requirement in the market.

We have assisted in the development of these products including testing and submission of the relevant SE forms.

We have been made aware that changes to Circular 0-4-6 are being proposed, this was brought to our attention through a release from a competitor to our client dated 5/6/2018 which stated:

I am pleased to advise that today DOTARS (Federal Department of Infrastructure and Transport) have issued circular 0-4-6 which clearly states that GCM upgrades are NOT allowed as below.

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We have searched through the circular listing and have not be able to locate any reference to a revision of circular 0-4-6.

It is our understanding that at this point the requirements for SSM are as published on the RVCS webs site in CIRCULAR 0-4-6 Issue 3 dated February 2004.

We are seeking clarification of the proposed changes to SSM requirements and circular 0-4-6 and we request a copy of this document under the Freedom of Information Act.

If these proposed changes are coming into place it has significant commercial ramifications for our client for both current products and products under development and we need to advise them immediately.

If you would like to discuss please give me a call on 0408 052 799

Regards

Craig Findlay
Mechanical Engineer

R. K. FINDLAY PTY LTD
CONSULTING ENGINEERS
3/17 Pembury Rd, Minto NSW 2566
(PO Box 1052 Campbelltown NSW 2560)
P. 02 9824 5140 F. 02 9824 5142
E: craig@findlay.net.au

KENNA Allison

From: [REDACTED]
Sent: Wednesday, 6 June 2018 1:52 PM
To: [REDACTED]
Subject: Fw: Issue of new Circular on second stage of Manufacture and LPPC Scheme [SEC=UNCLASSIFIED]
Attachments: Circular 0-4-6 GVM upgrade final.docx; 0-2-13_LPPC_final .docx

From: S [REDACTED]
Sent: Tuesday, 5 June 2018 9:49 AM
To: [REDACTED]
Cc: WHATSON Alison
Subject: Issue of new Circular on second stage of Manufacture and LPPC Scheme [SEC=UNCLASSIFIED]

James

The Administrator has approved the following amended administrative Circulars.

- Circulars 0-2-13 on requirements for certification of vehicles supplied under Low Production Passenger Car Scheme and
- Circular 0-4-6 on requirements for certification of vehicles supplied under Second Stage Manufacture GVM upgrade.

Circular 0-4-6 has been amended to formalise current business practice for Approvals issued to GVM upgrade suspension manufacturers.

Circulars 0-2-13 has been amended to formalise current business practice for Approvals issued to boutique manufacturers under LPPC scheme. The Circular grants exemptions from compliance to Pole side impact ADR 85; Esc and AEB requirements. The amended Circular also includes requirements for compliance to new ADRs that have been gazetted since the last issue.

Please circulate these to your members and these will be also available for download from our website.

Regards

[REDACTED]
 Director Certification and RAWS
 Vehicle Safety Standards Branch | Surface Transport Policy Division
 Department of Infrastructure, Regional Development and Cities
 GPO Box 594, Canberra ACT 2601

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CIRCULAR 0-4-6

CERTIFICATION OF VEHICLES WHICH HAVE UNDERGONE A SECOND-STAGE-OF-MANUFACTURE

1. INTRODUCTION

1.1 This Circular sets out the requirements for *Manufacturers* making application for Identification Plate Approval (IPA) for additions to, or modifications undertaken on a *New Vehicle* that already has affixed a completed vehicle Identification Plate. Such arrangements are identified as "Second-Stage-of-Manufacture" (SSM) IPA.

1.2 A further SSM arrangement can also apply to completed SSM vehicles. (For example, a completed *cab-chassis* may be modified to be dual-steer under SSM approval, and then that completed dual-steer *cab-chassis* vehicle may then have its GVM upgraded under a further SSM approval).

2. APPLICABILITY

2.1 SSM arrangements only apply to *New Vehicles* as defined in the *Motor Vehicle Standards Act 1989*, and do not apply to vehicles that have already been used in transport.

2.2 SSM arrangements apply to vehicle make/model types seeking IPA under the Full Volume arrangements, and also the concessionary evidence Low Volume arrangements.

2.3 Vehicles under the SSM IPA Low Volume arrangements are not subject to an eligibility ruling under the "Specialist and Enthusiast Vehicle Scheme (SEVS) Eligibility" as per Circular 0-2-12.

2.4 Arrangements for SSM do not apply to vehicles that are built on, or based on vehicle sub-assemblies/chassis that have been approved under Sub-Assembly Registration Number (SARN) arrangements as set out in Circular 0-4-23.

2.5 Arrangements for SSM do not apply to vehicles without an Identification Plate, such as a vehicle imported from overseas which has yet to be brought up to the National Standards. Such vehicles are subject to either the "Motor Vehicle Compliance Plate Approval" arrangements as per Circular 0-3-4, or the "Certification of Motor Vehicles Produced in Low Volume" requirements as per Circular 0-2-1.

2.6 Arrangements for SSM do not need to be used where the proposed modification can be done under the provisions of Vehicle Standards Bulletin (VSB) 6. However, where the proposed modifications are not within the scope of VSB6, SSM must be used.



3. APPLICATION FOR IDENTIFICATION PLATE APPROVAL

3.1 Applications for SSM IPA will only be accepted from a legal entity (Company or Individual, and not a business or trading name) that must first register as a Licensee on the Road Vehicle Certification System (RVCS), and have both the Production Facility and Design Facility similarly registered on RVCS thus being subject to "Conformity of Production" arrangements as per Circular 0-13-1.

3.2 Make and Model designation shall generally be in accordance with Circular 0-3-3 "Motor Vehicle Make and Model Designation".

3.2.1 The "Make-Model" designation must be unique from all other Identification Plate Approvals.

3.2.2 The "Make" of the SSM should comprise a prefix, representing the second-stage manufacturer, followed by the "Make" of the completed first-stage vehicle. For example:-

- A SSM modified "ALPHA", might be designated "ABC ALPHA".

3.2.3 The "Model" of the SSM should include qualification as to the SSM vehicle type. For example:-

- An SSM modified "ALPHA Beta", might be designated "ABC ALPHA Beta Ambulance", or "ABC ALPHA Beta Motorhome" as appropriate.

3.3 The SSM IPA arrangements are available to new vehicles subject to addition and/or modification, except where the nature of the addition and/or modification does not impact on the ADR certification of the first-stage vehicle, or when the impact is considered to be minor, and readily examined by the State/Territory registration authorities. Examples of additions/modifications considered to be of State/Territory responsibility are:-

- Where the original rearward facing lamp units of a new *chassis-cab* are relocated with the adding of an otherwise non-ADR impacting goods carrying body.
- Where the original external rear vision mirrors of a new *chassis-cab* are relocated to accommodate added goods carrying bodies of variable width.
- Where additional Side-Marker lamps are added to a commercial vehicle *chassis-cab*.
- Non-ADR-relevant body added to a commercial vehicle *chassis-cab*.
- A *heavy goods vehicle* wheelbase extension.

NOTE: Vehicle Standards Bulletin VSB.6, Heavy Vehicle Modifications, applies to modifications to heavy vehicles with a GVM greater than 4.5 tonnes, or heavy trailers with an ATM greater than 4.5 tonnes.



3.4 Typical examples of modified new vehicles that should access these SSM arrangements are: -

- Light and Medium Goods vehicles subject to a Gross Vehicle Mass upgrade and/or a reduction in Lightly Laden Test Mass.
- Passenger vehicle cut and stretched to become a Limousine or Hearse.
- Vehicle subject to an engine/fuel type replacement or modification.
- Ambulance, Motorhome or Fire Tender body added to a *chassis-cab*.
- Vehicle modified to carry wheel-chair passengers or additional seats.
- Vehicles modified from one ADR vehicle category to another vehicle category.

3.5 There are specific requirements for campervans and motorhomes, including when certified under SSM arrangements. These requirements are set out in Circular 0-4-12 "Certification of Campervans and Motorhomes".

4. AUSTRALIAN DESIGN RULE EVIDENCE

4.1 Applications for SSM IPA must include an Application for Compliance Approval (Motor Vehicle) form, a Road Vehicle Descriptor, relevant Selection of Fleet submissions (SF forms) and resultant ADR evidence via RVCS, providing evidence of compliance with all ADRs applicable to the completed added to, or modified vehicle, and not solely evidence applicable to the second-stage work.

4.1.1 "Compliance Demonstrated Using SARN(s) (MV)" forms may be submitted to carry over evidence already provided within the first-stage completed vehicle Approval, if that evidence remains unaltered by the second-stage manufacture's additions and/or modifications. Certification responsibility for any carry-over ADR evidence remains with the holder of the first-stage IPA.

4.1.2 In submitting a "Compliance Demonstrated Using SARN(s)(MV)" form, the SSM makes a declaration that the ADR evidence to be carried over has been subject to appropriate examination attesting that it remains unaffected by the second-stage manufacture.

4.1.3 Where the second-stage manufacture has an indirect effect on the first-stage evidence, but the second-stage manufacturer can demonstrate that the tests conducted by the first-stage manufacturer would also cover the second-stage work satisfactorily, then for the purposes of seeking SSM IPA this ADR evidence can also be carried over.

4.2 Any additions and/or modifications to the original vehicle must be supported by evidence of ADR compliance, as appropriate, and in the form provided by: -

- Full Volume arrangements as per Circular 0-3-4 "Motor Vehicle Compliance Plate Approval", or
- As per Circular 0-2-1 "Certification of Motor Vehicles Produced in Low Volume".



4.3 Application for SSM IPA can only be based on one first-stage IPA, with a separate SSM application required for each different first-stage vehicle Approval. Accordingly, any carry over evidence, as per 4.1.1 above, can only reference the one first-stage Approval.

4.4 A SSM IPA can include multiple vehicle variants and multiple engines and other options included in the SSM RVD, as supported by the evidence of ADR compliance provided.

4.5 Applications for SSM IPA are expected to demonstrate compliance with all ADRs applicable as of the date of issue of the SSM IPA. However if a completed first-stage vehicle IPA does not yet include a new ADR introduced under transitional implementation arrangements, then the SSM may submit an SE blank-form, and make application for an exemption from that ADR by referencing this Circular 0-4-6 clause 4.5. If exemptions are granted, then the SE blank-form will be noted as **“Not Applicable”**, and details of the exemption will be included in Schedule 5 of the Approval. Where such exemptions are provided the applicability date of the ADR will be noted, and the Approval issued will be restricted to the due date of that ADR. When the exempted evidence is subsequently provided, the Approval will be reissued without this date restriction.

4.6 Circular 79/00-1-1 “Second-Stage-of-Manufacture Emissions Evidence where there is an increase in GVM” details the arrangements that apply for emissions ADRs.

5. CHANGE IN VEHICLE CATEGORY

5.1 Where a SSM IPA application changes the ADR Vehicle Category from the original completed first-stage vehicle, then the SSM IPA must comply with all the ADRs applicable to the completed SSM Vehicle Category, as at the date of the issue of the SSM IPA, subject to 4.5 above.

6. ROAD VEHICLE DESCRIPTOR

6.1 Road Vehicle Descriptors (RVDs) are required for all SSM IPAs and should include all variants and options to be offered. The remarks section should include a brief description of the SSM additions/modifications, identifying the IPA and variant information of the completed first-stage vehicle.

7. VEHICLE IDENTIFICATION NUMBER

7.1 The Vehicle Identification Number (VIN) of the SSM vehicle shall be the same as the VIN of the first-stage vehicle.

8. DATE OF MANUFACTURE

8.1 The *Date of Manufacture* of the SSM vehicle shall be the date that it is completed and is in Australia in a condition that will enable it to be made available to the market.

Issued by the

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9. IDENTIFICATION PLATES

9.1 Following issue of an SSM IPA, the second-stage manufacturer will be able to affix a Second-Stage-of-Manufacture Identification Plate in addition to, and adjacent to the existing first-stage Identification Plate, as demonstration that the vehicle complies with the conditions of the SSM IPA.

9.2 SSM Identification Plates must be as per Circular 0-3-2. All SSM Identification Plates will be made available from a Contractor authorised to manufacture and supply Identification Plates, unless the second-stage manufacturer is authorised by the Administrator to supply their own Identification Plates. The SSM Identification Plate will include both VIN and *Date of Manufacture* as per 7.1 and 8.1 above respectively.

9.3 There is a prescribed fee payable to the Commonwealth for each SSM Identification Plate that is affixed to a vehicle. This fee is included within the supply of Identification Plates from the Contractor 9.2 above. Where the Administrator has authorised the SSM to supply their own Identification Plates the prescribed fee is to be paid directly to the Commonwealth. As at 1 November 2003 the prescribed fee is \$7.50 for each Identification Plate to be affixed to a SSM vehicle.

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Craig Findlay
Mechanical Engineer

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CONSULTING ENGINEERS
3/17 Pembury Rd, Minto NSW 2566
(PO Box 1052 Campbelltown NSW 2560)
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