



Australian Government

Department of Infrastructure, Transport,
Cities and Regional Development



Road Vehicle Standards



Survey of testing facilities and CRNs/SARNs affecting heavy trailers

Presented by Umesh Shamdasani

Certification and RAWs Section

Summary

Following consultation, industry has highlighted the effort required in making new submissions for ADR 38/05 and the workload needed for Component Type Approval (CTA) submissions.

As a result, VSS has reviewed the status of testing facilities, Component Registration Numbers (CRNs) and Sub Assembly Registration Numbers (SARNs) for heavy trailer RVCS submissions to determine the scope of associated issues.

Scope of analysis

Reviewed CRN/SARN status & use for trailers to identify:

1. Current state of affected RVCS test facilities
2. Current state of CRN/SARN evidence
3. Implications for trailer approvals

Department reviewed CRN/SARN usage in heavy trailers for 2018 calendar year:

- 1,092 trailer approvals and amendments
- 4,188 instances of CRN/SARN use in submissions, quoting 804 different CRNs/SARNs

Findings – testing facilities

Of the 37 testing facilities for heavy trailer CRN/SARN used in 2018:

19% are no longer active

- Only confirmed inactive facilities were counted in results
- This excludes facilities that have been purchased by another organisation or are operating under another business and/or have been relocated. These factors impact validity of evidence and conformity of production

35% of testing facilities are unconfirmed, predominantly due to nil response to enquiry

- This is mainly a function of outdated contact details

Findings – CRN/SARN evidence

Long term data has deteriorated over time

- Serial rollovers in RVCS
- Some early SARNs (particularly 38/XX CS) are submitted with statements of assurance
- Original evidence to ADR38/00 and some ADR38/02 no longer available on RVCS
- Continuity suffers when approvals change hands

About 27% of all trailer CRN/SARN approvals have no recorded evidence due to the age of the approval.

Findings – CRN/SARN evidence

Of CRN/SARN used in 2018 for trailers:

	CRN/SARN population	Test Facility not current	No evidence in RVCS	Total
Lighting	524	17.9%	37.8%	55.7%
Brakes	148	4.7%	6.8%	11.5%
Connections	132	7.6%	2.3%	9.8%

Notes:

- Incorrect evidence (eg. use of ECE for evidence) not counted
- There is no double counting where there is no evidence and no testing facility listed
- Does include contents of ‘cover all’ lists used for lighting submissions by some agents
- Lighting also affected by Hella lab closure

Implications for trailer compliance

Of approvals/amendments issued in 2018 for trailers:

Results were weighted by the number of times each CRN/SARN appeared in applications:

	Times CRN/SARN used	CRN/SARN where Test Facility not current	CRN/SARN where no evidence in RVCS	Total
Lighting	3,265	21.0%	48.9%	69.9%
Brakes	346	2.0%	9.8%	11.8%
Connections	577	10.2%	1.6%	11.8%

Treatments:

- Most critical case is new RVSA trailer approvals. These will require CTAs.
- Trailer approvals being opted-in will continue to be able to access CRNs and SARNs included in their MVSA approval. Submissions post opt-in will require CTAs to the extent the approval is varied.
- Approvals being amended under MVSA will continue to be able to submit CRNS and SARNs issued under MVSA.

ADR 38/05

ADR38/05 testing will be required for many existing and new SARNs, in particular Control Systems.

Other facets of industry make new submissions when ADRs change.

If trailer manufacturers choose not to 'opt-in', MVSA testing facilities can test and provide evidence for ADR 38/05 submissions for MVSA approvals up to the end of the transition period under the RVSA.

ADR 38/05 implementation dates:

- New model – 1 July 2019
- Existing models – 1 November 2019

CRNs / SARNS to Component Type Approvals

