



Australian Government

Department of Infrastructure,  
Regional Development and Cities



# RVSA Implementation Consultation Framework

Type Approvals Consultation Group

*Discussion Paper TA4 – RVSA Approval Numbering*

27 March 2019



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## Introduction

The Road Vehicle Standards (RVS) legislation has been passed by both houses of Parliament and will come into effect on 10 December 2019. In preparation for commencement of the legislation, the department is currently undertaking policy and procedures development to ensure an effective transition.

The department has continued to consult with stakeholders and is aware that some industry participants remain concerned about how certain aspects of the legislation will work in practice. The RVSA Implementation Consultation Framework was established as a mechanism to continue to engage with the road vehicle industry and in-service regulators to identify and develop practical solutions to issues relevant to the administration of the RVS legislation.


The department acknowledges that during the last round of consultation, industry expressed concern over the possibility of approval numbers changing under a Road Vehicle Standards Act (RVSA) approval. This paper will form the basis for discussion at the Type Approvals Consultation Group meeting on 27 March 2019. Outcomes of the discussion and a copy of this paper will be made available on the department's website.

## Introduction of new approval numbers under the RVSA

A number of stakeholders have expressed the desire to maintain approval numbers that were issued under the Motor Vehicle Standards Act (MVSA) once an approval is granted under the RVSA. The department understands that approval numbers are utilised by companies throughout management and engineering systems related to current Identification Plate Approvals (IPAs).

Concerns were also raised in relation to the transfer of Component Registration Numbers (CRNs) and Sub-Assembly Registration Numbers (SARNs). The department is aware that reference material and packaging for some components would need to be updated if numbers change. There are also significant numbers of approvals that rely upon CRNs and SARNs to demonstrate compliance with the Australian Design Rules.

The department requires an assurance that once the transitional period has expired, only approvals issued under the RVSA are used for vehicles being added to the Register of Approved Vehicles or by suppliers of road vehicle components. By introducing revised numbering for all approvals issued under the RVS legislation, the department will have means to ensure that all approval holders are meeting their obligations. The existing five digit MVSA numbering will easily identify those type approval holders who decided against opting in, or did not apply for an approval under the RVSA. The same assurance is required for testing facility and Component Type Approvals (CTAs).



The department is committed to creating a robust numbering system for all approval types for the introduction of the RVS legislation, whilst endeavouring to lessen the impact upon industry by introducing measures that will enable approval holders to maintain a level of continuity with the MVSA numbering system.

## Options for resolution

### 1 – A new numbering system that transfers MVSA numbers to RVSA numbers (Preferred option)

This option transfers existing approval numbers for IPAs, CRNs, SARNs and Test Facility Identification Numbers to the RVSA incorporating the old MVSA number within a new approval number. This would provide industry with continuity of existing numbering protocols whilst enabling the department to differentiate between the two different approval mechanisms.

If a type approval holder chooses to opt in, or apply for a new approval for an existing MVSA approval, they can indicate on the application form that they wish to use an existing approval number and provide this number at this time. Once the application is processed, the IT system will allocate a new number that incorporates the old one. For example, an MVSA IPA number that was originally 12345 will become VTA012345. This will enable traceability for industry to the existing approval numbers, whilst providing the department with the flexibility to allow for further expansion of the approval numbering system in the future and enable all stakeholders to easily identify the type of approval that has been granted.

This same principle will apply for CTAs and testing facilities. Once an application is lodged for either of these approval types, the applicant will have the ability to enter the previously allocated CRN or SARN that, once approved, will be allocated an RVSA approval number that incorporates the five digits of the old CRN, SARN or testing facility.

Under the RVSA, a testing facility with multiple locations may apply to have all facilities registered under the one approval. If an applicant decides to register all of their testing facilities under one number, they may choose to transfer one of the numbers that was granted under the MVSA and register all of the locations under that number, or have a new sequential number generated that covers all of the facilities.

#### How will it work?

When an application for an approval is lodged, the IT system will allocate a transaction reference number, which shall remain valid until the application is approved or rejected. The transaction reference number will be different from the final approval number allocated by the system. This is to safeguard against participants being able to predict what an approval number will be prior to approval being granted.

If an applicant chooses to opt in, apply for an RVSA approval after the opt in period, apply for a CTA or apply as a testing facility, a field in the application form will require an entry if the applicant wishes to retain the number of a current approval or registration that was granted under the MVSA. If this field is checked, the system will validate the number using data held by the department and if found to be acceptable, transfer the number into the new format.

The following table outlines the differences between MVSA and RVSA registration and approval types:

Table 1

MVSA	RVSA
Identification Plate Approval (IPA) – Standard, M&I, Non-standard	Type Approval – Standard, M&I, Non-standard
Sub Assembly Registration Number (SARN), Component Type Approval (CRN)	Component Type Approval (CTA)
Test Facility Registration Number	Testing Facility Approval

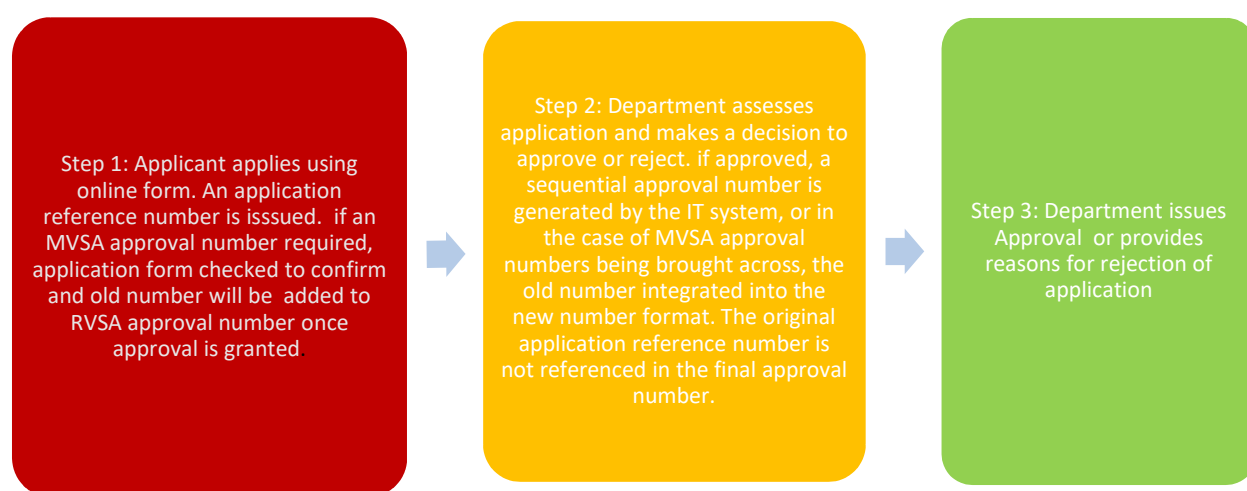
If a new application for type approval, CTA or testing facility is received that does not require an existing MVSA number to be transferred, the system will automatically allocate a sequential number, the same process as was used in RVCS. These numbers will commence from the following breakpoints:

- Type approval – VTA060000
- Component type approval – CTA060000
- Testing facility – TFA020000

All other approval types will be allocated a sequential approval number at the time of application approval. These numbers will start at 000001 and rise by increments of one for each new approval. The format for all approvals will be:

- Registered Automotive Workshop -RAW000001
- Specialist and Enthusiast Vehicle -SEV000001
- Authorised Vehicle Verifier -AVV000001
- Model Report -MRE000001
- Light trailer Type Approval -LTA000001
- Concessional RAV Entry -CRE000001
- Non-RAV entry Import Approvals -NRI000001
- Reimportation Import Approval -RIM000001
- Advisory notice a thing is not a road vehicle -NRV000001

If the application is approved, the IT system will generate an approval number in the format highlighted above. In the instance where the applicant has requested that a MVSA approval number, the nine-digit approval identification number will contain the original MVSA allocated five-digit number. If the application is rejected, the IT system will generate a number in the format highlighted above with an R as a suffix to the number indicating that it is a rejection decision.



## 2 – Allocate new numbers for all approvals and maintain a cross reference resource

This option is a new numbering protocol that allows for the creation of new numbers for all approvals and would ensure that there is no confusion between MVSA and RVSA approvals. The department would commit to publishing cross reference guidance material for MVSA approval numbers that are allocated new numbers under the RVSA in the form of a concordance document. The cross reference material would be in electronic format published on the departmental website. It would include references to MVSA approval numbers for the following approval types:

- Type approval
- Component type approval
- Testing facility

The following table outlines the differences between MVSA and RVSA registration and approval types:

Table 2

MVSA	RVSA
Identification Plate Approval (IPA) – Standard, M&I, Non-standard	Type Approval – Standard, M&I, Non-standard
Sub Assembly Registration Number (SARN), Component Type Approval (CRN)	Component Type Approval (CTA)
Test Facility Registration Number	Testing Facility Approval

When an application for an approval is lodged, the IT system will allocate a transaction reference number, which shall remain valid until the application is approved or rejected. The transaction reference number will be different from the final approval number allocated by the system. This is to safeguard against participants being able to predict what an approval number will be prior to approval being granted.

Under this proposal, all approval numbers would start from 000001 for each approval type and would increase incrementally by a factor of one for each new approval. The numbering protocol for the different approval types would be:

- Type Approval -VTA000001
- Component Type Approval -CTA000001
- Testing Facility -TFA000001
- Registered Automotive Workshop -RAW000001
- Specialist and Enthusiast Vehicle -SEV000001
- Authorised Vehicle Verifier -AVV000001
- Model Report -MRE000001
- Light trailer Type Approval -LTA000001
- Concessional RAV Entry -CRE000001
- Non-RAV entry Import Approvals -NRI000001
- Reimportation Import Approval -RIM000001
- Advisory notice a thing is not a road vehicle -NRV000001

## Advantages and disadvantages of options

Option 1: Create a new numbering protocol that allows the MVSA approval number to be incorporated into a new approval number	
Advantages	Disadvantages
Ensures that all approvals granted under the RVSA are easily traceable to previous approvals by Government, with the additional digit and prefix indicating that it has then been through the RVSA approval process.	Applicants will need to apply for transfer of a MVSA approval number.
Provides industry with traceability to existing MVSA approval numbers for type approval, component type approval and testing facilities. All existing documentation that approval holders use within their organisation for these streams can remain the same, as there will only be a prefix and an additional digit.	An MVSA approval holder may inadvertently or otherwise simply add a prefix and '0' to their documentation and continue providing the product without being granted an RVSA approval.
The approval identification number will remain the same for the life of the approval. When a new application is submitted at the end of the seven-year approval period, the approval holder can choose to maintain the same number if it is still valid.	
Having a prefix for the approval number that clearly articulates the type of approval enables easy identification.	
Option 2: Create a new numbering protocol for all approval types and publish cross reference material	
Advantages	Disadvantages
Approvals granted under the RVSA will be easily identifiable.	Cross-referencing of MVSA approval numbers against RVSA numbers will require industry and the department to undertake additional tasks in order to conduct business as usual.
	Possibility of incorrect transcription of cross-referenced numbers to RVSA numbers.
	The administration of a concordance document will add to the recoverable cost of certification.





## Discussion questions

- The department's preference is option 1. What are the impacts on industry of a change in numbering protocols through either option 1 or option 2?
- Do you have any additional comments/suggestions regarding the proposed numbering protocol?
- It is our intention to maintain the current numbering system for production and design facilities. What are the benefits of maintaining this arrangement over recording the production and design facilities on each application? Is it more effective to record these details on each application?

## **ATTACHMENT A – Transitional procedures for the use of RVCS to apply for RVSA approvals**

It is possible that the ROVER system will not be fully operational upon commencement of the RVSA. In the interim, it will be necessary to continue to register applications for type approvals and component type approvals in the RVCS system. Due to limitations of the system, this will mean that the current five digit numbering protocol will continue for new component type approvals and type approvals issued in this period.

It will be necessary to generate a RVSA approval using RVCS in this interim period. Once a new approval is generated, it will be allocated a sequential number by RVCS. When the approval is raised, it will contain the new protocol number in the text of the approval that includes the five-digit number allocated with the relevant RVSA prefix to the type of approval; for example, an RVCS generated approval number for a type approval of 51999 would be allocated the RVSA number of VTA-051999. This will also be the case for opt in approvals during the first six months. If the applicant wishes to use an MVSA generated number the approval will be re-raised using the existing number.

Once the ROVER system is operational, all approvals will be transferred from RVCS to the new system.