



Australian Government

Department of Infrastructure,
Regional Development and Cities



RVSA Implementation Consultation Framework

RVSA Tools Consultation Group

*Discussion Paper TL3 – Introduction to Authorised Vehicle
Verifier Approvals*

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Introduction

This paper is designed to provide members of the RVSA Tools Consultation Group with information about how a corporation will be approved to be an Authorised Vehicle Verifier (AVV) and the conditions to which the AVV approval is subject. It will do so by providing:

1. An overview of the tools, where they sit in the Road Vehicle Standards Rules 2019 (RVS Rules), and how they interact with other parts of the RVS Rules.
2. The role of AVVs
3. An overview of the administrative process for applying for an AVV approval.
4. Proposed inspection procedures
5. An overview of conflicts of interest matters

1. Overview of 'tools'

To understand what tools are, and how they fit into the RVS legislation, it helps to understand the structure of the RVS Rules.

The RVS Rules are divided into 9 Parts. Each "Part" outlines different features of the RVS Rules. The most relevant Parts for this discussion group are outlined below:

- Part 2 sets out the arrangements for the Register of Approved Vehicles (RAV) – such as what will be included on the RAV when entering a vehicle. It also sets out that an entry onto the RAV happens via an 'entry pathway'.
- Part 3 sets out two RAV entry pathways – type approval and concessional RAV entry. Each pathway calls up different 'tools' that need to be used on that pathway.
- Part 4 sets out the arrangements and requirements for each tool: RAW approvals, model reports, AVV approvals, testing facilities and the SEVs register.

The table below indicates the tools that are applicable to each RAV entry pathway and where AVVs fit into the picture.

RVS Rules Pathway	Relevant tools
Type approval pathway (Also applicable to component type approvals)	<u>Testing facilities</u> Testing facilities must be used when obtaining evidence of compliance to national road vehicle standards (unless other acceptable evidence, such as UN approvals, is used).
	<u>Model reports</u> Model reports can be used by heavy trailer and second stage manufacturers to assist in providing evidence of compliance with the national road vehicle standards. Model reports are not applicable to any other kind of type approval or component type approvals.
	<u>Component type approvals</u> component type approvals can be used as evidence that vehicles fitted with the approved components comply with the relevant national road vehicle standards.
Concessional RAV entry pathway	<u>SEVs Register</u> A vehicle that is on the SEVs Register can be granted a concessional RAV entry approval under the 'vehicles to be modified by the holder of a RAW approval' concessional RAV entry pathway
	<u>Registered Automotive Workshop (RAW) approvals</u> Concessional RAV entry approval vehicles that used the 'vehicles to be modified by the holder of a RAW approval' eligibility criteria must be modified by a RAW.
	<u>Model reports</u> All vehicles that are modified by the holder of a RAW approval must be modified in accordance with an approved model report.
	<u>Testing facilities</u> Evidence from testing facility approval holders may be required when preparing a model report.
	<u>Component type approval</u> The use of components covered by a component type approval can be used as evidence of compliance with the national road vehicle standards when preparing a model report.
	<u>Authorised Vehicle Verifier (AVV) approvals</u> All vehicles that are modified by the holder of a RAW approval must be inspected and verified by the holder of an AVV approval.

2. Authorised Vehicle Verifiers (AVVs)

Under the Road Vehicle Standards (RVS) legislation, a corporation (Australian or registered overseas) may apply for and obtain approval as an Authorised Vehicle Verifier (AVV), providing certain requirements are met.

An AVV approval empowers the approval holder to provide an independent vehicle inspection and verification service. This is intended to provide vehicle owners, and the public more broadly, greater assurance of vehicle integrity and compliance for vehicles that have been modified by a Registered Automotive Workshop (RAW), as well as in other circumstances that may be required by conditions on approvals. All AVV vehicle inspections must take place within Australia.

An AVV may not simultaneously be both a RAW and an AVV. This is to avoid the conflict of interest that exists between RAWs and AVVs and maintain the AVVs independence.

A vehicle that is covered by a Concessional RAV entry approval (i.e. vehicles not available under the Type Approval pathway) will be required to be verified by an AVV where:

- the vehicle is manufactured or modified under a RAW approval using a current approved Model Report (MR), or
- a condition is imposed on the Concessional RAV entry approval which requires the vehicle, or modifications of the vehicle, to be verified by an AVV.

An AVV will generally be required to verify three aspects of the vehicle: compliance with a model report, damage or corrosion, and odometer accuracy. AVVs must be able to demonstrate competency in all three areas.

3. Administration of AVV approval applications

Applying for the grant of an AVV approval is a relatively straightforward process:

- Step 1: A corporation interested in being granted an AVV approval will apply online, using an approved form. We anticipate that corporations interested in applying to be an AVV may apply for an approval prior to 10 December 2019.
- Step 2: The department will assess the application against the requirements of the RVS Rules, using internal guidance material to ensure consistency in assessment of applications.
- Step 3: The department will then make a decision about the application: whether to grant or refuse to grant the corporation an AVV approval.

This section will explore what happens in each one of these steps. It will also look at two of the more complex and subjective concepts in the AVV approval assessment space:

- determining a vehicle's extent of crash damage or corrosion
- determining whether a vehicle's odometer reading accurately reflects the vehicle's mileage

This paper sets out proposed policy parameters the department will apply to these concepts to improve transparency and consistency in assessment. Stakeholders are invited to provide their feedback on the parameters to help develop them.

Step 1: Application

A corporation that wishes to be granted an AVV approval will need to make an application.

The application form will be available online and will guide applicants through the information that they need to provide. The department has prepared some information about the kind of fields that the form will contain (see [Attachment A](#)).

The application form requires an applicant to make declarations and acknowledge conditions to be adhered to that will help the applicant to understand the requirements of becoming and operating as an AVV.

Supporting information for some of the declarations will also be required to be submitted with the application.

An application fee to recover the cost of assessing the application must also be paid before the application can be submitted.

Step 2: Assessment of application

Assessors will examine the application, including any declarations that were provided and any information uploaded in support of the application.

Declarations

The application form will require the corporation to declare certain matters and support these declarations with additional information. For example we require declarations that the corporation:

- has, or has access to, the appropriate technology, equipment and procedures to inspect vehicles
- has measures that will avoid and manage conflicts of interests
- will only inspect and verify vehicles that are in Australia
- will only verify vehicles if all the inspection requirements are met
- will complete verification reports for each inspect and retain a copy of these reports for 7 years
- will provide the department with a copy of adverse verification reports within 1 business day of completing the reports
- will notify the department of errors in information entered on the RAV
- will ensure that only appropriately skilled staff will carry out the inspections

Information to support the declarations

In addition to these declarations the applicant will also need to provide information to support some of these declarations. This information will be required on every application and will be assessed by the department. For example, the application will require the applicant to provide information demonstrating that the corporation:

- has, or has access to the appropriate staff, technology, equipment and procedures to inspect road vehicles

- has in place effective arrangements to reduce the likelihood that conflicts of interest will arise and ensure that any conflicts that do arise are appropriately managed

The table below provides our initial thinking on what we would find acceptable for staff, technology, equipment, and procedures.

Eligibility criteria	Information to be provided by the applicant	Assessment to be conducted
<p>Corporation has, or has access to:</p> <ul style="list-style-type: none"> • appropriate technology, equipment and procedures to inspect road vehicles • appropriately skilled staff to carry out such inspections 	<p>An AVV will be required to verify three aspects of the vehicle: compliance with a model report, damage or corruptions, and odometer accuracy. AVVs should be able to demonstrate competency in all three areas.</p> <p>The applicant needs to provide information demonstrating that the corporation has, or has access to, the appropriate staff, technology, equipment and procedures to inspect road vehicles.</p> <p>The Rules do not specify prescriptive qualifications for AVV staff. This gives flexibility to:</p> <ul style="list-style-type: none"> • recognise equivalent skills and experience • applicants who may have a number of staff to perform distinctly different tasks <p>For example, by not requiring specific qualifications a corporation could have a qualified engineer that conducts the inspections, an apprentice who assists and a separate staff member that handles record keeping.</p> <p>The following information is required to support a declaration that appropriately</p>	<p>The qualifications and experience considered suitable would be those appropriate for the type of inspections performed. For example, automotive qualifications and experience is appropriate to inspect mechanical work but is not necessarily appropriate to inspect Left-Hand Drive conversion modifications.</p> <p>Consideration needs to be given to how the applicant's staff who will be performing AVV inspections will gain a strong knowledge and understanding of AVV procedures. For example, an AVV could provide an AVV Inspection Procedure manual which provides detailed step by step instructions on how to inspect vehicles modified by a RAW that are covered by the AVV approval.</p> <p>Appropriate technology and equipment that is suitable for an applicant for an AVV approval to have, or have access to, needs to be suitable for the modifications the AVV will inspect.</p> <p>Examples of such technology and equipment include:</p> <ul style="list-style-type: none"> • a hoist, pits, ramps or other device that allows a full underbody inspection for corrosion or damage • lighting equipment • borescope • camera • light transmission meter

Eligibility criteria	Information to be provided by the applicant	Assessment to be conducted
	<p>skilled staff will carry out AVV inspections:</p> <ul style="list-style-type: none"> • name, qualifications, details of membership of any relevant bodies, experience and contact details of existing staff who may undertake AVV inspections under this approval • qualifications, membership details and relevant work experience of prospective AVV inspectors to undertake AVV inspections 	<ul style="list-style-type: none"> • measuring equipment and gauges for disc rotors, brake drums, brake pads and brake linings • noise meter • evaporative emission testing equipment • equipment to check a vehicle's headlamp aim including a graduated headlight testing screen or headlight testing machine • inspection scheduling system <p>When considering whether an applicant "has access" to technology, equipment, and appropriately skilled staff, the applicant is responsible for providing sufficient evidence to demonstrate the criteria is met. This may be, for example, a contract in place for certain services, a procedure that sets out how hoists will be accessed if they do not have a physical premises, or the procedures they might use to ensure they only inspect vehicles that they are able to inspect.</p> <p>"Has access" would not generally be able to be satisfied by the technology merely existing in an accessible form. For example, an applicant does not have access to a decibel reader just because a shop that they can access sells a decibel reader.</p>

Eligibility criteria	Information to be provided by the applicant	Assessment to be conducted
<p>Corporation has in place effective arrangements that:</p> <ul style="list-style-type: none"> • reduce the likelihood that conflicts of interest will arise • ensure that any conflicts that do arise are appropriately managed 	<p>Documents which should be attached to the application to support the applicant's claim that there is no conflict of interest between the applicant and a RAW would include those demonstrating the applicant has appropriate arrangements and policies in place to prevent and manage conflicts of interest arising in the verification of vehicles.</p> <p>This will assist the assessor to recognise when conflicts of interest are likely to exist in the relationship between an AVV applicant and a RAW.</p>	<p>Due to the role that an AVV approval holder plays in the provision of Specialist and Enthusiast Vehicles to the Australia market, it is essential that the integrity of the corporation holding the approval is not compromised.</p> <p>When the integrity of the corporation holding an AVV approval is compromised, it may result in vehicles that do not comply being entered onto the RAV, resulting directly in a reduction in the compliance of the vehicle fleet with safety, environmental, and antitheft standards.</p>

Step 3: Decision and granting of an AVV approval

Once submitted, the application must be considered within 30 business days. If a request for further information has been made, any period from the day the request was made to when the last of the information requested is received is not included in the 30 business days.

Once the application has been assessed, the assessor will make a recommendation to the decision maker about whether to grant, or refuse to grant, an AVV approval.

Granting of an AVV approval

A decision maker may only grant an AVV approval to a corporation if the corporation has demonstrated that:

- it has, or has access to:
 - appropriate technology, equipment and procedures to inspect road vehicles
 - appropriately skilled staff to carry out such inspections
- it is not a holder of a RAW approval
- neither it nor any of its key management personnel have a financial interest in a RAW approval holder
- its key management personnel are not key management personnel or employees of a RAW approval holder

- it has in place effective arrangements to reduce the likelihood that conflicts of interest will arise and to ensure that any such conflicts that arise are appropriately managed
- it will comply with the conditions of the approval

If it is decided to grant an AVV approval, the applicant must be notified in writing as soon as practicable and be provided with a copy of the approval.

The approval must specify the following:

- the name of the corporation that holds the approval
- the categories of road vehicle that may be verified under the approval
- the date the approval commences
- that the approval will expire at the end of the period of 5 years, unless it is revoked earlier
- the conditions to which the approval is subject

Refusal to grant an AVV approval

A decision maker must refuse to grant a corporation an AVV approval if the eligibility criteria are not met. A decision maker may also take into account previous compliance with road vehicle legislation or other relevant matters when refusing to grant a corporation an AVV approval.

An applicant must be notified in writing of a decision to refuse to grant an AVV approval as soon as practicable. The notification will include reasons for the decision.

Reasons for decision will include the criteria in the Rules that were not met and/or other considerations of concern in relation to the application and the information that was taken into account when deciding the criteria were not met. The notification will also identify options for seeking review of the decision.

4. Inspection procedures

An AVV will be required to verify three aspects of the vehicle:

- compliance with a model report,
- damage or corrosion, and
- odometer accuracy.

AVVs must be able to demonstrate competency in all three areas. This section examines the department's proposed approach for these inspections.

The department recognises that a thorough check of every item in a model report is likely to be prohibitively expensive and require an inspection that occurs over a number of hours, if not days. These procedures reflect an approach that balances the requirement that inspections be thorough, against the importance of having a strong and cost effective AVV network.

Risk based checklist

The department is proposing a process where the checklist for an AVV to verify against will contain all check items for damage, corrosion, and compliance with model reports. However only a randomised selection of these items will be mandatory as part of the inspection. The rest of the items would be optional. The mandatory items will vary for each inspection.

The list of mandatory checks to be performed will be sorted into groups covering the various systems in the vehicle to ensure that items from each group are captured in the mandatory inspection list:

- brakes, Steering, wheels and Tyres
- lighting
- occupant Protection
- emissions and Noise
- general Safety and Dimensions

Just because items are optional in the checklist it does not mean that an AVV can turn a blind eye to noncompliance that they notice as they inspect mandatory items. For example, if the mandatory checks require inspection of the brakes, but in the process of inspecting the brakes they notice rust in a structural area of the vehicle, then this should be recorded on the verification report and a vehicle verification can be refused, even if the item was not mandatory.

Further information about the areas where AVVs could inspect for damage and corrosion is available at [Attachment B](#).

Vehicle's odometer is accurate

A requirement of AVV approvals is, the AVV must be satisfied that the vehicle's odometer accurately reflects the vehicle's mileage. AVVs should, in the first instance, request vehicle history documentation from the RAW or vehicle owner and compare this documentation to the vehicle's odometer.

In most cases vehicle history information can be obtained by services or governments in the country the vehicle was sourced. If the odometer reading is less than that contained in the documentation, the AVV must refuse to verify the vehicle.

In the event the vehicle is from a country where vehicle history information is not available, the AVV must use other methods to determine if the odometer reading has been altered, including examining the odometer for physical signs it has been tampered with and interrogating the Vehicle's computer for confirmation of the actual kilometres.

For second stage of manufacture, information about odometer reading is unlikely to be available (because the vehicle is new). For such vehicles the AVV must confirm the vehicle is new and there is no registration history.

5. Conflicts of interest

Authorised vehicle verifiers have a position of trust in the regulation of road vehicles in Australia. Their decisions to verify vehicles and enter these vehicles on the Register of Approved Vehicles (RAV) directly impact on the safety of Australians using the roads. Given the significance of AVVs as a gatekeeper to the RAV it is important that AVVs do not verify vehicles that should not be verified.

The Rules recognise that situations would arise where an AVV may feel pressured to make a decision to verify a vehicle that they should not verify.

To manage this risk, AVVs must have **effective** procedures to identify and manage situations where there is, or may be, pressure (whether real or perceived) to verify a vehicle that should not be verified. That is, they must effectively manage conflicts of interest.

This includes identifying the conflicts of interest, both real and perceived, that either exist in the way the corporation is structured, or that may arise over the course of operating as an AVV.

There are some conflicts of interest that are unacceptable:

- AVVs cannot be RAWs and their key management personnel cannot be RAWs
- AVVs and their staff cannot inspect and verify any vehicles in which they have a financial interest

For other conflicts of interest, the department will assess each conflict, and the management strategy for this conflict, on its merits.

We will generally look positively on applications that are honest and transparent in their identification of conflicts of interest. Organisations that are willing to identify the full spectrum of conflicts that exist in their organisation, including their management strategies for these conflicts, are generally more suitable to hold AVV approvals.

Corporations must strive to establish an ethical and accountable workforce that embraces reporting of conflicts as they arise and manages these conflicts appropriately – honesty and transparency in dealing with conflicts of interest is an important part of creating such a culture. .

Examples of potential conflicts of interest that corporations should have effective strategies to manage:

- immediate family member of an AVV staff member seeks verification through the AVV
- close business relationship between AVV and RAW means AVV feels they have to approve vehicles to maintain customer base
- AVV shares a premises, block, or warehouse with RAW workshop or are in close proximity to each other (e.g. neighbours, same business park etc)
- the AVV has close associations with entity involved in fraud, vehicle theft, rebirthing and odometer tampering

Discussion questions

- What information will you find helpful as we develop the AVV model. For example, should we develop:
 - Additional information about conflicts of interest?
 - Additional guidance about appropriately skilled personnel?
- Are there scenarios or examples that you want the department to consider:
 - If you or your members are interested in becoming an AVV do you have specific questions about whether we would consider the personnel that you have as being suitably skilled?
 - Do you need advice on specific conflicts of interest that you have identified?
- Do you we believe we have the right balance between thorough inspection and maintaining a strong network for AVVs? Are you supportive of a randomised approach to mandatory items in the checklist? Are there certain items that we shouldn't randomise?
- How much do you think the inspection might cost given our initial thoughts about inspection procedures?

Attachment A

Given the important role AVV approval holders have in ensuring vehicles that are entered onto the Register of Approved Vehicles comply with the national road vehicle standards the application form requires detailed information and supporting documentation.

The below table indicates the types of information that is required.

Information required for all applications made for the grant of an AVV approval.

Information	What is required?	Reason
Acknowledgement of penalties and requirement to comply with department requests	<p>Applicants must tick Yes or No to questions which require acknowledgement of</p> <ul style="list-style-type: none"> consequences if false or misleading information is given requirements to comply with certain requests 	<p>An applicant may commit an offence or contravene a civil penalty provision if false or misleading information is given or a declaration is made that is false or misleading. An application may be refused to be considered if an applicant does not comply with a request for further information or if a request for an inspection is not complied with.</p>
Legal entity name	Legal name of the corporation	Section 90 of the Rules requires that an applicant for the grant of an AVV approval be a corporation.
Trading name	If applicable, the name under which the corporation trades.	For identification purposes.
ABN/ACN or ARBN	<p>Applicants must identify if the corporation is a registered Australian business that has an Australian Business Number (ABN) or Australian Company Number (ACN), or both.</p> <p>Applicants must identify the ABN for Australian corporations or an Australian Registered Body Number (ARBN) for foreign corporations.</p>	Section 90 of the Rules requires that an applicant for the grant of an AVV approval be a corporation.
State company registered in	The state or territory of registration.	For identification purposes.

Information	What is required?	Reason
Registered office address	The registered office address as provided to the Australian Securities and Investments Commission (ASIC).	For identification purposes.
Place of business	Address of the corporations place of business. This includes any premises occupied by the corporation or used by the corporation in the verification of vehicles.	To identify where operations are undertaken by the corporation.
Applicant details	<p>Details of the contact person within the corporation who is authorised to make the application on behalf of the corporation. Details include: first name, last name, phone number, email address, role, date of birth and mailing address.</p> <p>Photo identification of the applicant must be attached to the application.</p>	For identification and contact purposes.
Key personnel ¹ details	<p>Applicants must identify the first name, last name, role, date of birth, phone number and email address of each key management personnel.</p> <p>The applicant must acknowledge that details of key management personnel must be kept up to date.</p>	To identify the applicant's key personnel.

¹ Key management personnel of a body corporate, means persons that have authority and responsibility for planning, directing, and controlling the activities of the body corporate (whether directly or indirectly) and includes any director (whether executive or otherwise) of the body corporate.

Information	What is required?	Reason
Vehicle inspection scope and region	Applicants must identify the categories and types of vehicles they intend to inspect and the geographical region they will perform the inspections.	Section 97 of the Rules requires the AVV approval to specify the categories of road vehicle that may be verified. The geographic region helps us to know where services will be offered.
Declarations of verifying only vehicles which meet specific conditions	<p>The applicant must declare that a road vehicle will only be verified if:</p> <ul style="list-style-type: none"> • a signed approval from the RAW has been sighted (if the vehicle has been modified by a RAW) • the vehicle has, or its modifications have, been checked against the vehicle's latest model report • the level of damage or corrosion does not exceed the determined threshold • the vehicle's odometer is accurate • a concessional RAV entry approval condition is met 	To be eligible to be granted an AVV approval, the Secretary (or delegate) must be satisfied that the corporation will comply with the conditions to which the approval will be subject. It is a condition of an approval that an AVV only verify a vehicle if certain criteria are met (section 100 of the Rules) and that all inspections must occur in Australia (paragraph 101(c) of the Rules).
Acknowledgment that a verification report needs to be completed and sent to the department	<p>The applicant acknowledges that after verifying a vehicle or its modifications, it must:</p> <ul style="list-style-type: none"> • complete a verification report and retain it with the model report verification checklist for 7 years • provide copies to the department when requested • enter the vehicles details on the RAV <p>The applicant must also acknowledge that:</p> <ul style="list-style-type: none"> • after failing a vehicle or its modifications it must provide the department with a copy of the checklist and verification report within 1 business day after it is completed 	To be eligible to be granted an AVV approval, the Secretary (or delegate) must be satisfied that the corporation will comply with the conditions to which the approval will be subject. It is a condition of an approval that an AVV undertake these actions (subsections 100(4), (5) and section 103 of the Rules).

Information	What is required?	Reason
Confirmation that appropriately skilled staff will carry out AVV inspections	The applicant must confirm that only appropriately skilled staff will carry out AVV inspections.	To be eligible to be granted an approval, the Secretary (or delegate) must be satisfied that the applicant corporation has, or has access to appropriately skilled staff (subparagraph 93(1)(a)(ii) of the Rules). It is also a condition of an AVV approval that only appropriately skilled staff carry out AVV inspections (paragraph 101(b) of the Rules).
Acknowledgment to comply with a determination relating to inspection of road vehicles	<p>The applicant acknowledges it will keep informed of and comply with determinations relating to the inspection of a road vehicle by an AVV, specifically:</p> <ul style="list-style-type: none"> • the steps to inspect a vehicle • technology and equipment to be used • inspection procedures • administrative matters 	To be eligible to be granted an AVV approval, the Secretary (or delegate) must be satisfied that the corporation has, or has access to the technology, equipment and procedures to inspect road vehicles in accordance with requirements set out in a determination made by the Minister (subparagraph 85(a)(i) of the Rules). Section 97 prescribes the matters that can be covered by a determination relating to inspection of road vehicles.
Conflict of interest with a RAW declaration	The applicant must declare that the key personnel of the applicant do not have a conflict of interest with a RAW and that the applicant has procedures to reduce the likelihood that conflicts of interest do not arise and if any do, they are appropriately managed	<p>To be eligible to be granted an AVV approval, section 93 of the Rules requires that the Secretary (or delegate) be satisfied that:</p> <ul style="list-style-type: none"> • the applicant corporation or any member of key management personnel not hold any financial interest in a corporation that holds a RAW approval • the applicant corporation, is not a holder or a RAW approval • the key management personnel of the applicant corporation are not key management personnel or employees of a corporation that holds a RAW approval • the applicant corporation has in place effective arrangements to reduce the likelihood that conflicts of interest will arise in relation to activities undertaken by the corporation under the AVV approval, and to ensure that any such conflicts that arise are appropriately managed.

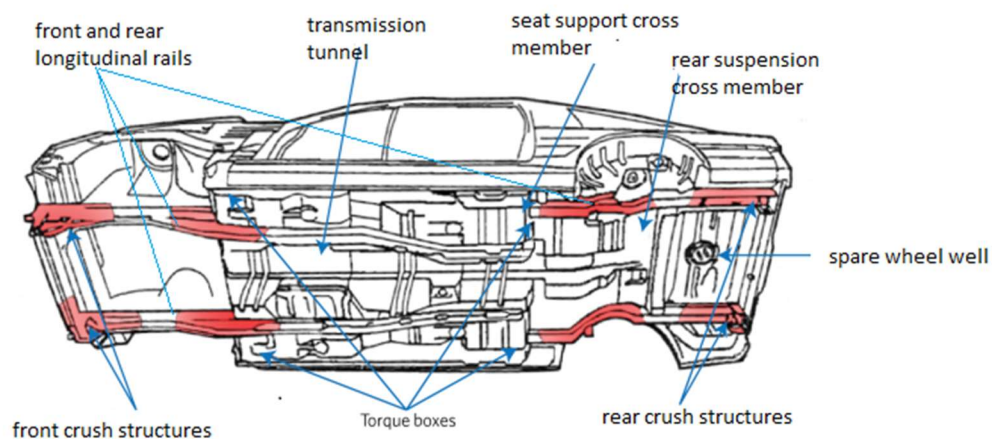
Information	What is required?	Reason
Previous contraventions of road vehicle legislation	The applicant must identify if the corporation, or any member of the key management personnel, has, or may have contravened road vehicle legislation.	Section 94 of the Rules allows the delegate, when deciding whether to grant, or refuse to grant, an AVV approval, to take into account whether the corporation, or key management personnel, has, or may have contravened road vehicle legislation.
Acknowledgment of requirement to notify the department of errors	The applicant must complete an acknowledgment that as soon as it becomes aware of an error in information entered on the RAV it will notify the department as soon as practicable.	To be eligible to be granted an AVV approval, the Secretary (or delegate) must be satisfied that the corporation will comply with the conditions to which the approval will be subject. It is a condition of an AVV approval that if the holder of the approval becomes aware of an error in information on the RAV that the holder of the approval notify the Secretary as soon as practical (section 105 of the Rules). This provides a high level of confidence that the information entered on the RAV by an AVV is accurate.

Attachment B

When inspecting vehicles for corrosion and damage checks the AVV will need to inspect the following areas. We are continuing to work on an acceptable threshold for damage or corrosion that is acceptable in these areas. Inspections include both interior and exterior checks. Where examination requires parts of the vehicle to be removed, the AVV can ask the RAW to remove such parts.

For all passenger vehicles and goods vehicles:

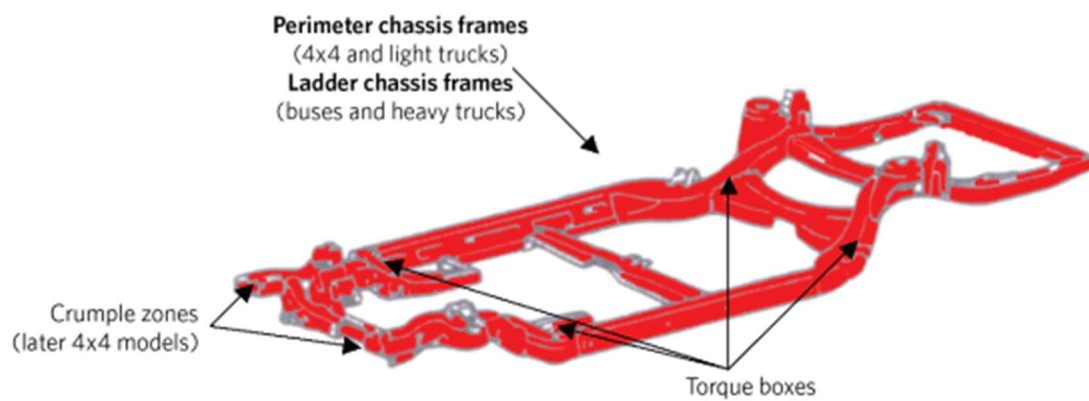
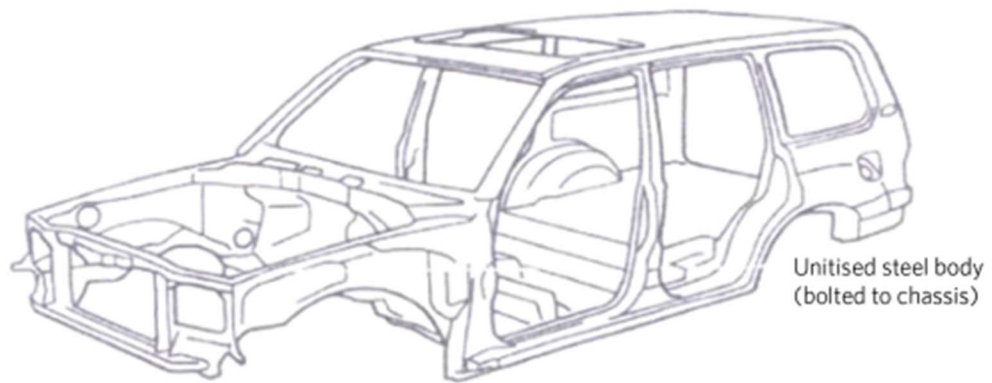
Underbody



With the vehicle on a suitable hoist and with appropriate lighting the AVV must inspect each vehicle's underbody for damage in the following areas:

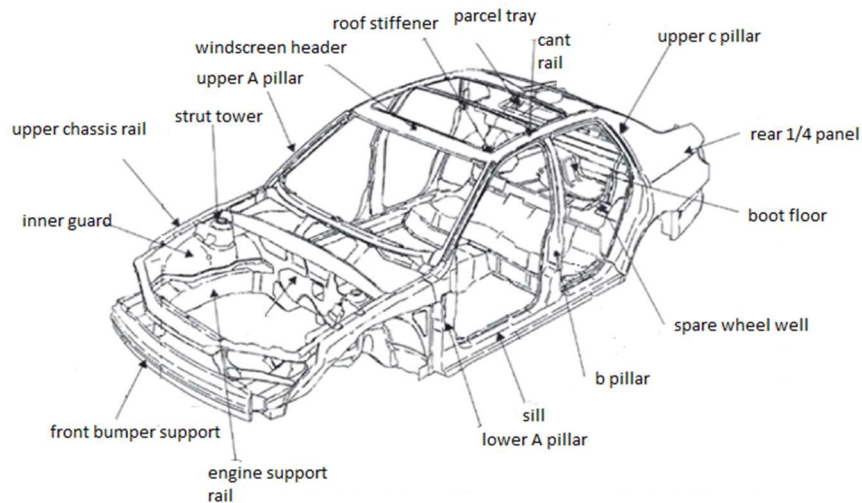
- Left and right front crush structures
- Left and right front longitudinal rails
- Floor Pan Stiffening Members
- The transmission tunnel
- Torque boxes
- Rocker Panels (Sills)
- Left and right rear longitudinals and
- Left and right rear crush structures

For vehicles that use a body on chassis design, the whole of the chassis is considered structural. The diagram below provides a better indication of what to check for.



Exterior Checks

Which includes:



1 Inner guard	8 Cant rail	15 Rear seat floor	22 Front bumper
2 Upper chassis rail (reinforcer)	9 Roof (not shown)	16 B pillar	23 Spare wheel well
3 Strut tower	10 C pillar (upper)	17 Floor	24 Tunnel (longitudinal)
4 A pillar (upper)	11 Rear panel	18 Sill (rocker panel)	25 Rear seat cross beam
5 Windscreen header	12 Rear ¼ panel	19 A pillar (lower)	26 Rear suspension cross beam
6 Roof stiffener	13 Boot floor	20 Bulkhead	
7 Parcel tray	14 Rear seat back	21 Lower (engine) chassis rail	

Interior Checks

Which Includes:

- Seat and Seatbelt anchorages
- A pillar
- B Pillar
- C Pillar
- Vehicle Floor
- Door Sills
- Airbags and airbag mounting points

Doors

Which includes:

- Side door intrusion beams
- Door hinge mounts
- Door latch mounts

Requirements for Motorcycles

The AVV must check each motorcycle for:

- Frame Damage
- Damage Repair

Odometer

Each Verification will also include a number of checks to confirm the odometer reading accurately reflects the number of kilometres the vehicle has travelled.