



Australian Government

Department of Infrastructure,
Regional Development and Cities



RVSA Implementation Consultation Framework

Type Approvals Consultation Group

*Discussion Paper TA2 –Secure Vehicle Identification marking –
supplier arrangements*

10 August 2018



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Introduction

The Australian Government released exposure drafts of the suite of Road Vehicle Standards (RVS) legislation, including draft Road Vehicle Standards Rules (the Rules), for public consultation in mid-December 2017. This formal consultation process closed on 16 February 2018 and the Department of Infrastructure, Regional Development and Cities (the Department) received a total of 86 public submissions. In response to feedback received, the Government announced that it would make a number of refinements to the Rules. These have been published on the Department's website.

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 RVS Implementation Consultation Framework (the 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 framework established three separate consultation groups to address specific issues through a targeted consultation process. The Department is committed to working collaboratively with industry and in-service regulators through these groups to facilitate the smooth and effective implementation of the RVS legislation.

This paper will form the basis for discussion at the Type Approvals Consultation Group meeting on 10 August 2018. Outcomes of the discussion and a copy of this paper will be made available on the Department's website.

Vehicle marking and nominated plate supplier arrangements

Under the *Motor Vehicle Standards Act 1989* (MVSA), the Department has nominated a plate supplier to:

- provide selected regulated entities with identification plates¹ that comply with requirements (Administrator's Circular 0-3-2), and
- to record vehicle production numbers and so collect mandatory fees from these entities

The RVS legislation will remove the requirement for all vehicles to fit identification plates and replace this with entry on the Register of Approved Vehicles (RAV). Charges will be applicable to all vehicles entered on the RAV.

Despite the RAV being an electronic register, there will be physical markings on vehicles required by the RVS legislation. ADR 61 (vehicle marking) will be amended to require vehicles to have a secure vehicle identification (SVI) marking. This requirement was announced by Minister Fletcher in

¹ Manufacturers must obtain identification plates from the nominated plate supplier for a small number of vehicle types. However, for most vehicle types, other than heavy trailers, use of the nominated plate supplier is optional.

August 2017. For the majority of vehicles, SVI will have to be a tamper resistant label as defined in the amended ADR 61.

However, for all trailers and some heavy vehicles (subject to consultation) SVI is likely to be an expansion of the current requirement under ADR 61 to fit a 'vehicle plate' (a plate that provides information on a vehicle's configuration²). Vehicle plates are not currently required to be sourced from the plate supplier.

The following table shows this information by vehicle category.

| Type of vehicle | MVSA | | RVSA | | |
|--|-----------------------|-----------------------------|-----------|-------------------------------|--|
| | ID (Compliance) plate | Information (vehicle) plate | RAV entry | Information (vehicle) plate | SVI label |
| Heavy vehicles (NC) | ✓ | ✓ | ✓ | TBC (subject to consultation) | ✓ (If information plate not fitted) |
| Heavy Trailers ATM > 4.5t | ✓ | ✓ | ✓ | ✓ | ✗ |
| Heavy Buses (ME) | ✓ | ✓ | ✓ | TBC (subject to consultation) | ✓ (If information plate not fitted) |
| Light commercial (NA, NB1*, NB2*) | ✓ | ✗ | ✓ | ✗ | ✓ |
| Light trailers ATM ≤ 4.5t | ✓ | ✓ | ✓ | ✓ | ✗ |
| Light vehicles | ✓ | ✗ | ✓ | ✗ | ✓ |

Whether heavy buses and trucks retain their vehicle plates and the form and content of SVI marking will be progressed through the established vehicle standards forums. The necessary amendments to ADR 61 are scheduled to be completed by the end of 2018. The Department will endeavour to ensure that the form and content of SVI marking will be in line with international and/or major market requirements as much as possible. There may also need to be minor changes to the 'vehicle plate' content, including to pick up some information that is currently on identification plates (such as trailer sub assembly numbers).

² Under the MVSA, a vehicle plate can be combined with an identification plate, as it shares much of the same information.

Secure Vehicle Identification Marking – performance specifications

The requirement for SVI marking was introduced to compensate for a perceived increase in anti-theft risk under the RVS legislation as vehicles would no longer have identification plates.

Where SVI marking is in a label format, the performance specifications will include:

- tamper evident;
- fraud resistant; and
- self-destructive where there is an attempt to remove the label.

For both labels and plates, there will be a need for consistent format / information. For labels, the requirements will be added to an amended ADR 61. For vehicle plates, it will have to be decided (via the ongoing ADR consultation process) if the existing formatting / information requirements for identification plates held in Administrator's Circular 0-3-2 should be added to the existing basic lettering requirement for vehicle plates in ADR 61, as part of an amendment.

Secure Vehicle Identification Marking – supply arrangements

The nominated plate supplier arrangements for identification plates will continue until at least all provisions of the MVSA cease at the end of the RVS transitional period (currently anticipated to end in mid to late 2020).

Under the RVS legislation, a nominated supplier arrangement would be reduced to supplying SVI (labels or vehicle plates). These arrangements, whilst not essential, could be beneficial to assist industry with meeting performance specifications for SVI. Supplier arrangement options are:

1. optional - that is supplier contract continues under the RVS legislation and is optional for all regulated entities
2. mandatory use of a SVI supplier, or
3. left entirely up to industry (no SVI supplier) - under this arrangement, the existing MVSA plate supplier contract would cease at the end of the transitional period (that is, 2 years after Royal Assent of the *Road Vehicle Standards Act 2018*)

Discussion question

Under the RVS legislation, what supply option do you prefer for SVI markings (labels and vehicle plates)?