



Australian Government

Department of Infrastructure, Transport,  
Cities and Regional Development

# Road Vehicle Standards

## RVSA Implementation Consultation Framework

Type Approvals Consultation Group

*Position Paper TA4P – RVSA approval numbering*

4 July 2019



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## Introduction

The Road Vehicle Standards (RVS) legislation has been passed by both houses of Parliament and the substantive provisions are scheduled to commence 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 Road Vehicle Standards Act (RVSA) 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 department met with the Type Approvals Consultation Group and other relevant stakeholders in Sydney on 27 March 2019 to discuss options for the numbering of approvals under the RVSA. Discussion paper (*TA4 – RVSA Approval Numbering*) outlined options for discussion. This position paper will outline the Department's position to be presented to the Type Approvals Consultation Group meeting in Brisbane on 3 July 2019. A copy of this paper will be made available on the Department's website.

## New approval numbers under the RVSA.

A number of stakeholders 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 (IPA).

Concerns were also raised in relation to the transfer of Component Registration numbers (CRN) and Sub-assembly Registration numbers (SARN). 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 to the ADRs.

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 RAV 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 Facilities (TF) and Component Type Approvals (CTA).

The department is committed to creating a robust numbering system for all approval types under the RVSA, 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.

## The Department's position

The department has settled on a position that will allow the transfer of existing approval numbers for Identification Plate Approvals (IPA), component Registration Numbers (CRN), Sub Assembly Registration Numbers (SARN) and Test Facility Identification Numbers to the an approval granted under the RVS legislation incorporating the old MVSA number within a new approval number. This will 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:

- allow traceability for industry to the existing MVSA approval numbers;
- provide 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 component type approvals 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 identify 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. The concept of allocating transaction reference numbers was discussed at the Sydney consultation forum in March 2019.

Some members of the consultation group raised issues surrounding the allocation of the transaction reference number prior to the allocation of an approval number and the possibility that based on their current business practices the development of certification documentation may be delayed.

After careful consideration of all the factors, the department has decided to allocate a reference number prior to an approval number being generated as the position on approval numbering. The reasoning behind

this decision is based on intelligence gathered that indicates that the pre-empting of approval numbers in the import approval space may be a widespread practice and may lead to vehicles being imported into Australia that do not meet the criteria set out in the current legislation. The department is committed to ensuring this does not occur under the RVS legislation.

Under the RVS legislation, the department may refuse to consider or refuse applications for all approval types. The department has decided that the best administrative option is to only issue an approval number to an applicant once the decision to approve has been made. By issuing a transaction reference number, if an application has been refused or refused to be considered the applicant will not be at risk of introducing an anticipated approval number into certification documentation that may never be a valid approval number.

If an applicant chooses to opt in, apply for an RVSA approval after the opt in period, apply for a component type approval or apply as a testing facility, a field in the application form will prompt the applicant to indicate if they wish 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 Registration Number (CRN)	Component Type Approval
Test Facility Registration Number	Testing Facility Approval

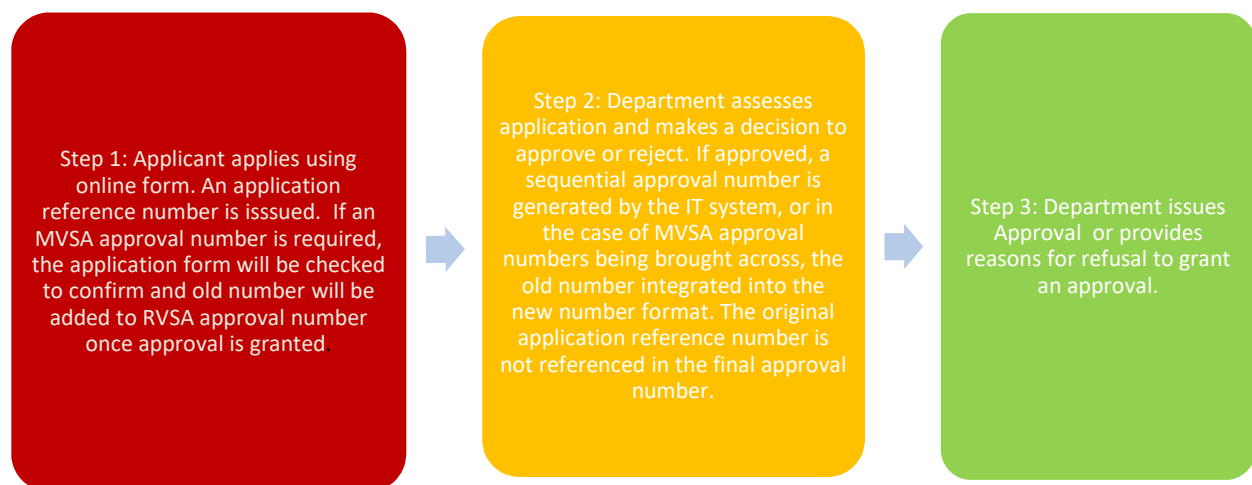
If a new application for type approval, component type approval or testing facility is received that does not require an existing MVSA number to be transferred, the system will automatically allocate a sequential number, the same process as was used in RVCS. These numbers will commence from the following 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 approval:	NRI000001
○ Reimportation import approval:	RIM000001
○ Advisory notice a thing is not a road vehicle:	NRV000001
○ RAV amendment:	QMM000001


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.



## Conclusion

The department has decided that after extensive consultation and careful consideration that the numbering system outlined in this paper provides the best option for the numbering of approvals granted under the RVS legislation.






Initially it is expected that certain approvals will be granted using the current RVCS system as outlined at attachment A. Once the ROVER system is functional, the automated allocation of approval numbers will provide the department and stakeholders with a robust and easily identifiable numbering system that is adaptable for:

- future expansion of the number of approvals granted; and
- new types of approvals that may be required as technologies evolve.

Where RVCS is used for the purposes of applications made and decided under the RVS legislation, the transitional procedures at attachment A will apply.



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

For the scheduled commencement of the substantive provisions of the RVS legislation in 2019, applications for the grant of a type and component type approval will be made 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 an approval under the RVS legislation 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.