

RVSA Implementation Consultation Framework

Type Approvals Consultation Group

Meeting 1 – Outcomes

10am – 12pm | Friday 10 August 2018

Cliftons Canberra | 2/10 Moore Street, Canberra, ACT

Participants

Chair - Sharon Nyakuengama, General Manager, Vehicle Safety Standards Branch (VSS), Department of Infrastructure, Regional Development and Cities (the Department)

Infrastructure

Graham Evans, Director, Program Support & Stakeholder Management, VSS

Ross Hamilton, Regulatory Design & Operational Implementation, VSS

Umesh Shamdasani, Director, Certification and Approvals, VSS

Stephen Spencer, Director, Technical Standards & Determinations, VSS

Sharon Stekelenburg, Change & Communications Manager, VSS

Alison Watson, Director, Regulatory Design & Operational Implementation, VSS

Industry

Organisation	Representative/s
Ascend Strategic Counsel	Peter Greenwood
Australian Imported Motor Vehicle Industry Association (AIMVIA)	Don Rossell Jack Sandher Zoran Tudorovic
Australian Trucking Association	Paul Walsh
Bus Industry Council (BIC)	Michael Kearney
Caravan Industry Association of Australia (CIAA)	James Field
Daimler Truck and Bus	Steven Ghaly
Federal Chamber of Automotive Industries (FCAI)	James Hurnall
Heavy Vehicle Industry Australia (HVIA)	Greg Forbes
Hino Truck and Bus	Barry Noble
Holden	Rob Dyer
Mercedes-Benz	Ellen Boyle

Mitsubishi	Ashley Sanders
National Heavy Vehicle Regulator (NHVR)	Peter Austin (by phone)
Peter L Smith Engineering	Peter Smith
Protech Developments	Pete Campbell
Queensland Department of Transport and Main Roads	Anant Bellary
RAWS Association	Rob Ogilvie
Toyota	Daniel Pegler
Truck Industry Council (TIC)	Mark Hammond Chris Loose
VicRoads	Michael Chan (by phone)

Chair's opening remarks

The Chair, Sharon Nyakuengama, opened the meeting by welcoming members and thanking them for their attendance.

Sharon provided background on the establishment of the RVSA Consultation Framework and consultation groups, and reiterated that the focus of the group would be on implementation of the Road Vehicle Standards legislation rather than the revisiting the legislation itself. Sharon also stressed the importance of coming to meetings prepared and with a view on any options presented in discussion papers.

Members requested that discussion papers be sent out more than one week prior to meetings to allow sufficient time for consultation with industry groups, and for the Department to consider hosting future meetings in east coast cities other than Canberra.

Agenda #	Item	Status	Action required	Action status
2	RAV guide for type approval holders	Amendments required	RAV data requirements to be reconsidered and RAV guide to be updated and finalised	Revised RAV guide to be circulated prior to next meeting

Discussion: FCAI sought confirmation that the intent of the RAV was to replace identification plates currently fitted to vehicles and questioned the need for some of the additional information that is being proposed for inclusion on the RAV, including tare mass and maximum engine power. Infrastructure advised that tare and power were being included at the request of jurisdictions to facilitate compliance with their provisional driver requirements. FCAI commented that providing additional information would increase costs for their members when developing new systems.

TIC, BIC and HVIA also expressed concerns relating to provision of power and tare-related information, commenting that power was unnecessary for heavy vehicles and tare information was often commercially sensitive. Infrastructure agreed to consider reducing and/or removing the need for this information in certain circumstances.

Industry representatives also noted that finalisation of RAV data requirements was necessary before they could obtain approval from parent companies to commence building new IT systems. FCAI said some level of certainty was also required regarding timeframes for testing.

Industry representatives requested an explanation and justification of the need for each RAV field, and sought validation criteria that will be used by NEVDIS to validate each piece of data submitted for entry to the RAV.

3	Discussion Paper TA1 – Modification of a road vehicle on the RAV before first provision to a consumer	Department will explore option 3 in more detail	Seek options to amend Rules to include principles for deciding what modifications are allowed, with details to be included in guidance material	Revised Rules are expected to be finalised once RVS legislation is passed
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Discussion: HVIA raised concerns in relation to the inclusion of a reference to VSB6 for modifying heavy vehicles in the revised version of the Road Vehicle Standards Rules. In particular, HVIA noted that different jurisdictions used different versions of VSB6 and that care would be required when drafting this new provision to reflect this. Industry advised that not all VSB 6 modifications would be suitable for this exemption.

Consultation group members also discussed the issue of incomplete (or partially completed) vehicles, and whether such vehicles should be accommodated in the legislation or guidance material in a similar fashion to the treatment of heavy vehicles and VSB6. Options that were discussed included a requirement for incomplete vehicles to be accompanied by instructions from the manufacturer on how to complete the vehicle and allowing modifications that complied with the requirements of VSB14.

Industry representatives commented that, of the potential solutions presented in discussion paper TA1, option 3 (the ‘hybrid’ approach, where principles for decision making could be included in the legislation, with specific examples in guidance material) would be preferred for maximum flexibility. However, it was noted that there would need to be three distinct categories of modification – second stage of manufacture; finishing of incomplete vehicles; and dealer accessories. The Department agreed to explore this possible solution further.

Industry representatives requested the Department to also consider the implications of current procedures set out in Administrator’s Circular 0-4-11 certification of chassis-cab vehicles.

4	Discussion Paper TA2 – Secure Vehicle Identification marking – supplier arrangements	Department to pursue option 1 and continue consultation on SVI	Department to continue to contract plate supplier under RVSA but use of this supplier will be optional	Consultation on performance specifications for SVI markings will be undertaken as part of ADR61 amendment process
<p>Discussion: TIC suggested that much of the information included on vehicle plates was no longer relevant once the vehicle was in service, and that the most useful source of data was the registration details. Industry representatives commented that, of the options presented in discussion paper TA2, option 1 (plate supplier contract to continue under the RVS legislation but regulated entities are not obliged to source plates from the contracted supplier) was preferred. Infrastructure confirmed that SVI marking performance specifications would be addressed as part of the consultation process for amending ADR61.</p>				
5	List of issues for consideration	Ongoing	List of issues to be updated	Revised list of issues to be circulated prior to next meeting
<p>Discussion: The Department sought feedback on further issues to be included for future consideration by the Type Approvals Consultation Group, including flagging high priority issues to facilitate prioritising of agendas going forward. FCAI agreed to provide more detail and requested inclusion of finalising RAV data requirements, and transition from MVSA to RVSA approvals. HVIA requested inclusion of transition of CRNs and SARNs to component type approvals, citing potential difficulties manufacturers might face if CRNs/SARNs cannot be converted to RVSA component type approvals in a process similar to that provided for whole vehicle type approvals. ATA supported HVIA's views and requested that a proposal to use existing CRN/SARN approval numbers be included for future discussion.</p>				