



Australian Government  
Department of Infrastructure, Transport,  
Cities and Regional Development



# Road Vehicle Standards

A background image showing a road with glowing blue and white light trails, suggesting motion and technology.

## RVSA Implementation Consultation Framework

Type Approvals Consultation Group

*Position Paper TA7P – Certification of cab-chassis vehicles*

20 November 2019



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## Introduction

The *Road Vehicle Standards Legislation Amendment Act 2019* has postponed the commencement of the substantive provisions of the Road Vehicle Standards (RVS) legislation to a date to be fixed by Proclamation, or 1 July 2021 if not fixed before this date. 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 Federal Chamber of Automotive Industries (FCAI) in Sydney on 2 May 2019 to discuss options for the certification of cab-chassis vehicles under the RVS Legislation. A proposed approach for the certification of cab chassis vehicles under the RVS legislation was set out in discussion paper [TA7 – Introduction to road vehicle type approvals](#) that was presented to the Type Approvals Consultation Group held in Brisbane on 4 July 2019. This position paper will outline the department's position to be presented to the combined consultation group meeting in Melbourne on 20 November 2019. A copy of this paper will be made available on the department's website.

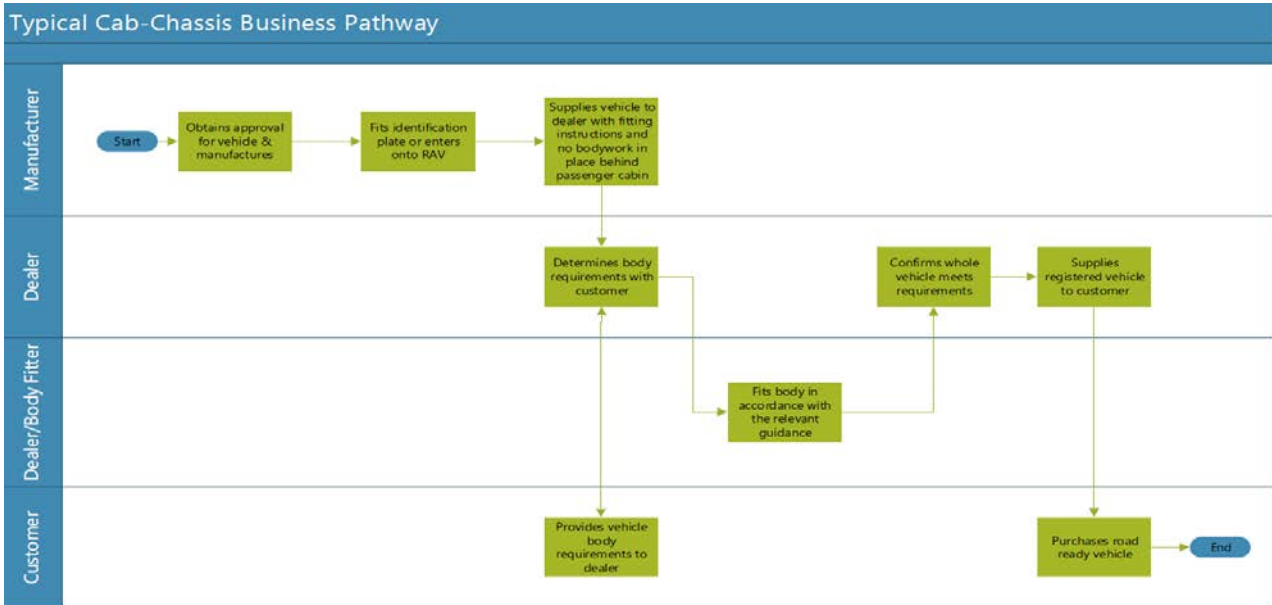
## Cab-chassis certification

A number of stakeholders expressed the desire to maintain the process of obtaining a Vehicle Type Approval (VTA) for a cab-chassis variant of a vehicle that is consistent with the type approved complete variant of the same model vehicle. The Road Vehicle Standards Rules 2019 (the Rules) set out the requirements for vehicles being certified under the type approval pathway. The Rules clearly articulate that to gain a type approval the applicant must be able to demonstrate that the type of vehicle being applied for complies with the applicable national standards at the time the vehicle is entered on to the RAV. In the case of a cab-chassis vehicle, the applicant cannot demonstrate full compliance as the body is fitted generally by a different entity.

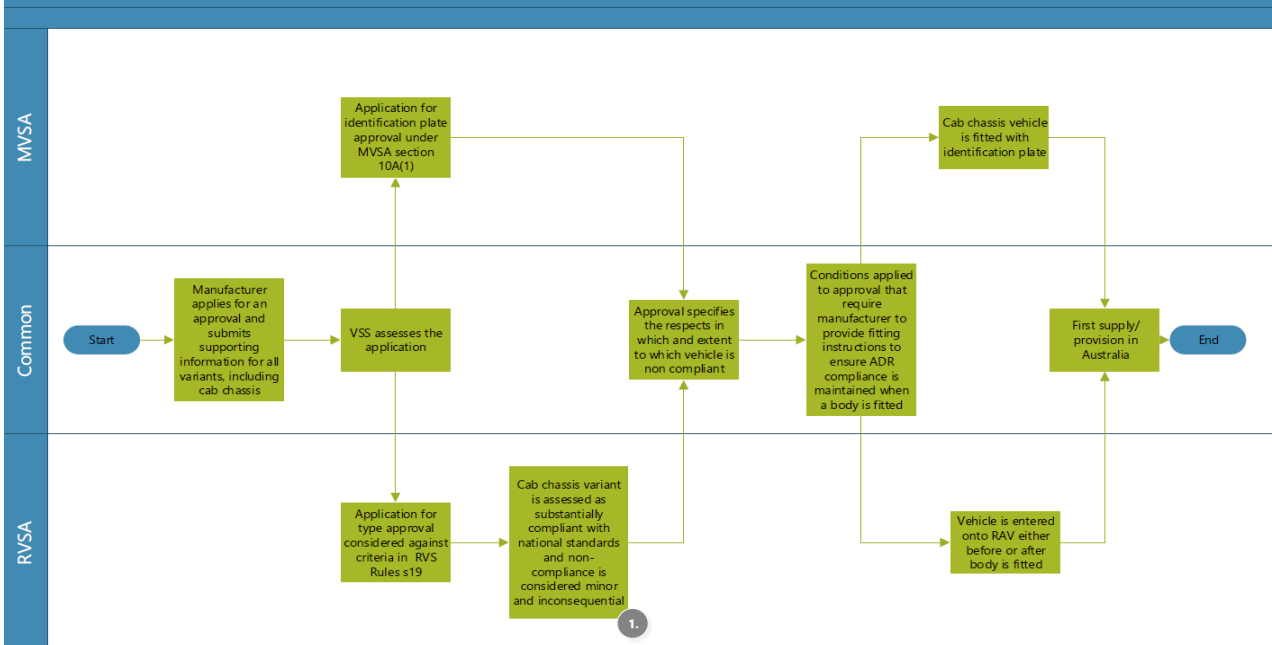
At the consultation discussion with the FCAI and in discussion paper TA7, the department outlined the current practice of certification and the proposed option under the RVS legislation using two diagrams. The diagrams summarise:

- our understanding of the typical business process in relation to cab-chassis, noting that there may be some differences in this process dependent on commercial arrangements
- how cab-chassis are currently handled under the MVSA, and how we propose to make decisions related to cab-chassis under the RVS legislation


## Comparison of MVSA and RVSA approval processes



## Comparison process for approved cab chassis road vehicles being supplied or provided under MVSA & RVSA



1. Note: This is consistent with Clause 4.1 of the Administrator's Circular 0-4-11



The FCAI agreed in principle that the business process map generally reflected current business practices. The department incorporated this information into discussion paper TA7 and has used this information to inform a final position on the certification arrangements for cab-chassis vehicles under the RVS legislation. Other issues such as tare mass requirements, build date of cab-chassis vehicles, and industry's reluctance to require a non standard approval for these types of vehicles were also taken into consideration in determining a final position on this matter.

## The department's position

The department has settled on a position that will allow manufacturers to apply for a type approval for cab-chassis variants that do not meet all applicable ADRs as a Minor and Inconsequential (M&I) non-compliance to the national standards. It would be expected that the manufacturer would commit to supplying instructions, guidelines and references to the relevant ADRs that must be met, to the entity that is responsible for completing the cab-chassis vehicles.

The department is committed to streamlining the process for the issue of M&I approvals under the RVS legislation. The current practice of submitting an M&I application and waiting for a letter from the administrator prior to an application for an approval will cease under the new arrangements. An automated system of allocation to the correct decision maker for M&I approvals will be built into ROVER capabilities negating the need for manual processing of application and approval documentation.

Under the new arrangements, the application for consideration of an M&I approval will be assessed in conjunction with the application for a type approval. An application for a cab-chassis M&I approval will be categorised as low risk and pass through a fast track capability within the ROVER system. All other M&I applications that require a technical assessment and decision to be made will be allocated to the certification team for assessment and decision, if approved the applicant will be notified electronically that the M&I has been approved and the approval has been granted.

### *How will it work?*

An application for a cab-chassis VTA will include evidence that the vehicle complies with the applicable road vehicle standards. Where the vehicle does not comply, the applicant will provide information about the non-compliance against the relevant standards as required.

Where an application for VTA includes fully compliant body-style variants as well as non-compliant cab-chassis variants, then separate evidence will be required for each ADR as applicable for the non-compliant variants.

The partially completed vehicle nature of a cab-chassis may result in some manufacturers seeking VTA for vehicles that do not fully comply with certain ADRs, as follows:

- The “Position” requirements of ADR13/00 for the following Lighting and Light Signalling devices:
  - Reversing Lamp (ADR1/00) – as per ADR13/00 Appendix A clause 6.4.4
  - Rear Direction Indicators (ADR6/00) – as per ADR13/00 Appendix A clause 6.5.4
  - Rear Reflex Reflectors (ADR47/00) – as per ADR13/00 Appendix A clause 6.14.4
  - Devices for Illumination of Rear Registration Plates (ADR48/00) – as per ADR13/00 Appendix A clause 6.8.4
  - Rear Position (Side Lamps) (ADR49/00) – as per ADR13/00 Appendix A clause 6.10.4
  - Stop Lamps (ADR49/00) – as per ADR13/00 Appendix A clause 6.7.4
- Wheel Guards (Mudguards) for the rearmost wheels as per ADR42/05 clause 17.2
- Provision for rear Registration Plate as per ADR61/03 clause 9.1.1.1

An application for VTA including cab-chassis variants that do not meet all applicable ADRs will be treated as a minor and inconsequential non-compliance (if the manufacturer commits to supplying instructions, guidelines and references to the relevant ADRs that must be met, to whoever is responsible for completing the cab-chassis vehicles).

Where applications for VTA including a cab-chassis vehicle are received seeking non-compliance with ADR13/00, ADR42/05 and/or ADR61/03 as per above, and assuming all other aspects of the application are ADR compliant a VTA will be issued with minor and inconsequential non-compliance with conditions included within the notice of approval.

The VTA will allow vehicles to be added to the RAV as cab-chassis that do not comply with ADR13/00, ADR42/05 and/or ADR61/03, as applicable, but does not allow the non-compliant cab-chassis to be provided to a consumer subject to the conditions on the approval. The notice will include details of the applicable non-compliance and the conditions to apply to cab-chassis vehicles granted minor and inconsequential non-compliance are:

- The approval holder must provide instructions, guidelines and references to the relevant ADR's that must be met, to whoever is responsible for completing cab-chassis vehicles prior to the vehicle being provided to a consumer for the first time in Australia.
- Use of the cab-chassis vehicles included in this approval are subject to any conditions that may be imposed by the relevant Registering Authorities.

The vehicle may be added to the RAV once a VTA is issued, which may be either before or after the body is fitted. The build date of the vehicle will be the date the vehicle comes off the production line consistent with the requirements of a passenger vehicle.

The following information will not be recorded on the RAV:

- a Minor and Inconsequential non-compliance with the national standards
- the tare mass for a commercial vehicle



## Conclusion

The department has decided that after extensive consultation and careful consideration that issuing an M&I for cab-chassis variants as outlined in this paper provides the best option for type approvals for these types of vehicles granted under the RVS legislation.

A streamlined system incorporated into the ROVER system to process M&I approvals will provide significant benefits to both industry and the department in reducing processing times whilst providing a robust certification framework.