



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



# Road Vehicle Standards

The background features a stylized road with glowing blue and white light trails curving into the distance. A white truck is visible on the right side of the road. The overall color scheme is blue and green.

## RVSA Implementation Consultation Framework

Combined Consultation Group Meeting

*Position Paper TLSEVS – Additional SEVs eligibility requirements*

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 2018* (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 RVSA Tools Consultation Group and other relevant stakeholders in Brisbane on 3 July 2019 to discuss matters relating to specialist and enthusiast vehicles (SEVs) including the definition of variant and the six eligibility criteria; handouts 1 through 7 detailed elements for discussion and feedback.

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.

## Background – the SEVs Register under the RVSA

The SEVs Register is designed to identify vehicles that are of a specialist and enthusiast nature that are not, or were not, genuinely available to Australian consumers.

To be entered onto the SEVs Register the vehicle must not be genuinely available to Australian consumers and must meet one of six eligibility criteria:

- performance
- environmental
- mobility
- left-hand drive
- campervans and motorhomes
- rarity

Unlike the current SEV scheme under the *Motor Vehicle Standards Act 1989*, in the RVSA framework vehicles are not automatically ineligible for entry on the SEVs Register if the model has been provided in Australia under a type approval. Instead, if the vehicle is of a different variant then it can be assessed for eligibility.



Key provisions in the Road Vehicle Standards Rules 2019 (the RVS Rules) include:

- s 128(1) – “...vehicles of a particular kind constitute a variant of a model of road vehicle if their design characteristics are significantly different from those of other vehicles of that model of road vehicle.”
- s 129(1), which says a variant is eligible if:
  - (a) it hasn't been provided in Australia under a type approval, is no longer genuinely available in Australia as a new vehicle, or wasn't genuinely available in Australia for a particular period and
  - (b) at least 3 months have passed since the variant became available in another market and
  - (c) it satisfies one of the six eligibility criteria.

## The department's position

At the RVSA Tools Consultation Group Meeting #3 in July 2019 the department consulted on elements of SEVs regulation including design differences that differentiate variants and each of the six eligibility criteria.

This paper sets out the department's position on the elements consulted on in July 2019 and provides further information and clarification on related matters resulting from the department's continuing policy implementation work.

The paper addresses the following topics:

- Comparison of variants to type-approved vehicles only
- Comprehensive details of distinct variants not always required for SEV eligibility
- Individual differences that are significant to differentiate a variant
- Differences that are not individually significant
- Genuine differences
- Additional matters relating to eligibility criteria
  - Performance
  - Environmental
  - Campervans and motorhomes

Note that there are no additional eligibility requirements for the mobility, left-hand drive or rarity criteria.

## Comparison of variants to type-approved vehicles only

Where variant assessment is required because vehicles of the type have been provided in Australia under type approval, the assessment is undertaken against variants that are provided in Australia under type approval (i.e. not against other variants that were not provided in Australia).

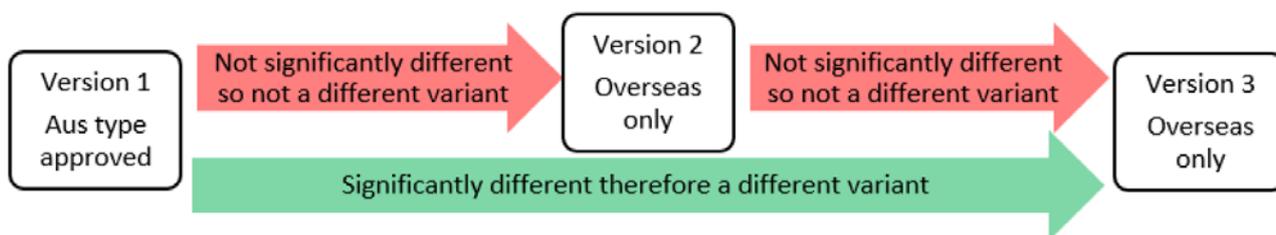
### Rationale

This goes towards the policy objective of improving choice for Australian consumers.

As noted on the previous page, s 128(1) of the Rules simply requires a variant to be significantly different from other vehicles of the model of road vehicle – this provision does not specify ‘vehicles of the model of road vehicle *in Australia*’.

There is no benefit in having a vehicle – that is significantly different from Australian-provided vehicles – assessed as ineligible because it is not significantly different from another version that is only available overseas and which itself is not significantly different from the Australian-provided version

This is illustrated below. It would frustrate the policy intent if a person could not access ‘version 3’, despite it being significantly different to the locally-provided ‘version 1’, simply because of the existence of ‘version 2’ in an overseas market.



## Comprehensive details of distinct variants not always required for SEV eligibility

While SEVs provisions in the RVS Rules are predicated on vehicle variants, the implementation of these provisions will be as streamlined and efficient as possible.

Rather than requiring descriptive detail and assessment of distinct variants for every single SEVs application, instead the approach will be:

1. Where a type of road vehicle has not been genuinely provided in Australia under a road vehicle type approval, a person may apply for that type of road vehicle – or a group of variants within that type – to be entered on the SEVs Register.
  - a. If a person applies for an entire type of vehicle, and it is readily apparent that every variant in the type is eligible, the entire type may be entered on the SEVs Register without the need for detailed variant-by-variant identification and analysis.



If it isn't clear that the entire type would be eligible the department could request further information from the applicant, such as variant specifications.

- An example would be a high-performance sports car model that has not been provided under type approval and which has been available overseas for more than three months. If it's clear that every kind of vehicle in the model range, regardless of differences in specification, would satisfy the performance criterion then there is no need for the applicant to document and apply for every different variant in the model range.
- b. If a person applies for a group of variants within a vehicle type, and it is readily apparent that the group of variants in the type is eligible, the eligible group of variants will be entered on the Register.

As above, the department could request further information in order to assess eligibility.

- An example would be a similar sports car model to the example above, i.e. one that has not been provided under type approval and which has been available overseas for more than three months. If this model is manufactured with two engine options – a high performance V8 and a lower performance inline-4 – and all the V8 variants meet the performance criterion but the inline-4 variants do not, then the applicant could simply apply for all the V8 variants at once; there would be no need to identify each different V8 variant and apply for them individually.
2. Where a type of road vehicle has been genuinely provided in Australia under a road vehicle type approval but one or more variants within that type have not been provided in Australia, a person may apply for any of those variants, or a group of variants, to be entered on the SEVs Register.

As above, the department could request further information in order to assess eligibility.

- An example would be a similar sports car model to the example above, i.e. one that has V8 and I4 engine options, but in this case the model has been provided in Australia under type approval, though only I4 variants. If all the V8 variants have been available overseas for more than three months and meet the performance criterion then the applicant could simply apply for all the V8 variants at once; again there would be no need to identify each different V8 variant and apply for them individually.

## Rationale

This approach means that the level of detail to be provided will only be what is necessary to assess that vehicles are eligible and not the same as those that are genuinely available to Australian consumers.

This will save time and effort for industry applicants, who will not be compelled to provide comprehensive details to justify each and every variant where there is no need if the vehicle type is not already provided in Australia.

## Individual differences that are significant enough to differentiate a variant

As noted earlier, subsection 128(1) the RVS Rules includes “...vehicles of a particular kind constitute a variant of a model of road vehicle **if their design characteristics are significantly different** from those of other vehicles of that model of road vehicle.”

Without limiting design differences that could be considered to be significantly different, a vehicle’s design characteristics are significantly different if they include any of the items listed in subsections 128(3) or 128(5) – for vehicles less than or equal to 12 tonnes GVM and greater than 12 tonnes GVM respectively. Where no single difference is significant on its own, a combination of differences may be significant when considered together.

The list of differences is longer for lighter vehicles than for heavier vehicles but in both cases one of the items is “differences of a kind set out in a determination under subsection 136(1)”.

A determination made under subsection 136(1) can determine matters relating to the criteria for vehicles to be entered on the SEVs Register. This includes clarifying or supplementing the differences listed in ss 128(3) and (5) and detailing matters relating to the six eligibility criteria.

In line with, and in addition to, the lists in ss 128(3) and (5), a determination to be made under subsection 136(1) will determine that any one of the differences listed in Table 1 on the following page is – by itself – significant for the purposes of differentiating variants within a model range.

That is, a vehicle is of a distinct variant of a vehicle model if, when compared to all the variants provided in Australia under a type approval for that model, any one of the differences in Table 1 is present. Table 1 reproduces and clarifies the items from ss 128(3) and (5).

The lists of differences in Table 1 are not intended to be comprehensive and do not exclude the possibility that other individual differences in design characteristics may also be assessed as significant.

Similarly, if none of the differences listed in Table 1 are present, vehicles of a particular kind may still be assessed as a distinct variant if their combination of design characteristics is significantly different from Australian type-approved vehicles.

Table 1: Significant differences that can differentiate variants from Australian type-approved vehicles

For L-group and MA, MB and MC vehicles	For MD, ME (≤ 12 tonnes), NA and NB vehicles:	For ME (> 12 tonnes) and NC vehicles:
<ul style="list-style-type: none"> <li>• a difference between internal combustion only, electric only, plug-in hybrid or non-plug-in hybrid; or</li> <li>• for internal combustion engines:               <ul style="list-style-type: none"> <li>(a) a different configuration – eg number of cylinders, arrangement of cylinders; or</li> <li>(b) a different induction method between naturally aspirated, turbocharged, supercharged or turbocharged+supercharged; or</li> <li>(c) a different fuel type – eg petrol, diesel, LPG (this does not extend to a difference in fuel grade such as regular unleaded vs premium unleaded); or</li> <li>(d) a difference in capacity of:                   <ul style="list-style-type: none"> <li>◆ for L-group vehicles, at least 30%; or</li> <li>◆ for M-group vehicles, at least 20%; or</li> </ul> </li> </ul> </li> <li>• for electric-only vehicles (not hybrids) a difference in driving range on a single charge of at least 10%; or</li> <li>• an increase in maximum power of at least 30%; or</li> <li>• a different transmission type; or</li> <li>• a higher number of gears in the transmission; or</li> <li>• a difference in number or position of powered axles – eg FWD, AWD, RWD; or</li> <li>• a different number of steered axles; or</li> <li>• a different body shape – eg sedan, station wagon, hatchback, coupé, convertible; or</li> <li>• a different number of side doors; or</li> <li>• a difference in the maximum number of suitable seating positions of at least 50% – examples:               <ul style="list-style-type: none"> <li>✓ a 3-seater has 50% more seats than an Aus-provided 2-seater</li> <li>✓ a 5-seater has 150% more seats than an Aus-provided 2-seater</li> <li>✓ a 2-seater has 50% fewer seats than an Aus-provided 4-seater</li> <li>✗ a 7-seater has 40% more seats than an Aus-provided 5-seater</li> <li>✗ a 2-seater has 33% fewer seats than an Aus-provided 3-seater;</li> </ul> </li> <li>• a different vehicle category; or</li> <li>• features designed to assist a person with a disability.</li> </ul>	<ul style="list-style-type: none"> <li>• a difference between internal combustion only, electric only, plug-in hybrid or non-plug-in hybrid; or</li> <li>• for internal combustion engines:               <ul style="list-style-type: none"> <li>(a) a different configuration – eg number of cylinders, arrangement of cylinders; or</li> <li>(b) a different induction method between naturally aspirated, turbocharged, supercharged or turbocharged+supercharged; or</li> <li>(c) a different fuel type – eg petrol, diesel, LPG (this does not extend to a difference in fuel grade such as regular unleaded vs premium unleaded); or</li> <li>(d) a difference in capacity of at least 50%; or</li> </ul> </li> <li>• for electric-only vehicles (not hybrids) a difference in driving range on a single charge of at least 10%; or</li> <li>• an increase in maximum power of at least 50%; or</li> <li>• a different transmission type; or</li> <li>• a higher number of gears in the transmission; or</li> <li>• a difference in number or position of powered axles – eg RWD, 4WD; or</li> <li>• a different number of steered axles; or</li> <li>• a different body shape; or</li> <li>• a different number of side doors; or</li> <li>• a difference in the maximum number of suitable seating positions of at least 50% – examples:               <ul style="list-style-type: none"> <li>✓ a 3-seater has 50% more seats than an Aus-provided 2-seater</li> <li>✓ a 5-seater has 150% more seats than an Aus-provided 2-seater</li> <li>✗ a 2-seater has 33% fewer seats than an Aus-provided 3-seater; or</li> </ul> </li> <li>• a different vehicle category; or</li> <li>• features designed to assist a person with a disability.</li> </ul>	<ul style="list-style-type: none"> <li>• a difference between internal combustion only, electric only, plug-in hybrid or non-plug-in hybrid; or</li> <li>• for internal combustion engines:               <ul style="list-style-type: none"> <li>(a) a different configuration – eg number of cylinders, arrangement of cylinders; or</li> <li>(b) a different fuel type – eg petrol, diesel, LPG (this does not extend to a difference in fuel grade such as regular unleaded vs premium unleaded); or</li> <li>(c) a difference in capacity of at least 50%; or</li> </ul> </li> <li>• for electric-only vehicles (not hybrids) a difference in driving range on a single charge of at least 10%; or</li> <li>• an increase in maximum power of at least 50%; or</li> <li>• a difference in number or position of powered axles – eg RWD, 4WD; or</li> <li>• a different number of steered axles; or</li> <li>• a different vehicle category; or</li> <li>• features designed to assist a person with a disability.</li> </ul>

## Rationale

The policy rationale for these significant differences is to provide a degree of simplicity when trying to determine whether or not a vehicle is of a different variant.

The lists of differences in Table 1 is not an exhaustive list of differences that are significant in isolation. Rather, the lists provide industry participants and vehicle enthusiasts with some certainty. Where a vehicle they are considering has one of the differences listed in Table 1, when compared to type-approved vehicles of that type in Australia, they can be assured that the vehicle is of a distinct variant.

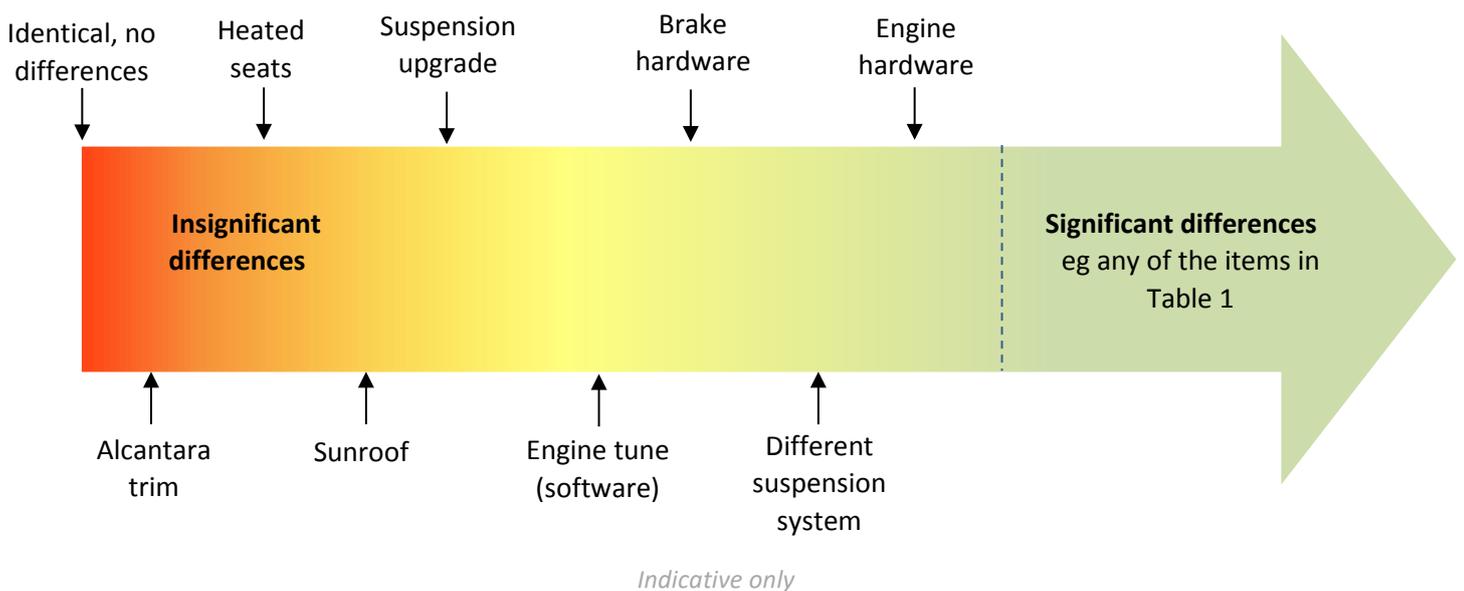
In general terms, these elements will make variant distinction due to significant differences as 'black and white' as possible so effort can go into the more complex assessment of combinations of less significant differences or individual differences for which the applicant makes a case for assessment as significant.

The department arrived at the differences in Table 1 following the July consultation and subsequent feedback from stakeholders. Some elements in the table are intended to align with international standards and are sourced or adapted from UN Regulation 0 (UN R0, which is only applicable to passenger vehicles), EC Directive 2007/46/EC or EU Regulation 168/2013 (which is applicable to mopeds and motorcycles).

The table at Appendix A details, for each item in Table 1, the source and/or rationale where relevant.

## Differences that are not individually significant

Where none of the differences listed in Table 1 are present, the concept of significant difference can be thought of as a gradient scale where the start and finish of the scale are clear, but the area in the middle requires case-by-case assessment by the department.





To support consistency in decision-making regarding when combinations of smaller differences are significant, the department will utilise the following principles when assessing significant differences:

1. Some design characteristics are more significant than others

Certain types of design characteristics will contribute to significant differences more than others. For example:

- Hardware or mechanical changes would generally be more significant than software or tuning changes. In turn, software and tuning changes would generally be more significant than cosmetic changes.
- Design characteristics that have an appreciable link to the eligibility criteria being applied for would generally be considered more significant (for example, performance brakes on performance variants, energy efficiency measures for environmental vehicles).
- Changes that impact shape and structure of the vehicle are more significant than paint or cosmetic treatments.

2. Differences will be more significant where they result in a change to the *operational performance* of the vehicle

For this purpose, operational performance means any of the following:

- Acceleration and braking;
- Energy Efficiency;
- Lateral adhesion / roadholding;
- Vehicle safety rating / crashworthiness;
- For vehicles seeking entry under the mobility criterion, ability to assist people with a disability.

3. Context matters

- The same design characteristic could have different weighting depending whether the characteristic is available on other variants in Australia. For example:
- If every vehicle variant available in Australia can have the option of a sunroof, then a variant with a sunroof as standard would not be a particularly significant difference.
- Equally, where a sunroof is exclusively available on one variant that is not genuinely available in Australia, this would increase the significance of this difference.

Practically, this would see:

- a. Variants that have a package of mechanical, software, and cosmetic changes likely being considered significantly different. For example, a variant with a brake upgrade, software tune resulting in higher engine output and cosmetic features would likely be significantly different.
- b. Variants with software and cosmetic differences may be eligible, depending on the context and extent of the differences:

- If the software tune and cosmetic changes are unique to the variant and not genuinely available in Australia then it would likely be considered a significantly different variant.
- If the software tune is available on other variants in Australia, then it would likely not be considered a significantly different variant, even if the cosmetic changes are unique.
- c. A variant that only has cosmetic differences cannot be considered a significantly different variant. For example a variant with design characteristics such as, leather seats, sunroof and body kit would not be considered to be significantly different.

While this gives some guidance about how the department intends to treat significantly different design characteristics, each individual circumstance will be assessed on its merits. This is because, as principle three outlines, context is an important part of the assessor's consideration of the variant.

### Rationale

The intent of recognising less significant differences as significant in combination is to better ensure that genuine specialist and enthusiast vehicles are suitably accessible.

Due to the sheer scale and degree of complexity that can go into design characteristics of road vehicles of all types, there is no simple set of metrics that can be fairly applied in all circumstances in assessing when a combination of minor differences may be considered significant for the purpose of differentiating a variant.

For this reason the department will utilise the principles outlined above as a method to ensure consistency in decision-making.

### Genuine differences

Regardless of whether individually significant differences or combinations of minor differences are relevant to an application, the differences between prospective SEVs and type-approved vehicles must be genuine differences in design characteristics, such as physical changes to the vehicle.

Differences in vehicle characteristics that are purely the result of differing reference standards, marketing specifications or measurement or testing methods are not valid for the purposes of variant assessment.

## Matters relating to eligibility criteria – Performance

The performance criterion consists of a power to weight threshold dependent on manufacture date:

- a. For vehicles originally manufactured before 1 January 2020—110 kW/tonne;
- b. For vehicles originally manufactured on or after 1 January 2020—130 kW/tonne.

In line with discussions at the July consultation meeting, the determination made under s 136(1) will specify that the mass value used in the power to weight calculation will be the tare mass of the vehicle.

Using tare mass will ensure that the performance criterion aligns with state and territory provisional licence restrictions for higher-powered vehicles.

## Matters relating to eligibility criteria – Environmental

The environmental criterion requires a vehicle to:

- meet or exceed either
  - the national road vehicle standards for emissions, or
  - emissions standards determined to be comparable to the national road vehicle standards that are applicable to new vehicles at the time the application is made and either
    - use a means of propulsion other than an internal combustion engine (ICE) – either instead of or as well as an ICE (ie EV or hybrid), or
    - have a maximum engine capacity of 660 cc, maximum power of 47 kW, maximum length of 3.4 m and maximum width of 1.48 m.

As noted in the July consultation paper, SEVs Handout 3 – Environmental, the determination made under s 136(1) will:

1. limit the small vehicle provision to M and N category vehicles.  
This will prevent the provision being used as a loophole for L-category vehicles.
2. clarify that ‘Standards determined to be comparable to ADRs’ (s 131(a)(ii)) are any standards that require similar or better emissions performance compared with the applicable ADRs for emissions.  
This allows for progression of standards over time as well as flexibility for applicants to request assessment of any emissions standards for comparability (though not all will meet requirements).

## Matters relating to eligibility criteria – Campervans & motorhomes

The campervans and motorhomes criterion caters for vehicles that were originally manufactured as a campervan or motorhome, or which are suitable for conversion into a campervan or motorhome that



would, once converted, comply with the technical requirements determined by the Minister in a determination made under s 89(2) of the RVS Rules.

The paper that was discussed at the July consultation meeting, SEVs Handout 6 – Campervans and Motorhomes, included a series of technical requirements including for elements such as headroom, cooking facilities and beds.

Upon further consideration, the department has concluded that while it would be possible to assess existing campervans and motorhomes against such requirements at the time of SEV Register application, it would not be feasible to use such detailed criteria in assessing whether vehicles are suitable for conversion to incorporate those elements in a compliant way.

Instead, the determination made under s 136(1) will distinguish between campervans and motorhomes on the basis that campervans are the more basic of the two options whereas motorhomes will have more inclusions.

- Campervans to have less restrictive requirements for compliance than motorhomes but be limited to:
  - GVM of 3.5 tonnes or less and
  - Body shapes:
    - Van/people mover
    - Utility or
    - Cab chassis.

Restricting campervans to a low GVM ensures that larger buses and goods vehicles are not eligible through the less onerous campervan requirements and removes the possibility that unintended heavy vehicles, such as sleeper cab trucks, may come through this option.

- Motorhomes to have more restrictive requirements/inclusions than campervans and, while not mass-limited, to be limited to the following body shapes:
  - Van/people mover
  - Utility
  - Bus
  - Truck
  - Cab chassis

Mandatory inclusions and other technical requirements, for both campervans and motorhomes, will be contained in the s 89(2) determination. Vehicles will have to comply with, or be modified to comply with, these requirements – and be verified by an AVV as compliant – before they could be provided to consumers.

## Matters relating to eligibility criteria – Mobility, left-hand drive, campervans & motorhomes and rarity

There are no additional requirements for the mobility, left-hand drive or rarity criteria but for all four of these options the department has arrived at a new position regarding older vehicles.

The July papers for each of these criteria suggested that for any eligible MD, ME, NB1 and NB2 vehicles (as applicable per eligibility criterion), vehicles would have to have been manufactured on or after 1 January 1989.

As these heavier vehicles are not eligible for the older vehicles pathway for vehicles 25 years and older, the purpose of this proposal was to ensure there would be applicable national road vehicle standards for these vehicles to be made to comply with.

Following feedback to these papers, the department has instead opted to not restrict the eligibility of older vehicles of these categories for these criteria. Instead, for vehicles of these categories that are 25 years or older, the s 89(2) determination would require these to meet standards that were in force for new vehicles 25 years before the date of application.

The rationale for this change is to allow genuine older specialist and enthusiast vehicles, that are eligible under these criteria, to be entered on the SEVs Register while ensuring they do not present an unacceptable risk to the community.

## Conclusion

The SEV sector is and will likely remain a heavily-debated segment of the vehicle industry given the diametrically opposing viewpoints of the primary stakeholder groups: original manufacturers and Registered Automotive Workshops.

The positions detailed in this paper are intended to represent compromise positions between the preferences of these groups in a way that will best achieve the objectives of the RVSA and the reforms it implements, including improving consumer access to specialist and enthusiast vehicles.

## Appendix A: Source and/or rationale for each significant difference in Table 1

### RVS Rules: [Road Vehicle Standards Rules 2019](#)

Explanatory material regarding differences in design characteristics that are significant can be found in paragraphs 677 to 681 of the [explanatory statement](#).

- EC-2007: Directive 2007/46/EC of the European Parliament and of the Council of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles – dated 9/10/2007
- EC-2019: Directive 2007/46/EC of the European Parliament and of the Council of 5 September 2007 establishing a framework for the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles – dated 24/04/2019
- UN R0: UN Regulation No. 0 Uniform provisions concerning the International Whole Vehicle Type Approval (IWVTA)
- EU-168: Regulation (EU) No 168/2013 of the European Parliament and of the Council of 15 January 2013 on the approval and market surveillance of two- or three-wheel vehicles and quadricycles – dated 20/02/2019

The four standards break vehicles down into ‘types’, ‘variants’ and ‘versions’. Some of the significant differences listed above have been adapted from either the ‘variant’ or ‘version’ provisions of these standards in order to realise the policy intent of improved consumer choice and/or align with vehicle characteristics already listed in the RVS Rules.

Significant difference	Source / Rationale
Motive power type: difference between internal combustion engine (ICE), electric propulsion (EP), plug-in hybrid or non-plug-in hybrid	RVS Rules ss 128(3)(b) and 128(5)(a) – see also example 1 at the end of section 128(3) and example at the end of 128(5) Power plant/propulsion: all four standards
ICE: difference in configuration:	RVS Rules s 128(3)(a) Number and arrangement of cylinders: all four standards
ICE: difference in induction method between naturally aspirated, turbocharged, supercharged and turbocharged + supercharged	RVS Rules s 128(3)(a)
ICE fuel type (but not fuel grade): difference between petrol, diesel, LPG (but not between, for example, 91/95/98 RON)	RVS Rules ss 128(3)(b) and 128(5)(a) – see also example 1 at the end of section 128(3) and example at the end of 128(5) Fuel type: EC-2019 & UN R0
ICE engine capacity: L-group: difference of 30% or more MA, MB, MC: difference of 20% or more MD, ME, NA, NB, NC: difference of 50% or more	RVS Rules ss 128(3)(a) Engine capacity: all four standards Difference of 30%+ (L-group): EU-168 Difference of 20%+ (M1), 50%+ (M2, M3, N1, N2, N3): EC-2007

Significant difference	Source / Rationale
<p>Driving range (EP-only ie not hybrids):  difference in driving range on a single charge of 10% or more</p>	<p>Electric energy consumption (weighted, combined): EC-2019  Driving range chosen over electric energy consumption:  a) as it's more relatable and easier to understand for the layperson compared to 'electric energy consumption' in Watt-hours/kilometre; and  b) taking into account general uneasiness in the public around electric vehicle range.  Recognising significant differences in EV range, such as long-range variants where the OEM provides a shorter-range version, or a short-range city runabout version compared to an OEM-provided longer range variant, may increase uptake of EVs.  10% is a compromise position between the opposing views of OEMs and RAWs.</p>
<p>Maximum power:  L-group, MA, MB, MC: increase of 30% or more  MD, ME, NA, NB, NC: increase of 50% or more</p>	<p>Maximum net power: all four standards  Maximum continuous rated power (electric): EC-2019  Difference of 30%+ (L-group): EU-168  Difference of 30%+ (M1), 50%+ (M2, M3, N1, N2, N3): EC-2007  Increase in power, rather than difference in power, to better target specialist and enthusiast vehicles.</p>
<p>Transmission:  difference in type</p>	<p>RVS Rules s 128(3)(c) – see also example 2 at the end of section 128(3)  Type of gearbox and number of gears: EC-2007 &amp; EU-168</p>
<p>Transmission:  higher number of gears</p>	<p>RVS Rules s 128(3)(c) – see also example 2 at the end of section 128(3)  Type of gearbox and number of gears: EC-2007 &amp; EU-168  Higher number, rather than difference in number, to better target specialist and enthusiast vehicles.</p>
<p>Drivetrain:  difference in number or position of powered axles</p>	<p>RVS Rules s 128(3)(c) – see also example 2 at the end of section 128(3)  Number/position/interconnection of powered axles: EC-2007, EC-2019 &amp; UN R0</p>
<p>Drivetrain:  difference in number of steered axles</p>	<p>RVS Rules s 128(3)(c)  Number/position of steered axles: EC-2007, EC-2019 &amp; UN R0</p>
<p>Body shape:  difference in body shape</p>	<p>RVS Rules s 128(3)(d) – see also example 3 at the end of section 128(3)  Body style/type of bodywork/basic characteristics of the bodywork shape: all four standards</p>

Significant difference	Source / Rationale
Body shape: difference in number of side doors	RVS Rules s 128(3)(d) - – see also example 3 at the end of section 128(3) Number of lateral doors: EC-2019 & UN R0
Seating: difference in the maximum number of suitable seating positions of at least 50%	Maximum number of seating positions: EC-2007, EC-2019 & UN R0 50% value selected to better target differences in number of seating positions that are significant, such as between 1- and 2-seat variants of a sports car, rather than less significant differences such as between 5 and 7 seats in a passenger-carrying vehicle. 'Suitable' intended to differentiate from unsuitable seating positions which are any seating positions that plainly fail to meet ADR requirements. Some markets allow seating types that are not acceptable in Australia; examples include folding seats that don't automatically lock into place and bench seats with designated positions that don't meet width requirements. Seating positions that could not be used in Australia are not eligible for assessment in determining variants.
Vehicle category: difference in vehicle category	RVS Rules s 128(3)(e)
Features designed to assist a person with a disability	RVS Rules s 128(3)(f)