

ROAD VEHICLE STANDARDS ACT



Boating Industry Association

IMPORTANT INFORMATION FOR TRAILER MANUFACTURERS and IMPORTERS

On July 1 2021 a 12-month transitional period began for implementation of the **Road Vehicle Standards Act (RVSA) 2018** to replace the Motor Vehicle Standards Act 1989. The RVSA better reflects the significant changes in global and domestic vehicle markets and improvements in vehicle technologies over the last few decades.

The new regulations and standards will impact ALL manufacturers and importers of Low ATM Trailers (Trailers): if this describes part of your business, please read on with attention as the clock is ticking and there is a need to take action early to ensure compliance and the ability to continue to trade after 30 June 2022.

The RVSA will provide industry businesses a level playing field, create a barrier to entry for newcomers and start-ups, improve the safety and compliance of Trailers being manufactured and arm federal government regulators with greater enforcement powers to assist in stamping out non-compliant and more importantly, unsafe Trailers making it onto Australian roads.

It is important to note that there is significant work involved with getting ready to be eligible to get your RVSA type approval – so it is critical that you start NOW.

The BIA has held discussions about what the RVSA means for Trailer marine industry members who manufacture or import Trailers or supply relevant components for such, with the Caravan Industry Association of Australia. The CIAA, as a leading industry association in the vehicles sector, has created the **Are you RVSA Ready?** website with several tools to assist businesses understand and comply with the RVSA.

The BIA is pleased to announce that CIAA has agreed to provide access to BIA members to all materials and information developed by CIAA to support their own members. BIA thanks CIAA for this support and welcomes the ongoing role of CIAA in representing all Trailer manufacturers during continuing discussions with the Australian Government Department of Transport.

The **Am I RVSA Ready Evaluation Tool** will guide Trailer manufacturers and importers through the key concepts and requirements of the RVSA helping identify gaps which may restrict your ability to obtain your type approvals.

As any new details come to light on the RVSA from the Federal Department, Caravan Industry Association of Australia will continue to update the RVSA Ready website to educate industry on their RVSA obligations.

To subscribe to the RVSA Ready website **[please click here](#)**

WHERE TO START

The **RVSA Roadmap** provides 9 steps to highlight what is required for your business and when these steps can be started. These are:

1. Australian Design Rules (ADR) identification
2. ADR evidence of compliance
3. Conformity of Production (QMS)
4. Set up account with the Road Vehicle Regulator (ROVER) portal
5. Enrol for Register of Approved Vehicles (RAV)
6. Apply for Vehicle Type Approval
7. Start to use new Vehicle Plate
8. Enable Federal Regulators (VSS) to access facilities
9. Enter on to RAV all Trailers produced/imported

HOW TO GAIN TYPE APPROVAL

Two of the key elements to develop your business's Type Approval are:

- To introduce a Quality Management System (QMS) within your business and to demonstrate that you have effective control or Conformity of Production (CoP); and
- to identify all components used in your vehicles build that have an ADR associated and collect and hold evidence of compliance for each component.

Both elements will need to be completed before you can finalize your type approval application within ROVER. These elements must remain a part of your business systems once you have transitioned to the RVSA and will need to continue to be updated and treated as living documents within your business.

CONFORMITY OF PRODUCTION

The first key element to obtaining these necessary type approvals will be your ability to prove you have ***adequate control over all stages of design, componentry, and manufacture of the recreational vehicles you are producing/ supplying***. In other words, you will need to have some form of Quality Management System (QMS) in place to demonstrate that you have effective control or **Conformity of Production**.

For Trailers, vehicle type approval applicants must keep their supporting information and all relevant documents up to date to satisfy eligibility criteria: an appropriate QMS will demonstrate full control of the design, componentry and manufacturing process. More information on QMS is available in Appendix 2 and Appendix 3 of the **Guide to vehicle type approvals – August 2021**.

To assist industry members with Conformity of Production requirements of the RVSA, CIAA has established a partnership with an automotive engineering consultancy firm – Cadman Concepts P/L – to provide a cost-effective option to Trailer manufacturers/ importers who are yet to implement a system for the RVSA.

What are the options for undertaking Conformity of Production?

A business effectively has three options:

1. use Appendix 2 and 3 as a guide and create a QMS internally within your business;
2. use an external business or contractor to create a QMS for your business; or
3. use the initiative created in partnership between CIAA and Cadman Concepts.

BIA strongly recommends members seeking help and assistance with complex assessments consider option 3.

IDENTIFYING ADR COMPONENTS

The second key element of being eligible to obtain these necessary type approvals will be your ability to identify all components used in your Trailer build that have an ADR associated and collect and hold evidence for each component.

Vehicle Type Approvals will cover all of the ADR related aspects of the Trailers. VSS has an **ADR Applicability Summary for Trailers** available on its webpage. This is a useful reference document for Trailer manufacturers and importers in determining which ADRs apply to the particular type of Trailers the business is providing to market.

To supplement this, CIAA has also developed the **ADRs relevant to Towables tool** which assists businesses to identify those common components that are used in towable recreational vehicle builds that have an associated ADR. The tool will identify all relevant components of Trailers.

ADR COMPONENT EVIDENCE

A key feature of the **ADRs relevant to Towables** tool provides, within each ADR within the tool, guidance as to what type of evidence may be considered within your business when compiling this evidence for your type approval.

Businesses will need to consider which ADRs relate specifically to the type of Trailers being provided to market.

The BIA Member Support team is in ongoing discussion with CIAA to ensure the team (and then members) is kept up to date with further changes to the RVSA requirements and importantly the guidance and supporting information available on this matter. BIA members should note that the BIA team are not individually specialists in trailer standards and regulations and are grateful to the support of the CIAA in assisting BIA members with this.

For further information on everything RVSA please go to the **RVSA Ready** website. Or contact the BIA Member Support team in your state or at membership@bia.org.au