

22 Sept 2008

Mr Anant Bellary
A/ Principal Engineer (Vehicle Standards Strategy)
Land Transport & Safety Div
Queensland Transport
PO Box 673, FORTITUDE VALLEY QLD 4006

Dear Anant

Re: Movement of unregistered vehicles

Please find enclosed the submission from the Commercial Vehicle Industry Association of Q'ld on the movement of unregistered vehicles.

This submission is the result of consultation with the members of the CVIAQ Manufacturers Council representing truck manufacturers, distributors and trailer manufacturers.

The Council members were able to suggest a number of possible scenarios where problems could occur and have made recommendations to address these potential breaches of the regulations.

We look forward to further discussion on this topic and a positive resolution of this problem.

Yours sincerely

John Samson
Technical and Regulatory Officer

The Movement of Unregistered Vehicles

The CVIAQ Manufacturers Council met on 10/09/2008 and made a number of recommendations in relation to the movement of unregistered vehicles and the use of Dealer Plates on commercial vehicles.

The meeting examined the issues surrounding the movement of unregistered and or un-complianced vehicles by the manufacturer or his agent.

There are many circumstances where this situation can arise for both truck and trailer manufacturers. The potential cost to the industry of being unable to use the road network to transport and test these vehicles is significant with the use of registered heavy vehicles to transport these otherwise usable vehicles having an impact on the following areas:

- Cost of vehicles will rise to cover transport costs
- Traffic congestion from extra heavy vehicles transporting these vehicles
- Road damage from the extra weight of transport where a truck and trailer are needed to transport a single vehicle
- Environmental damage from extra emissions with the greater weight being transported

Industry has identified the following issues occurring with the use of vehicles with Dealer Plates:

- 1.** ADR compliant vehicles prior to the fitting of the Compliance Plate
- 2.** Uncompleted vehicles prior to completion and prior to fitting of the Compliance Plate
- 3.** Where the ADR compliance of the vehicle is inconclusive
- 4.** Where the vehicle is incomplete and the ADR compliance is inconclusive
- 5.** Where vehicles are driven loaded to GVM for travel to test sites for ADR 35 & 38 testing
- 6.** Vehicles requiring conditional registration
- 7.** In service vehicles where modifications have invalidated the existing compliance

- 1** These vehicles are compliant, but not fitted with a Compliance or Vehicle Plate due to painting or other requirements not affecting their compliance status.

Examples of the type of vehicle that would be covered by this scenario are:

Trailers being sent for painting

Imported vehicles being transported from the wharf to distribution and preparation centres

Industry recommends the following action to correct operational situations where regulations may be otherwise breached:

- Allow operation of the vehicle under Dealer Plate registration by the manufacturer of the vehicle or his agent whilst the vehicle is owned by, or is in the custody of the manufacturer. This operation is only to be used to deliver the vehicle to and from outside suppliers to the manufacturing process.
- Allow operation of vehicles in daylight hours only without fitment of marker plates
- Allow vehicles under Dealer Plate registration to carry a non commercial load consisting of vehicle parts for the Dealer Plate registered vehicle or for similar vehicles, to the same destination being travelled to by the Dealer Plate registered vehicle

- 2** This category of vehicle is able (with lighting exemptions) to comply with the Australian Design Rules, but will not necessarily be equipped to the specification that will apply when finished.

Examples of the type of vehicle that would be covered by this scenario are:

Trailers being sent for sand blasting and painting or other processes not carried out on the premises of the manufacturer.

To ensure safe operation of these vehicles Industry is proposing the following requirements for movements of vehicles in this category:

- Allow operation of the vehicle under Dealer Plate registration by the manufacturer of the vehicle or his agent whilst the vehicle is owned by, or is in the custody of the manufacturer. This operation is only to be used to deliver the vehicle to and from outside suppliers to the manufacturing process.
- Where required vehicles are to be fitted with a light board equipped with stop, tail and indicator lights (Cont)

- Vehicles are to be fitted with rear marker plates
- Vehicles without side and / or clearance lights are to be operated in daylight hours only
- All trailers are to be fitted with an operational brake system suitable for the mass of the vehicle
- All trailers are to be fitted with an operational suspension system suitable for the mass of the vehicle
- All road tyres are to be covered by guards, temporary guards or the trailer deck
- Allow vehicles under Dealer Plate registration to carry a non commercial load, that will not exceed the capability of the braking, suspension or wheels and tyres fitted and consisting of vehicle parts for the Dealer Plate registered vehicle or for similar vehicles to the same destination being travelled to by the Dealer Plate registered vehicle

3 Prototype vehicles are frequently driven to perform Australian Design Rule testing. Until ADR certification testing is conducted and compliance is proven the ADR status of the vehicle is inconclusive.

Examples of the type of vehicle that would be covered by this scenario are:

All vehicles subject to compliance with the Australian Design Rules

Industry recommends the following action to correct operational situations where regulations may be otherwise breached:

- Produce a Letter of Compliance as per Attachment 1 of Vehicle Standards Instruction Number H 16.0 & I 11.0 with the wording "THIS VEHICLE WAS MANUFACTURED TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989" changed to read "THIS VEHICLE WAS MANUFACTURED **WITH THE INTENT** TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989"

- 4 During testing of buses for compliance with ADR83/00 Noise Emission and ADR35/02 Brake Testing, the bus is deliberately left in an incomplete state to achieve the ADR Circular requirement that the lightest vehicle must be tested. The bus is in a roadworthy state in terms of mechanical and electrical equipment, but does not comply with seating and safety requirements for passengers.
- Allow buses to operate using a Dealer Plate for registration for compliance testing purposes only without passenger facilities, as long as lighting and mechanical requirements are functional and passengers are not carried
 - Produce a Letter of Compliance as per Attachment 1 of Vehicle Standards Instruction Number H 16.0 & I 11.0 with the wording "THIS VEHICLE WAS MANUFACTURED TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989" changed to read "THIS VEHICLE WAS MANUFACTURED **WITH THE INTENT** TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989"
- 5 Brake testing for ADR's 35 & 38 require the vehicle to be driven in a fully loaded state to test for compliance
- Allow vehicles undergoing ADR 35 & 38 compliance testing to be loaded with a non commercial load to the vehicles GVM or GTM as required
 - Produce a Letter of Compliance as per Attachment 1 of Vehicle Standards Instruction Number H 16.0 & I 11.0 with the wording "THIS VEHICLE WAS MANUFACTURED TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989" changed to read "THIS VEHICLE WAS MANUFACTURED **WITH THE INTENT** TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989"
- 6 Specialist vehicle manufacturers in Queensland manufacture many vehicles that can only be registered under the Conditional Registration System. These vehicles are often for military or emergency services use. This manufacture results in considerable revenue for Queensland industry and jobs for Queensland workers.
- Allow use of Dealer Plates by manufacturers for test and transport purposes on vehicles that will be allowed Conditional Registration with road access. This use is to be consistent with any restrictions that will apply to the finished registered vehicle.

- 7** Modified in-service vehicles are frequently driven to perform Australian Design Rule testing. Until ADR certification testing is conducted and compliance is proven the ADR status of the vehicle is inconclusive.

Examples of the type of vehicle that would be covered by this scenario are:

In-service vehicles modified under VSB6 being tested at increased GVM or with modifications which invalidate the existing vehicle compliance certification.

Industry recommends the following action to correct operational situations where regulations may be otherwise breached:

- Produce a Letter of Compliance as per Attachment 1 of Vehicle Standards Instruction Number H 16.0 & I 11.0 with the wording "THIS VEHICLE WAS MANUFACTURED TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989" changed to read "THIS VEHICLE WAS **MODIFIED WITH THE INTENT** TO COMPLY WITH THE MOTOR VEHICLE STANDARDS ACT 1989"