

2 March 2026

Amanda Milczarek
Assistant Secretary

Vehicle Safety Operations | Road and Vehicle Safety Division

Department of Infrastructure, Transport, Regional Development, Communication, Sport and the Arts
GPO Box 594 Canberra 2601

VIA EMAIL

Re: ROVER 'Opt in' Approvals and RVSA Requirements for renewals

Dear Amanda,

I am writing to you on behalf of Heavy Vehicle Industry Australia (HVIA) and our members to raise concerns and suggest opportunities for improvement around the current Road Vehicle Standards Act (RVSA) implementation in the ROVER portal for 'Opt in' approvals and future Renewals.

The requirement to complete entirely new submissions for 'Opt in' approvals and renewals comes at a cost to the Heavy Vehicle Industry. Our members have been generally understanding of this as the approval forms used in the previous RVCS system were outdated and limited in functionality. Vehicle and component manufacturers also understand that previous records submitted were at times outdated. However, we have some concerns and suggestions around the departments processing of applications, with a view to not be wasteful of the time and cost which is going into RVSA compliance.

The topics of concern raised by members were:

1. Department resource and processing times of 'Opt in' renewals between now and November 2026.
2. How non-standard approvals are being handed with respect to exemptions already listed on current opt in approvals.
3. What happens 2 and 7 years from now when Component Type Approvals (CTA) and Vehicle Type Approvals (VTA) renewals are due, will double data entry be required? If so, this is not considered a modern approach or acceptable to industry.
4. General Improvements to ROVER

The topics and associated requests are broken down below:

- 1. Department resource and processing times of 'Opt in' renewals between now and November 2026.**

Industry is concerned based on experience that there will be a bottleneck caused by the number of 'Opt in' applications exceeding the number of personnel from the department organised to process applications. Industry believes that 60 days is a very long time to allow for processing which should mostly be automated of approvals. One trailer builder pointed out that they can build an entire trailer in 1/3rd of this time. We are also concerned that those processing may choose to ask questions later in the process when falling behind on processing, simply to reset or pause the 60 day clock. One member stated.

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I submitted 19 x new approvals Between August and November last year, the longest took 98 calendar days (not working days) but most were around 25 to 50 calendar days. In contrast, Vehicle Standards Exemptions for non-standard approvals (PBS split axle groups, etc.) through the NHVR typically took 5 to 10 business days.

An Australian truck manufacturer built four chassis between 12-16 of January 2026. A noise test was performed and passed on 2nd of February 2026. ROVER submission was made 11/02/2026, they are now forced to hold the vehicle and not supply to customers until ROVER update is approved (12 Weeks). As a local manufacturer this scenario results in increasing cost of testing/certification and a major delay to delivering the vehicle to the customer.

Recommendation 1.2:

The department please share with industry the number of 'Opt in' approvals currently in the system. Based on this information, can the department share if there is additional resource planned to assist with processing applications between now and November 2026.

Recommendation 1.2:

The department consider shortening time frames for approvals? As 60 days seems excessive.

2. How non-standard approvals are being handed with respect to exemptions already listed on current opt in approvals.

Non-standard approvals is a main concern raised by members. Test reports and diagrams for trailers and components are typically held and easy enough to collate. However, for many trailers which may be over mass and over width, it has taken trailer manufacturers years to build up the exemptions and/or In Principal Support (IPS) approvals required to build these trailers. We believe it is a time consuming and non-value adding task to attempt to have all these exemptions re-issued for trailers which have been operating already for years.

Recommendation 2:

Where there is an existing 'opt in' approval for a particular non-standard trailer exists and lists exemptions, trailer builders request to be able to use the previous approval with the listed exemptions as evidence when renewing their 'Opt in' approvals. For first time approvals or exemptions, the IPS or relevant exemption will be attached to the submission.

3. What happens 2 and 7 years from now when CTA and VTA renewals are due, will double data entry be required? If so, this is not considered a modern approach or acceptable to industry

Industry appreciates the work which has been done by the department in the past five years to update ROVER and improve the user experience when submitting data. Industry also understands that due to the RVSA Act, there is no real way to avoid 7 year renewal requirements for approvals. However, we have concerns that renewals will require manual data re-entry and essentially brand-new approvals for existing CTAs/VTAs etc. Given how far data handling and technology has come, the outcome of 'double data entry' is not acceptable or beneficial to industry.

The below comments have been made by those submitting applications:

The man-hours involved in re-submitting this information is the killer. There are 16 sections of an approval to complete, some are tick the box, others are more in-depth.

There are 21 x ADRs we have to submit evidence for, and ROVER does not support uploading multiple documents at a time which means we have to clumsily upload single documents at a time which can take minutes per document to upload.

Each application can easily take a couple of hours. For these reasons, we should be pushing for a simple reapplication which can clone the existing approval and allow for easier review by the applicant and assessor.

I had to renew test lab, no renewal process. Current practice is to apply for new test lab. In the application must advise the approval number (TFA) of the existing approved test lab, to keep the old number. Received approval notice for the new test lab, as well as approval/extension for the existing test lab. I kept approval number but had to make new application. Why do I have to pay for processing if nothing has changed? \$370 for test lab.

Recommendation 3.1:

We request that ROVER is updated to allow a true rollover of applications every 7 years as part of the renewal process. This should allow applicants to enter in an existing approval number, bring up the data already submitted, check through the data and then confirm that the information is correct. Such a system would also allow for test reports or circuit diagrams to be updated and data to be corrected if required. Any changes made to these renewed approvals should be captured by the system and communicated to the department assessor when they are processing the application. Any manual re-entry of data should be very limited and avoided where possible.

Recommendation 3.2:

Do not charge for renewal of a test lab or at least reduce the fee as \$370 seems excessive when nothing has changed.

4. General Improvements to ROVER

Members have raised a few topics where ROVER could be updated/improved to streamline industry use.

One area is around First Stage Manufacture (FSM) and Second Stage Manufacture (SSM). Members would like to see better linking in the Register of Approved Vehicles (RAV) between the two manufacturers, so it is easier for FSM's to find SSMs linked to their vehicles and get in contact. Currently FSMS need to complete a series of manual lookups which may not capture all involved. Right now, there is no link between the FSM approval and the SSM approval. This means that a SSM RAV entry can be made to ANY vehicle that is RAV entered even if the FSM entry does not relate to the SSM Approval. Further to this there is no way for an FSM to identify a SSM who references their approval.

The second area is regarding Australian Design Rule (ADR) updates and ADR and ECE (Economic Commission for Europe) Harmonisation handling. There are various instances within ROVER where an ADR has not been updated but an ECE reg has, a version of which is not yet referenced in the ADR.

Typically, manufacturers will seek and are successful in getting Minor and Inconsequential approvals for these differences. However, it would be preferable if ROVER could be updated sooner to capture these pre-approvals, even if the ADR is yet to be implemented.

One example is with ADR 65/00 and lack of reference to UNECE 89 as an alternative standard. Another is ADR 35/07 which references UNECE R13/11. This standard has now been updated to 13/12, but the ADR does not reflect this latest revision.

Recommendation 4.1: Link all SSM VTA to FSM type approval by logic in ROVER. This should also be carried over to the RAV system, thus a SSM RAV entry can only be made to a RAV entry that has a FSM approval linked to the SSM approval.

Recommendation 4.2: Develop process and method of updating ROVER where a Vehicle Standards Exemption is in place. I.e. If an ADR is imminent, don't wait for final release, have a method or alternative path within ROVER at the point in which the variation is approved.

We request the opportunity to meet with the department to discuss each issue and determine a path forward for resolution.

Yours Sincerely,



RACHEL MICHAUD
CHIEF ENGINEER