

Bulletin

Victorian Automobile Dealers Association



Reference No. modification of light cab chassis/mm-7-23

Date: 01/08/2023

Important meeting outcomes with the Department of Transport and Planning (DTP) to discuss the modification of light cab chassis vehicles through the installation of trays and bodies by franchise dealers and LMCTs.

The most recent meeting of the Victorian Automobile Dealers Association (VADA) Parts and Service Group (PSG) was held at VACC House on 10 July 2023.

The meeting was Chaired by Richard Rayner, Fixed Operations Manager from the Brighton Auto Group and was attended by 22 VADA PSG members.

What were the key issues discussed?

The meeting was addressed by representatives from the Department of Transport and Planning (DTP) Vehicle Safety, Partners and Standards Division who regulate critical vehicle safety and inspection schemes for Victoria. Many of you would know DTP as the entity that formally operated under the VicRoads banner.

The important issue regarding the installation of tray and bodies to cab chassis at dealerships and if those installation required certification by a signatory under the Vehicle Assessment Signatory Scheme (VASS) was discussed.

It is important that all VADA members are aware of the discussions held at the VADA PSG meeting and what they may mean for your dealership.

The modification of a light-cab chassis vehicle and the Vehicle Assessment Signatory Scheme (VASS) scheme.

The DTP representatives presented a draft proposal to the meeting outlining the scenarios when the modification of a light cab-chassis vehicle by the installation of a body or tray **should or should not** require certification by a certified VASS signatory as authorised by the DTP so that the modified cab-chassis vehicle could be considered to be compliant to the standards for registration in Victoria.

The scenarios presented and discussed considered modifications made by New Vehicle Dealers, Used Vehicle Dealers and individuals (e.g., members of the public). Common (or typical) modifications discussed included the installation of bodies or trays offered by the Original Equipment Manufacturer (OEM) for that vehicle, non-OEM bodies and trays that were equivalent to the specification of a product offered by the OEM for the vehicle, and non-OEM bodies and trays that were not equivalent to the specification of a product offered by the OEM for the vehicle.

The meeting spoke of processes to clarify the expectations for ensuring cab-chassis light vehicles modified through the installation of trays and bodies remain compliant to the standards for registration as mandated under the *Road Safety (Vehicles) Regulations 2021 (Vic)* (the Regulations). In this regard nothing has changed over the years. Light vehicles provided to market for first use either by a vehicle OEM or through the Federal Second Stage of Manufacture (SSM) allowance must comply to the applicable Australian Design Rules (ADRs). In-service light vehicles may be modified and not require a VASS Approval Certificate if the modifications are as per the allowance of [Vehicle Standards \(VSI\) sheet 8](#).

Modifications made outside the allowance of VSI 8 will require inspection and certification by a VASS Signatory. This has been the case since 2011 and nothing has changed.

What information was tabled at the PSG meeting?

The draft proposal that was tabled and presented by the VASS Scheme Manager for discussion with the forum included a matrix as well as illustrative examples of different installations of bodies and trays to cab-chassis vehicles to help illustrate the type of modification being considered for each scenario.

You can take this [link](#) to see copies of the material that was tabled and presented. Please note that this material was provided only to inform the conversation at the meeting and is to be used as a temporary and unofficial reference tool by dealers.

Work is ongoing within the DTP, who will be looking to engage and consult with the VACC to finalise and align on an outcome.

What is the availability and relevance of the OEMS Body Builders Guidelines?

The PSG advised that most vehicle OEMs provide Body Builders' Guidelines for their cab-chassis light vehicles sold by their Franchise Dealers. Body Builders' Guidelines provide instruction and guidance for the installation of a tray or body to a cab-chassis vehicle to ensure the completed vehicle remains within the OEM's technical specifications.

VADA is keen to hear from VADA members in a bid to understand how many OEMs do, or do not, make their Body Builders Guidelines available to their dealer network.

What were the dealers concerns re modifications?

It was a concern for dealers that some modifications are done outside the dealer network and that the first known requirement for a VASS approval certificate to be issued was when a used modified vehicle was presented to a dealer.

How important is the role for the dealer Licensed Vehicle Tester?

It was advised that it is important for Licensed Vehicle Testers (LVTs) inspecting a used vehicle for the purposes of issuing a roadworthy certificate for a Dealer to be aware of what may cause a tray or body fitted to that vehicle to be considered non-compliant.

What should used car dealers be alerted to?

The PSG discussed and DTP agreed on the absolute requirement for used car dealers to ensure they were familiar with stock that may have trays or bodies fitted that may not meet the standards for registration and whether proof of compliance exists. The prospect of consumer, regulator, or civil action being brought against a dealer and LVT as a result of a non-compliant vehicle being used on the road network is very real in this regard.

The meeting also discussed issues of the on-selling of these vehicles within the private-to-private market and the advantages and hazards they may unearth if not identified early on.

The issue of location and availability of VASS engineers

It was discussed that dealers in parts of regional Victoria may have trouble with reasonable access to a VASS Signatory. The costs associated with the regionally based dealership obtaining certification for a modified vehicle can be prohibitive and either reluctantly absorbed by the dealer or reluctantly passed on to the consumer. This current issue of VACC proximity to many regionally based centers will be further discussed between VACC and the DTP to ensure pragmatic outcomes.

You can learn more about the VASS Scheme and locations of approved VASS engineers by [taking this link](#).

Other

DTP have pledged to keep dialogue ongoing with the PSG to ensure reasonable and sustainable outcomes are identified, considered, aligned and implemented.

VADA will continue to work with DTP and other organisations in ensuring best outcomes for franchise dealers and LMCTs.

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