

29 August 2019



National Transport Commission
Public Submission – Vehicle Standards and Safety
Level 3, 600 Bourke Street
MELBOURNE VIC 3000

**Victorian Automobile
Chamber of Commerce**

ABN 63 009 478 209

VACC House
464 St Kilda Road
MELBOURNE VIC 3004

P: 03 9829 1111

F: 03 9820 3401

W: vacc.com.au

Dear Sir/Madam

The Victorian Automobile Chamber of Commerce (VACC) welcomes the opportunity to provide a response to the National Transport Commission's Issue Paper: Vehicle standards and safety.

VACC is Victoria's peak automotive industry association, representing the interests of more than 5000 members in more than 20 retail automotive sectors that employ over 50,000 Victorians.

Within our membership, VACC represents over 350 commercial vehicle specialists under the Commercial Vehicle Industry Association of Victoria (CVIAV).

VACC provides a response to Questions 6:

“Do we need assurances regarding repairs and replacement parts? If so, could these be achieved using standards?”

VACC maintains industry requires assurances for brake boosters. Our concern relates to the importation of brake boosters – particularly those from China – that do not have any form of assurance or quality control.

If performance data is not supplied by a reputable testing authority, it is not possible to guarantee the ADR 38/xx compliance of a trailer. In-house data, TUV data or data supplied by a reputable independent company is readily available for reputable brands. Further, this information can be relied upon to show ADR 38/xx compliance via calculation.

However, if performance data is *not* available, it is not possible to reliably conduct ADR 38/xx calculations. If estimated performance data is used as an input to ADR 38/xx calculations, or if performance data is *not* obtained from a reputable source, it is not possible to have any confidence in the calculation results.

It is critical that reliable data is available due to the significant variability in the physical and performance characteristics of brake boosters – even if they are the same size designation (E.g. 'Type 24', 'Type 30').

The diaphragm area, diaphragm effective area as a function of pressure and spring brake characteristics can vary significantly between two brake boosters of the same size designation. These characteristics are critical in assessing brake performance via calculation.

Business requires some form of assurance/quality control for imported brake boosters. It has been suggested that brake boosters could be allocated a CRN/SARN and VACC supports this proposal. In doing so, reliability of data would be assured, data would be publicly available for all stakeholders and able to be included within trailer variant submissions made to The Department of Infrastructure, Transport, Cities and Regional Development.

VACC would welcome the opportunity to discuss this issue further with the NTC in the future.

Yours sincerely

Dr Imogen Reid
Industry Policy Advisor
Commercial Vehicle Industry Division

