



## Will the NHVR recognise industry codes?

The National Heavy Vehicle Law gives the Regulator (NHVR) power to register industry-developed Codes of Practice.

Registration would give the Code credence and could provide benefits to people, truck operators or suppliers to the heavy transport sector who can show that they are complying with the Code.

The Regulator can issue guidelines about the format and content of an industry-developed Code of Practice. The Regulator will require that a registered Code be reviewed after a stated period and will identify the organization that is responsible for the revision. The Code must be based upon best-practice principles.

There are already Codes of Practice that have been developed jointly by industry and government. They are listed on the Federal Department of Infrastructure and Transport's website: [www.infrastructure.gov.au/roads/vehicle\\_regulation/bulletin](http://www.infrastructure.gov.au/roads/vehicle_regulation/bulletin). For example, the Heavy Modification Code, VSB 6 can be found there. The Regulator has registered this Code.

There is an urgent need for several industry Codes of Practice to be developed and registered so that real-world problems faced by industry can be tackled. These problems have either never been important to regulators; or the way forward has not been evident. Industry wisdom has much to offer, particularly in technically difficult areas. The question is whether the National Heavy Vehicle Regulator

can grasp the opportunity that the NHVL provides. This opportunity is to engage with the industry to solve some real-world problems without making regulations. So what Codes of Practice are urgently needed? In this article I will describe four. All these are under development by ARTSA.

### 1. PBS Tyre Code of Practice

ARTSA has developed a PBS Tyre Code of Practice so that tyres in a class can be used on a PBS vehicle. The classes are Generic Tyres (class 1, standard tyre class), PBS Tyres (class 2, superior tyre class), and Specific Tyres.

At present, most PBS approvals specify a specific tyre. Consequently, an operator

cannot use other tyres unless the PBS assessor has proven that the vehicle complies with the alternative tyres. This situation is impractical for the future operation of PBS. Further, it hides the need to use superior tyres on A-type vehicles. ARTSA proposes that PBS permit approvals should state that the tyres be from classes 1 or 2 or be a specific tyre (status quo). ARTSA foresees that existing PBS approvals should be reissued with a tyre specification. Operators of PBS vehicles could then choose to replace the original tyres with tyres in tyre class specification based upon an interpretation of the original approval.

Experience shows that 'A-type vehicles'

such as tipper and dog; and road-train combinations, probably will not pass the PBS high-speed transient off-tracking standard, or the yaw-damping requirements unless 'superior tyres' are used. PBS ('or superior') tyres are required that have relatively high centering moments and sidewall stiffness. Superior tyres have values for these parameters that are at the levels shown in the graphs, applicable to the curves for rated load. Neither the Australian Design Rules or the Australian in-service Vehicle Rules regulate these performance parameters. Hopefully, in time, the requirement for superior tyres will flow onto non-PBS combinations that have an A-type part.

ARTSA proposes to establish a register of tyres that are in the Generic and PBS tyre classes. There must be evidence from a tyre-test laboratory that these tyres meet the performance levels specified in the Code. The performance levels for the PBS Tyre class are shown in the graphs. Retreaded tyres can be in class 2 if there is evidence that the action of retreading has not changed the original tyre performance. ARTSA will hold an all-comers meeting in early April 2014 to finalize this Code of Practice.

### 2. Brake Balance Code of Practice

The design rules cannot regulate the brake balance of combinations. Australia has a particular challenge with brake balance because we operate multi-combination vehicles I have written many times about this before. Recently the trailer brake rules ADR 38 was amended to require that new trailers have either load sensing brakes (LSB) or Antilock Brakes (ABS). It is bad practice to mix ABS and LSB in a multi-trailer combination. A national Code of Practice is urgently needed to provide operators with guidance about mixing and matching brake technologies; and particularly when only some parts of a multi-combination vehicle have LSB. ARTSA is trying to get the essential

parts of its brake code adopted as a national code.

### 3. Replacement Brake Friction Parts Code of Practice

ARTSA has developed a Code of Practice for replacement brake-friction materials. There is a serious problem with the certification of replacement brake shoes and pads. Australia's brake certification is based upon vehicle tests according to the specifications in ADRs 35 and 38. These rules do not provide any practical path for validation of replacement brake friction parts, unless they are OEM.

ARTSA has a draft Code of Practice that would provide recognition for replacement friction materials (pads and shoes) that have ADR status (either on a comparable vehicle or as a trailer SARN); have been shown to give comparable performance to an OEM lining in the same grade; or linings that have passed the dynamometer test requirements that are in the USA rule FMVSS 121.

ARTSA foresees that replacement friction materials could get public recognition following verification of satisfactory test performance and continuing compliance with quality assurance standards. This Code is urgently needed to avoid operators finding out the hard way (in court) that the brakes on a truck were defective because they have no ADR status.

It is notable that the SAE in the USA publishes a list of 'registered' aftermarket foundation brakes. The USA solved the problem of after-market foundation brake certification by having a dynamometer test in the brake rule.

### 4. Professional Modifiers Code of Practice

Probably the most urgent Code of Practice of all is for recognition of professional truck and trailer modifiers. The majority of new vehicles (particularly trucks) get modified when they are new. Chassis-cab

trucks might have a body fitted and prime movers often have a fifth wheel fitted by a third party installed. These works need to be done in accordance with the various national standards and codes (such as Vehicle Standards Bulletin No. 6). The National Heavy Vehicle Law makes it clear that modified heavy vehicles need to be inspected, approved and plated by an Accredited Vehicle Examiner (AVE). Up until the 10th February 2014 (when the National Law started in all jurisdictions except for Western Australia), the administrative requirements varied in many places and there was a low compliance level with the requirements that are now required. My September 2013 article discussed the current situation.

Many of the state and territory road agencies have established signatory engineer schemes that accredit individuals to approve modifications for which a VSB6 modification code exists. The National Heavy Vehicle Regulator has identified these engineers as AVEs. Unfortunately there has never been any recognition of professional modifier companies. This has created a dependence on AVEs when the professional modifier is capable in most instances of ensuring that the modification is acceptable. The farcical situation arises that companies that are recognized in the compliance-plate system cannot approve work in the in-service domain.

ARTSA has drafted a Code of Practice that would be applicable to professional modifier companies who can demonstrate a suitable skill level, quality assurance scheme and trained staff. The Code would cover many but not all VSB 6 codes. A standardized checklist for each applicable code is proposed. Participant companies who comply with this code should be allowed to plate vehicles that they modify and this plating should be recognized by the road agencies and by the NHVR. Peter Hart

