

**Accelerating Better Decisions** 



GOOD PRACTICE GUIDE FOR SUPPLY OF REPLACEMENT PARTS FOR USE ON HEAVY VEHICLES



#### **Purpose**

This Guide provides advice to *Operators* of heavy vehicles and *Purchasers* of heavy vehicle parts for those vehicles, about the quality-assurance actions that *Suppliers* of replacement parts should take.

Under the Heavy Vehicle National Law those who are involved in heavy vehicle transport have a duty to ensure the safety of their transport activities, including to ensure their vehicles comply with vehicle standards and are appropriately maintained.

Operators should purchase good-value parts for heavy vehicles that will provide safe, reliable, and legal performance. The use of poor-quality parts leaves the *Operator* vulnerable to expensive breakdowns and reworks, enforcement attention and loss of insurance cover. It also increases the road safety risk, either as the result of part failure or because vehicles that are stopped on roads are a hazard. These risks can be mitigated if *Suppliers* of replacement parts implement the quality-assurance activities specified in this Guide.

Parts suppliers are in a unique position to support operators to meet their primary safety duty obligations through the provision of advice on the quality and compliance of parts they supply.

Suppliers of Parts who comply with this Guide; will identify appropriate technical standards, have validation test reports, keep supply records, review failure reports, and provide installation information. These actions will assist the Supplier to determine and monitor the quality of parts it markets.

The Guide is applicable to all *Suppliers*, be they original equipment suppliers or after-market suppliers. All *Suppliers of Parts* can and should comply with the requirements of this Guide. Suppliers should strive to follow this Guide for parts they supply.

The Guide is applicable to replacement parts, which are used to replace an original part, and for parts that are used to modify a vehicle.

*Purchasers* should buy parts from *Suppliers\** who declare that they supply their replacement parts according to this Guide, so they can be confident that practices are being followed that promote good part quality.

This Guide identifies good practices that will support suppliers, purchasers, operators, and others involved in the servicing or modification of heavy vehicles, to enhance the safety and reputation of the road transport sector.

<sup>\*</sup> Terms in italic text are defined in Section E - Glossary.

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#### **Guide Structure**

The Guide is in five sections:

#### Section A General Principles for the Safe Supply of Replacement Parts

General principles that *Suppliers* and *Purchasers* of parts should follow. This Guide identifies these principles and explains their application.

#### **Section B** Good Practice Guidance for Suppliers of Replacement Parts

Recommended actions to be taken by *Suppliers* that are specific to the safety level of the part.

#### **Section C** Good Practice Guidance for Installers of Replacement Parts

Matters to be considered by *Installers* of *Replacement Parts*.

#### Section D Safety Level Classifications of Common Part Types

The safety classifications of a large range of parts are presented in this Section.

#### Section E Glossary of Terms

Glossary of terms and acronyms that are relevant to this Guide.

## SECTION A - General Principles for Safe Supply of Replacement Parts

#### A.1 **Overview**

This **Guide** identifies good practice advice for suppliers and purchase of Parts that are used on heavy vehicles.

This **Guide** is directed to part suppliers and to consumers of parts. It is intended to inform purchasers, installers and authorities about good practice when specifying, selecting, and supplying replacement parts for heavy vehicles.

The *Part* can be a single item or an assembly of parts that perform a function on a heavy vehicle.

Good practice should result in the installed *Part* meeting legal requirements, and providing acceptable safety, performance, traceability, serviceability, and longevity.

This **Guide** is not a regulation, and it is not a technical standard.

If that advice given in this **Guide** is followed by all participants in the parts supply-chain, operators can expect to experience safe, reliable, and legal operation of vehicles.

Suppliers of Parts to the market should comply with all the applicable recommendations of this **Guide**. These recommendations are in Section A.4 and in Part B.

Suppliers of Parts who claim that Parts they market were supplied in accordance with this Guide, must have evidence that all recommendations that are described in Part B as mandatory (i.e. "shall") were met.

## A.2 Classification of Replacement Parts

There are five classifications of Parts for use on heavy vehicles that are recognised in this **Guide:** 

Original – Replacement of an original part by the same part or a later generation of the original part that is supplied or manufactured by the original supplier.

**Alternative** – Replacement with a part that the original equipment supplier markets as an alternative to the original part.

Approved – A Part (or assembly or parts) that has approval in the Australian Road Vehicle Certification System (RVCS) or its successor, the Road Vehicle Regulator System (ROVER).

Some vehicles may have plant equipment installed. Some parts or sub-assemblies that are used in plant equipment may require approval according to a regulation. Plant-item parts can be Approved parts, but generally, plant item equipment is outside the scope of this **Guide**.

Approved Parts may not be vehicle-model specific and so the part can usually be used on a range of similar vehicles to meet a requirement that is specified in a regulation.

Similar Part – Is a Part that is installed as original equipment on an OEM vehicle that has similar ratings and operational conditions compared to the vehicle that the Part will be installed into.

**Substitute Part** – Replacement of the original part with a substitute part that may have different performance or characteristics compared to the original part and that is not an Alternative part.

If price and supply considerations are set aside, the preferred hierarchy of choices is as shown below. However, value for money is important, so parts of all classifications should be considered assuming they have adequate ratings and quality.

#### **Original Part**

#### Maintains the original specification

#### **Alternative Part**

Is consistent with the original specification, according to the original part supplier

#### **Approved Part**

Has been proven to be acceptable because it has an Australian or International (ECE) approval issued by an authority

#### **Similar Part**

Is used as original equipment on a comparable vehicle

#### **Substitute Part**

Could be acceptable if part quality and performance are adequate

# Modification Part A part that is used to modify the vehicle and that does not replace any prior part.

A Modification Part is not an Original Part because it is used to change the vehicle specification. It could also fit into some of the other classifications.

All these levels could be acceptable if the *Supplier* can demonstrate that the *Part* is supplied according to the recommendations in this **Guide**.

#### A.3 Activities Involving Parts

There are three activities that may require purchase and installation of *Parts*. These are: Service, Repair and Modification:

Service (S) – Routine action to keep the vehicle in an acceptable

mechanical condition that may involve installation of

replacement parts.

**Repair (R)** — Maintenance of functionality after failure that may

involve installation of replacement parts.

**Modification (M)** – A change of functionality from the original specification

that may involve installation of parts.

Parts used for all these activities should be purchased from a *Supplier* who declares that the *Part was* supplied according to the recommendations in this **Guide**.

#### A.4 Good Practice Principles

- 1. The **Guide** is mainly concerned with the performance and function of the *Part* and not the installation of the *Part*. However, installers and modifiers have a duty of care to ensure that the vehicle is safe with the *Part* installed. Note that road agencies require many types of modifications to be approved by an accredited person, such as an Approved Vehicle Examiner (*AVE*).
- 2. This **Guide** defines good practice for the supply of parts, whether they are used for Service, Repair or Modification. Part suppliers may not know what purpose the part has been purchased for. Therefore, this **Guide** should apply generally to the supply of parts for heavy vehicles into the Australian market, irrespective of the intended activity.
- 3. Replacement of an *Original Part* by the same part or an *Alternative Part* is safe practice for the operator, assuming no defect or safety recall has been identified for the *Replacement Part*.
- 4. Replacement of an *Original Part* by an *Approved Part* is safe practice, assuming that the rating of the *Approved Part* is suitable for the application and no safety recall has been identified for the Replacement part.

- 5. Replacement of an *Original Part* by a *Substitute Part* is only safe practice if the *Substitute Part* has a suitable rating and no safety recall is applicable for the *Part*. Assessment of the quality of the *Substitute Part* is the responsibility of the *Purchaser* after taking note of the claims made by the *Supplier*.
- 6. A *Part* that is a sub-part in an *Assembly* does not inherit the approval status of the *Assembly* unless it has been tested in the approved assembly.
- 7. Irrespective of the *Safety Level* of the Part, *Purchasers* should purchase parts for which the *Part Supplier* claims are supplied in accordance with this **Guide**.
- 8. It is the responsibility of the *Part Supplier* to be able to validate claims made about parts. Validation testing may be required, even if the *Supplier* has no legal obligation to do so.
- 9. Suppliers of *Original Equipment Parts* or *Alternative Parts* have no special status in this **Guide**. They should supply *Parts* according to the requirements of this **Guide**.
- 10. Approved Parts shall have current approval status with the applicable regulator.
- 11. The performance ratings of a part shall be public information.
- 12. Some of the **Guide** recommendations will involve business systems for design, quality assurance and record keeping that the *Part Supplier* has established and operates. These are necessary but not sufficient to ensure safety of the *Part*. The *Part* must also have an adequate and proven rating.

## A.5 **Safety Levels**

This **Guide** graduates the advice according to *Safety Level*. The Guide adopts a risk approach. That is, the actions that suppliers should take before supplying a part depend upon the consequences of failure.

The safety levels are:

#### Safety Level 1 Safety and compliance critical

There is a significant risk that failure of the part could cause:

- A serious road incident.
- A serious risk of fire.
- Loss of driver/operator safety protections.

Make the vehicle illegal to use.

#### Safety Level 2 Safety and compliance relevant

There is a significant risk that failure of the part could:

- Cause a loss of function or degraded performance of the vehicle.
- Disable the vehicle.
- Create a hazard.

Make compliance with the design rules uncertain.

#### Safety Level 3 Minor safety relevance

Failure of the part:

- Could cause a loss of function that is unlikely to disable the vehicle but will be inconvenient.
- Does not make the vehicle illegal on the road.

#### Safety Level 4 No evident safety or compliance concerns

• Failure of the part is unlikely to affect the safety, function or legal status of the vehicle.

#### Safety Level X The item is probably illegal to sell

A further graduation risk exists according to the warning of pending failure that is likely to occur:

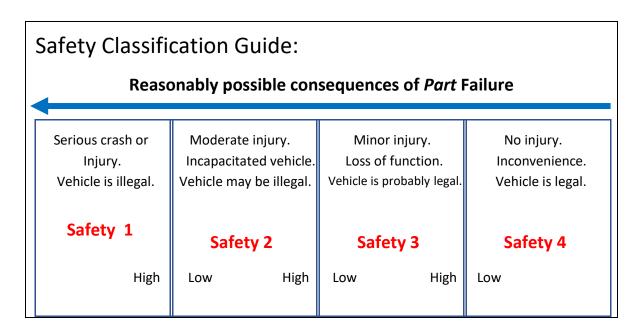
• **High:** Failure is likely to occur without warning.

• **Low:** Failure is likely to occur with warning.

If a part failure is likely to occur with warning, an alert driver could take action to reduce the consequence of the failure. Thereby the risk is lowered.

When there is doubt about the likely consequences of failure, these graduations should be used. If the graduation is High, then classify the Part into the higher safety level. If the graduation is Low, classify the part into the lower safety level.

A component within a part assembly inherits the *safety level* classification of the assembly unless a detailed analysis shows that the component has a lower *safety level*.



## A.6 Legal Requirements

Under Australian Consumer Law, suppliers of parts must only supply parts that are fit for purpose and are safe. The law requires that an unsafe part be formally recalled according to a public safety recall. A part that is safe but not fit for purpose must be corrected. Notwithstanding the preceding comments, this Guide does not present a comprehensive Guide to legal responsibilities of suppliers of parts. The reader is encouraged to consult the ACCC guidance documents.

This Guide recognises that a *Part Supplier* into the Australian market may not be the *Part Manufacturer*. However, the legal obligations arising under Australian

consumer law may apply to the *Part Supplier* as if it was the physical manufacturer. Consequently, the *Part Supplier* has substantial responsibilities.

Part Suppliers should take note that defects in parts could result in a legal obligation to recall a part. Quality checks to ensure that parts are safe, and record keeping facilitating a safety recall should one be required, are legal obligations.

Installers and modifiers of vehicles should be aware of requirements in the Heavy Vehicle (Vehicle Standards) National Regulations and similar jurisdictional regulations that require a vehicle to comply with specified performance and design requirements; and in general, to continue to comply with Australian Design Rule requirements that were applicable when the vehicle was made. There could also be technical standards that a *Part* should meet depending upon the application.

According to the National Heavy Vehicle Law and jurisdictional regulations, many modifications of heavy vehicles must be approved by an authorised person (an AVE). A modification is a (substantive) change of the Original Equipment Manufacturer's specification for the vehicle. One element of the approval assessment is that the *Parts* are suitably rated and meet mandated standards.

Part installers should be aware that legal requirements may exist under occupational health and safety regulations that are additional to those arising from vehicle standards regulations.

This Guide does not provide an alternative path to meeting the requirements specified in a regulation. Some types of parts (e.g. mechanical couplings and seatbelts) usually have an individual approval that is either issued by, or is acceptable to the Federal regulator (the Vehicle Standards Section in Department of Infrastructure, Transport and Regional Development). Compliance with this Guide <u>is not</u> an alternative to obtaining the required approval.

Chain of Responsibility requirements apply to the road transport logistics industry.

The supply of unsafe parts renders the *Part Supplier* vulnerable to legal sanction.

## **SECTION B - Good Practice for** *Part Supply*

The word "shall" identifies a mandatory aspect of compliance with the Guide. The word "should" identifies a recommended aspect of compliance with the Guide.

## B.1 Requirements for Safety Levels 1, 2 & 3

## **B1.1** Technical Standards

1. The *Supplier* shall identify technical standards that apply to the type of part being marketed.

Notes: i). It may be that no such technical standards will be identified.

- ii). There may be technical standards that are relevant to the material properties of the type of part, even though the type of part is not described in the technical standard.
- 2. The *Supplier* should determine whether the *Part* complies with one technical standard(s) identified in Item 1.

## **B1.2** Information Requirements

- 3. The ratings of the *Part* that are relevant to safe operation shall be publicly declared (e.g. output torque values or friction grading for brake friction lining, D-value of coupling, load limit and wheel rim specification for an axle, bearing load rating, etc.).
- 4. Fitting instructions including required torques, operating limits, checks to verify correct installation and key safety information, shall be made available to the public.
- 5. If there are multiple ways to use the *Part*, operating instructions shall be provided.

6. Individual part numbers and manufacturers/supplier's identification shall be clearly visible on the *Part* or its packaging.

The Supplier should put a "QR Code" or similar web link onto the packaging that will allow the user to find the public information about the part.

## **B1.3 Design Procedure Requirements**

- 8. Parts shall be manufactured to an engineering drawing or specification that shows dimensions, tolerances and material specifications. Material
  - properties that are important for safety, performance, or longevity, shall also be specified.
- 9. Suppliers who are not Manufacturers shall verify the correct performance and installation information from the Manufacturer, or if this cannot be achieved, otherwise verify that the claims it makes for the part are valid.
- 10. When design or significant manufacturing changes are made to a part, the part number or its revision level shall be changed. The reason for the change shall be documented in the technical file.
- 11. The Supplier shall keep records that identify the date, quantity of supply and batch number of each part that it manufactures or receives from the manufacturer.

## **B1.4 Quality Assurance Procedures**

- 12. The Supplier shall have quality assurance procedures in place that verify continuing compliance with the applicable standards or safety performance levels. This process is to be documented in the supplier's quality assurance procedures. The supplier can rely upon the QA procedures that the manufacturer asserts it follows.
- 13. The Supplier should follow ISO 9001 / AITF 16949 quality assurance principles and practices, or some other QA standard that has comparable requirements.

- 14. Parts that are subject to a safety recall shall be withdrawn from sale and quarantined at the earliest opportunity.
- 15. Parts that the Supplier assesses could be defective shall be withdrawn immediately from sale and quarantined. The supplier shall then resolve any doubt about the acceptability or otherwise of the part.
- 16. Not all parts that are defective need to be safety recalled. If a *Safety Recall* is unnecessary but the *Part* is defective, the supplier shall act to correct the *Part* that has been supplied into the market.

## **B1.5** Record Keeping

- 17. The Supplier shall keep records that identify the date, quantity of supply and batch number for the Part that it supplies to the market.
- 18. The supplier's records shall be retained for at least seven years unless another period is specified in a regulation.

The *Supplier* shall keep a *Technical File* with information substantiating any claim of compliance with this Guide. The technical file should at least:

- Identify legal requirements and provide evidence of compliance.
- Show typical markings that identify part numbers and standards (ECE markings, UL, DOT etc.).
- Identify the part-number history of the part (it is recognized that part numbers of a part can change for various reasons over time).

The *Technical File* need not be made public.

## **B1.6** Consumer Complaints and Warranties

19. The Supplier should establish a complaint-resolution procedure to deal with substantive complaints about poor performance, failure or significant installation problems. Complaints shall be documented, and the records shall describe the complaint or failure and show the resolution of each complaint. The complaint or its resolution need not be public information.

- 20. The Supplier should record reports of failure of the Part and attempt to determine the conditions under which the reported failure occurred. Periodically the Supplier should review the failure records and determine whether unexpected failure rates are occurring, and if so, determine the cause(s) of failure.
- The *Supplier* shall have a written warranty policy that is made available to a *Purchaser* upon request. This policy shall take account of legal requirements in the Australian Consumer Law.

#### B.2 Additional Requirements for Safety Level 1 & Level 2 Parts

## B2.1 Information Requirements for Safety Level 1 & 2 Parts

1. Parts (or the assembly if applicable) should have a durable serial number and/or a batch identification that is visible when the part is in service. This requirement is intended to assist with tracing of parts if part problems or performance problems are identified later.

## B2.2 Record Keeping for Safety Level 1 & 2 Parts

- 2. The *Supplier* shall keep records that identify the date, quantity of supply and batch number for the part that it supplies to each sub-supplier. The information should be enough to allow a batch of parts to be traced should a safety recall be necessary.
- 3. The *Supplier* shall attempt to determine the cause of each failure of a *Part* that is reported to it and shall document whether the failure indicates that a safety recall or a *campaign* recall should be conducted.

## B2.3 Additional Design Procedures for Safety Level 1 & 2 Parts

4. If the part number is revised so it carries the same base number, the revised parts shall be backward compatible. That is, can be installed into prior installations.

## B2.4 Test Standards for Safety Level 1 & 2 Parts

- 5. The design, performance and dimensions specified in a regulation shall be proven by laboratory-level tests conducted on a typical part.
- 6. Where verification or certification tests are needed to fulfill legal requirements, these should be done by a laboratory that is accredited by an authority. For example, the laboratory either has a Technical Facility Number (TFN) or is accredited under a national laboratory accreditation program (e.g. AS, NATA, TIF, JIS, RVD,..).
- 7. The *Supplier* should publicly declare where applicable the technical standard that the part complies with.
- 8. If the *Supplier* is not the manufacturer, the Supplier shall obtain a copy of the test report or the approval certificate from the Manufacturer, or
  - otherwise verify the performance of the Part by tests or assessments that are documented.
- 9. A copy of the test report or the approval certificate shall be kept by the *Supplier* in the Technical File for the part. This information need not be made public.
- 10. When the part number applicable to a Part is changed, an assessment shall be made by an appropriately qualified person to determine whether certification-level testing should be redone. The outcome of this assessment shall be noted in the technical file.
- 11. When comparison testing against an *Original Part* is conducted, the procedures and limits specified in UN Regulation 90 should be used as a Guide.
- 12. When comparison testing of brake friction material is conducted against an *Original Part*, the procedures and limits specified in UN Regulation 90 shall be followed.

13. At least every ten years the *Supplier* shall commission or perform tests on a representative *Part* or *Parts*, to verify that the *Part* meets the specification.

## **SECTION C - Good Practice Guide for Installers of Parts**

- 1. Determine the safety level of the part. The safety of the vehicle depends upon the Part being reliable and correctly installed. *Safety Level 1* parts are safety critical. When you think the installation is finished, check and mark.
- 2. A part should have a part number, either on the part or on the packaging. Determine the part number and if you have any doubt, check it is correct for the vehicle or application that you are putting it into.
- 3. If you are concerned that the part quality is unacceptable, or that the rating may be inadequate, do not install it. Direct your concern about the part to your manager or to the client, pointing out the problem.
- 4. Installation instructions may be important for *Safety Level 1, 2 & 3* parts. If they are not provided, ask the purchasing officer to get them from the Supplier.
- 5. The rating of the part should be stated on the installation literature or website.
- 6. Always check that the ratings of the part are adequate for the job.
- 7. You may be asked to install a part that seems to be defective or is not in serviceable condition. Ask the purchasing officer or the client for another. Parts shall be fit for purpose.
- 8. Don't take the rap for installing a deficient part!

## **SECTION D - Safety Level Classification of Common Part Types**

(These lists are not exhaustive)

#### D.1 Level 1 Parts

Auxiliary – Safety 1		
Part Type	Technical Requirements	Safety and Compliance Risk
Vehicle jack	ACCC reference to AS 2615:2016, Hydraulic trolly jacks.	Vehicle drops when being maintained.
Burst valve protection for hydraulic lifting cylinders	(VSB6 Code R1).	Unexpected drop in the event of a hydraulic hoe bursting

(standards inside brackets are relevant to the system that the item is in)

Brake System Components – Safety 1		
Part Type	Technical Requirements	Safety and Compliance Risk
Spring-brake control valve on the truck	ADR 35 performance requirements exist, (VSB6 G4).	Unexpected release of parking brake
Spring-brake relay valves	No. (ADRs 35&38#, VSB6 G3 & G4).	Unexpected application of the parking brake
Service brake foot valve on the truck	No. (ADRs 35&38#, VSB6 G3).	Loss of service brake effect
Service brake relay valve	No. (ADRs 35&38#, VSB6 G3 & G4).	Loss of service brake effect
Vehicle Stability Control (VSC). Also called Electronic Stability Control (ESC).	Yes. ADR 35 and 38 design and functional requirements exist for VSC.	Loss of vehicle stability control protection

<sup>#</sup> ADR s35 & 38 require brake parts to comply with a national or international standard {AS, SAE, BS, JIS, DIN, ISO, UNECE}, but are not specific about the standard.

(standards inside brackets are relevant to the system that the item is in).

No in the Technical Requirements column means there is no technical standard that is specified in an Australian vehicle standard regulation, and no technical standard has been identified here.

Mechanical Couplings and subcomponents – Safety 1		
Part Type	Technical Requirements*	Safety and Compliance Risk
		Possible trailer separation
Automatic Pin Coupling	CRN or UNECE, ADR 62 (VSB6 P1).	
Ball coupling	CRN or UNECE, ADR 62, (VSG16, VS6 P1).	Possible trailer separation
		Possible trailer separation
Fifth Wheel	CRN or UNECE, ADR 62, (VSB6 P2).	
		Possible trailer separation
Fifth Wheel angle	Adequate strength, (VSB6 P2).	
Fifth wheel mounting		Possible trailer separation
plate	Adequate strength, (VSB6 P2).	
		Loss of kingpin leading to trailer
Trailer skid plate	Adequate strength, (VSB6 P2).	separation
Pintle hook coupling	CRN or ECE, ADR 62, (VSB6 P1).	Possible trailer separation
Towbar	CRN. ADR 62, (VSB6 P1).	Possible trailer separation
		Possible trailer separation
Towing kingpin	CRN or UNECE, ADR 62, (VSB6 P1).	
	Adequate strength. CRN is not	Possible trailer separation
	issued for a turntable alone. (VSB6	
Turntable	P1).	
Rear Axle and Suspensio	n – Safety 1	
Part Type	Technical Requirements	Safety and Compliance Risk

Part Type	Technical Requirements	Safety and Compliance Risk
Rear axle beam	Adequate strength, (VSB6 D1).	Loss of directional control
Rear suspension structural elements including sway bars	Adequate strength, (VSB6 D1).	Loss of directional control
Rear differential	Adequate strength. (VSB6 D2, adequate gradeability and startability).	Loss of directional control. Loss of drive capability.

Steering System and Front Axle – Safety 1		
Part Type	Technical Requirements	Safety and Compliance Risk
Front axle beam	Adequate strength, (VSB6 E1).	Loss of steering control
Front suspension spring (mechanical or airbag)	Adequate strength, (VSB6 E1).	Loss of directional control
Front suspension U- bolts	Adequate strength, (VSB6 E1).	Loss of directional control
Steering Arm, Pitman Arm and Draglink	Adequate strength and dimensions, (VSB6 E2).	Loss of directional control
Steering box	Adequate rating, (VSB6 E2).	Loss of directional control
Steering hoses	Adequate pressure rating, (VSB6 E2).	Loss of directional control
Steering kingpin	Adequate strength, (VSB6 E2).	Loss of steering control
Universal joints for steering column	Adequate strength, (VSB6 E2).	Loss of directional control

(standards inside brackets are relevant to the system that the item is in)

Tyres and Wheels – Safety 1		
Part Type	Technical Requirements	Safety and Compliance Risk
Steer Tyre	UNECE R24, (VSB E3).	Loss of steering control
Front wheel rims	DOT, (VSB6 E3).	Loss of steering control

## D.2 Level 2 Parts

Brake System Compone	nts – Safety 2	
Part Type	Technical Requirements	Safety and Compliance Risk
Air brake valves generally	No / Trailer SARN (ADRs 35&38#, VSB6 G3 & G4 VSB6 G4).	Loss of braking performance
Antilock Brake System (ABS)	Design and performance standards exist in ADRs 35 and 38, (VSB6 G3, G4).	Loss of wheel lock-up protection. Loss of B-double prime mover legal status.
Brake Actuator	Refer to ATA/ITC TAP Compliant brake chambers V2.1, January 2017. ADRs 35 & 38 require parts to comply to a national or international standard but are not specific. Trailer SARN.	Loss of service brake or park brake action at one axle
Brake Air tank	Note that large volume tanks may be pressure vessels under OH&S	Loss of service brake or park brake action at multiple axles
	regulations. Capacity requirements exist in ADRs 35 & 38, Trailer SARN.	
Brake drum	No/Trailer SARN (ADRs 35&38#, VSB6 G3 & G4, ECE Reg 90).	Loss of service brake or park brake action at one axle
Brake warning lamps	No. ARR 35 specifies functionality and colour.	Loss of warning information
Disc brake calliper	No/Trailer SARN (ADRs 35&38#, VSB6 G3 & G4).	Loss of service brake or park brake action at one axle
Disc brake pad	No/Trailer SARN. (ADRs 35&38#, VSB6 G3 & G4, ECE Reg 90).	Loss of service brake or park brake action at one axle
Disc brake rotor	No/Trailer SARN. (ADRs 35&38#, VSB6 G3 & G4).	Loss of service brake or park brake action at one axle
Drum brake shoe	No/ Trailer SARN. (ADRs 35&38#, VSB6 G3 & G4).	Loss of service brake or park brake action at one axle
Exhaust brake	No. ADR 80 noise limits exist	Loss of some braking affect
Brake air hoses	No/Trailer SARN. (ADRs 35&38#, VSB6 G3 & G4).	Loss of brake function at multiple axles
S-cam mechanism for drum brakes	No/Trailer SARN. (ADRs 35&38#, VSB6 G3 & G4).	Degraded brake performance or wear performance at one axle.

# ADRs 35 & 38 require brake parts to comply with a national or international standard {AS, SAE, BS, JIS, DIN, ISO, UNECE}, but are not specific about the standard.

No in the Technical Requirements column means there is no technical standard that is specified in an Australian vehicle standard regulation, and no technical standard has been identified here.

Cabin Components – Safety 2		
Part Type	Technical Requirements	Safety and Compliance Risk
Driver seat with integral seatbelt	Yes. ADRs 3, 4, 5 are applicable, (VSB6 K1, K2, K3).	Loss of driver seatbelt protection
Seatbelts	Yes. CRN or UNECE, (VSB6 K1, K2, K3).	Non-compliance. Loss of occupant safety protection
Side window glass	Yes. ADR 8. AS2080, UNECE R34, BS AU178, JIS 3211, (VSB6, K1, K2, K3).	Non-compliance. Loss of occupant safety protection
Speedometer	Yes. ADR 18 requirements to be met.	Loss of accurate speed indication results in safety vulnerability
Windscreen	Yes. ADR 8. AS2080, UNECE R34, BS AU178, JIS 3211, (VSB6, K1, K2, K3).	Non-compliance. Loss of occupant safety protection. Poor visibility of road
Windscreen wiper rubbers	No, (ADR 42).	Loss of windscreen wiping effectiveness as specified in ADR42. Premature wear
		Difficulty for driver to grip wheel. Some jurisdictions require steering wheel diameter to be at least 300mm irrespective of vehicle category. Inadequate spline hardness
Steering wheel	No, (ADR 42).	could result in loss of steering control.

Chassis Components – Safety 2		
Part Type	Technical Requirements	Safety and Compliance Risk
Chassis rail	No. Adequate strength. Match OEM chassis rail material grade, (VSB6 H4).	Cracking of a chassis rail could lead to poor road handling or loss of directional control.
Cross-members and cross-member brackets	No, match OEM cross-member strength, (VSB6 H4).	Cracking of cross-members could lead to poor road handling.
Front Underrun Protection (FUPS) bar	Yes. ADR 84, CRN, (VSB6 H6 & H7).	Non-compliance with ADR 84 under-run requirements
		Headlights and direction indicator lights obscured. Protrusion risk to other road
Bullbar	(ADR 42), (VSB6 H4, H7)	users.

Engine and Drivetrain Components – Safety 2		
Part Type	Technical Requirements	Safety and Compliance Risk
Driveshaft	(VSB6 C1)	Loss of traction. In extreme cases, mechanical damage to the chassis and/or loss of parts endangering other road users.
Universal joints in tailshaft	(VSB6 C1)	Loss of traction. Mechanical damage if driveshaft falls off. Debris on roadway.
Electric starter motor cables	No. Fire retardant properties desirable.	Fire risk
Exhaust Muffler	ADR 80 & 83 performance requirements, (VSB6 A4).	Non-compliance with ADR requirements.
Exhaust pipe	ADR 80 & 83 performance requirements, (VSB6 A4).	Non-compliance with ADR requirements.
Diesel Engine	SARN, ADR 80, (ADR 65 speed limiting requirements exist), (VSB6 A1, A5).	Emission compliance and speed limiting non-compliance.
Steering pump	No, (Force rating), (VSB6 E2).	Loss of steering system effect
Power steering hoses	SAE & DIN standards exist but are not mandated, (VSB6 E2).	Loss of steering performance
Transmission	No. (ADR 65 speed limiting requirements exist), (VSB6 B1).	Non-compliance with speed limiting requirements, and noise performance.

		Non-compliance with ADR 83
Turbocharger	No, (ADR 83), (VSB6 A3).	emissions requirements.
		Loss of braking performance.
	ADR 64, (ADRs 35&38#, VSB6 G3 &	Non-compliance with Roadtrain
Air compressor	G4).	air supply performance.
	SAE & DIN standards exist but are	Fire risk. Risk of dropping body
Hydraulic hoses	not mandated, (VSB6 R1).	or load

Load carrying and Tiedown Components – Safety 2		
Part Type	Technical Requirements	Safety and Compliance Risk
	No. Load Restraint Guide id	Breakage of tie-downs leading
Load tie-downs	relevant.	to moving loads.
Side curtains	Yes. Load Restraint Guide is relevant.	Loss of load
Side gates for trays	Yes. Load Restraint Guide is relevant.	Loss of load

(standards inside brackets are relevant to the system that the item is in)

Lighting – Safety 2		
Part Type	Technical Requirements	Safety and Compliance Risk
Headlamps and		Non-compliant headlights. Loss
taillamps	Yes. CRN, ADR 46, or UNECE.	of some visibility
	Yes. CRN applicable to ADRs 50 &	
Fog lights	52.	
	Yes. CRN applicable to ADRs 1, 6,	Non-compliance. Loss of correct
Signal Lamps	45, 48, 49, 51, or UNECE.	visibility to other road users.

(standards inside brackets are relevant to the system that the item is in)

#### Wheels, Axles and Suspensions - Safety 2 **Part Type Technical Requirements Safety and Compliance Risk** Wheel rims (Not front Cracking of wheel rims. Wheel axle) Yes, DOT marking detachment Breakdown. Loss of directional Non-steering axle No, (VSB6 D1) control Loss of steering control. Fire Wheel bearing No. risk. No. (Road Friendly Suspension Non-compliance with RFS status must be maintained), (VSB6 requirements. Loss of Shock absorber D1, D2, F1, F2). suspension effectiveness. Loss of suspension effect at one No. (Road Friendly Suspension location. Poor road handling. status must be maintained), (VSB6 Non-compliance with RFS Suspension Airbag D1, D2). requirements.

(standards inside brackets are relevant to the system that the item is in)

#### D.3 Level 3 Parts

Chassis Components – Safety 3		
Part Type	Technical Requirements	Safety and Compliance Risk
Brake hose clamps	No.	Loss of brake function, mainly at one axle.

No in the Technical Requirements column means there is no technical standard that is specified in an Australian vehicle standard regulation, and no technical standard has been identified here.

Cabin Components – Safety 3		
Part Type	Technical Requirements	Safety and Compliance Risk
Cabin structural		Cracking of the cabin
members	No.	
Sunvisor	Not for heavy vehicle categories.	Loss of occupant protection.  Reduction in visibility in some  circumstances.
Cabin steps	OH & S safety considerations.	Breakage causing loss of functionality.
Grab handles	OH&S safety considerations.	Breakage causing loss of functionality.

Electrical Components – Safety 3		
Part Type	Technical Requirements	Safety and Compliance Risk
Batteries	No, but cables need to be restrained.	Fire and explosion risk
Electric looms generally	No, but cables need to be restrained.	Fire risk
Electrical circuit breakers	No, (ADR 64), (Manual reset circuit breakers specified for B-double and Roadtrain circuits).	Fire risk.
Electrical fuses	No.	Fire risk
Electrical leads for trailers	No, (pin positions specified in ADR 42)	Fire risk. Loss of lighting functions on trailer.

Engine and Drivetrain Components – Safety 3		
Part Type	Technical Requirements	Safety and Compliance Risk
Air filter	No, (ADR 80, VSB6 A2).	Loss of emissions compliance because intake restriction if excessive. Engine dusting risk
Instrumentation generally (not speedometer)	No.	Loss of driving information. Inaccurate readings.
Radiator	No, (Engine manufacturer's cooling requirements exist).	Loss of engine performance
Retarder	No.	Loss of braking assistance
Oil filter	No.	Loss of engine safety
Engine-Brake	No, (ADR 80).	Loss of braking assistance
Bug Deflectors	No (ADR 42, TIC Code of Practice re Adequate Field of Vision).	Loss of road visibility on long- bonneted trucks
Hydraulic controls generally	No. (OH&S requirements exist).	Safety control performance
Fuel filter	No, (ADR 80).	Loss of filter performance. Fuel delivery restriction leading to loss of power
Thermal fan clutch	No, (ADR 83).	Loss of engine performance
Fuel tank addition	No.	Risk of fuel loss onto roadway
Starter motor	No.	Loss of starting function

		Change of air intake restriction
Intercooler	No, (ADR 80, VSB6 A2).	level could alter emissions status

(standards inside brackets are relevant to the system that the item is in)

Lighting – Safety 3		
Part Type	Technical Requirements	Safety and Compliance Risk
Reflectors	Yes. CRN - ADR47), or UNECE	Non-compliant visibility for other road users.
Beacon lightbar	Colour and visibility requirements exist in ADR 44	Loss of performance that is mandatory for some special purpose vehicles.
Flashing amber warning lights	Colour and visibility requirements exist in ADR 44	Loss of performance that is mandatory for some special purpose vehicles.

(standards inside brackets are relevant to the system that the item is in)

Wheels, Axles and Suspe	nsions – Safety 3	
Part Type	Technical Requirements	Safety and Compliance Risk
Metal mudguards	No (ADR 42)	Non-compliance with ADR 42.  Loss of mudguard.
Plastic mudguards	No (ADR 42)	Non-compliance with ADR 42.  Loss of mudguard.
Rear-axle tyres	Yes, ECE R24	Poor tyre grip.  May be relevant to  PerformanceBased Standards  (PBS) status
Panhard Rods for Suspension	No	Inadequate strength could result in cracking of the axle.
Suspension bushes	No	Inadequate resilience could result in premature failure and loss of directional control.

## D.4 Level 4 Parts

Part Type	Approval Applicable	Likely Failure Outcome
Radio Antenna	No. Height restrictions exist in ADR 43	In extreme cases, risk of touching power lines
Power Take Off (PTO)	No, (VSB6 B1).	Loss of function
Cooling fan	No, (VSB6 A1).	Loss of function. Change of noise compliance (ADR 83)
AdBlue tank	No	Loss of function. Engine derating. Noncompliance with ADR 80.
Bonnet emblems	No	Road debris risk.
Cabin trim	No	Safety risk inside the cabin.

(standards inside brackets are relevant to the system that the item is in)

## D.5 Level X Parts

Part Type	Technical Requirements	Legal Situation
Re-webbed seatbelts	Re-webbing might be considered if the seatbelt is frayed or if the seatbelt has experienced a severe collision. Rewebbing is unacceptable to State and Territory road safety agencies.	It is illegal in most jurisdictions to sell used road-vehicle seatbelts that have been re-webbed.
Asbestos in Parts	Prior to the late 1970s Asbestos hoses, brake linings, clutch plates, gaskets, exhaust laggings, mufflers, valve rings etc. Technical standards either did not exist or have been withdrawn.	Asbestos is a prohibited import. Asbestos is prohibited in automotive parts by State and Territory Regulations
Refrigeration gases that are not acceptable in Australian vehicles	Propane has been used as a cheap and effective refrigeration gas. Propane presents a significant fire and explosion risk if it leaks out near to an exhaust.	

## **SECTION E - Glossary**

- Alternative Part A part that the supplier of the Original Part markets as an alternative to the Original Part.
- Approved Part A part that has been approved by an authority for use at a stated performance level.
- Campaign a recall of a part that is not reported to the ACCC.
- Chain of Responsibility legal requirements in the Heavy Vehicle National Law applicable to defined parties who could affect the safety of heavy vehicles.
- CRN Component Registration Number An approval issued via the RVCS for certain type of parts. See Part C for a list of types.
- CTA Component Type Approval An approval for a part that is issued via ROVER for certain types of parts. See Part C for a list of the types.
- Installer The person or entity that installs the *Part* into the vehicle. This person may or may not be the *Supplier* or the *Purchaser*.
- *Manufacturer* The person or entity that manufactured the *Part*.
- *Modification Part* A part that is used to modify a heavy vehicle.
- Original Part A part that was originally supplied and installed by the vehicle manufacturer or its agent.
- Part A physical item intended to perform a function that could be used on a heavy-vehicle either as a replacement part or as a modification part.
- *Purchaser* The person or entity that purchases the *Part* from the *Supplier*.
- Replacement Part A Part that is used to replace a previously installed Part.
- RVSA Road Vehicle Standards Act (2018) This Act of the Federal Parliament that supersedes the Federal Motor Vehicle Standards Act (1989).
- RVCS Road Vehicle Certification System. The system of administration of new road vehicles and certain types of parts for supply to the market in
   Australia. The RVCS is established by the Federal Motor Vehicle Standards Act (1989).

- ROVER The system of administration of new vehicles and some types of parts that is established by the Road Vehicle Standards Act (2018).
- SARN Sub Assembly Reference Number An approval issued by the RVCS for certain type of sub-assemblies of parts. See Part III for a list of types.
- Safety Level The safety classification based upon safety or compliance risk. This level is 1, 2, 3, 4 or X, as described in Section A5.
- Safety Recall a recall of a part that is reported to the ACCC.
- Similar Part A part that is an Original Part on a comparable vehicle and that could be used as a Replacement Part on an identified alternate vehicle.
- Substitute Part A part that could be used as a Replacement Part that is not an Original, Alternative, Approved or Similar Part.
- Supplier / Part Supplier The person or entity that markets the Part for use on heavy vehicles in Australia.
- Technical File A file of information either stored electronically or physically, that describes as dully as possible the design, manufacture and testing aspects of a *Part*. It should also include the part number history and information relating to failure investigations.

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