

Vehicle Standards Bulletin 6 Review

Have your say

In partnership with industry, the National Heavy Vehicle Regulator (NHVR) is reviewing the *Vehicle Standards Bulletin (VSB) 6: National Code of Practice for Heavy Vehicle Modifications* and invites your comment on the proposed changes.

From Monday 6 February until Friday 17 March 2017, a public consultation draft of the revised VSB6 is available for review.

Submissions may be published on the NHVR's website or circulated to the VSB6 working group. If you don't want your personal information to be included with a published submission, please indicate this clearly in your submission.

For more information about the VSB6 review, including an overview of the proposed changes, visit the NHVRs website at www.nhvr.gov.au/vsb6

- This form must be used when submitting feedback on the public consultation draft. Please do not modify or change this form, including its table headings, columns or structure.
- Clearly outline the issue being raised and provide a proposed change for consideration. Please ensure all fields have been completed for each item. The example below is for information only.
- Completed feedback forms must be submitted to the NHVR before 11:59pm on Friday, 17 March 2017.
- Email your completed feedback form to VSB6SIWG@nhvr.gov.au

How to make your submission

Your details

Name:	Darryl Ramm			Organisation:	Gas Energy Australia	
Location:	Suite 7, 16 National Circuit Barton ACT 2600			Position*:	Manager Technical Developmengt	
Phone number:	02 6176 3105			Email address:	dramm@gasenergyaustralia.asn.au	
Are you a:	<input type="checkbox"/> Approved vehicle examiner	<input type="checkbox"/> Vehicle manufacturer	<input type="checkbox"/> Component manufacturer	<input type="checkbox"/> Component supplier	<input checked="" type="checkbox"/> Industry association	<input type="checkbox"/> Other: _____

*For an organisation, the person nominated must be the relevant officer who can provide any additional information, if required.

Submission

VSB6 section	Section clause	Page no.	Comment detail	Proposed change
<p>Example G – Brakes.</p>	<p>Example 5. Design Requirements; Anti-lock braking system electricals;</p>	<p>Example 4</p>	<p>Example The ‘current carrying’ capacity listed in the table for ‘Pin no. 3’ is incorrect as it does not align with ADR35/.. .</p>	<p>Example Update the current for pin no 3 to 2A to align with ADR35/.. .</p>
<p>A - Engines</p>	<p>Section 6. Required</p>	<p>5</p>	<p>EXTRACT - “If diesel engines are converted to operate on an alternative fuel other than LPG in a single fuel, multi-simultaneous fuels or dual fuel mode, test the completed vehicle to the requirements of DT80 Emission Rates as required by the relevant heavy vehicle standards regulation. “</p> <p>GEA suggests that this section is confusing - Natural Gas (NG) is covered by testing in accordance with AS/NZS 2739.</p> <p>DT80 tests outlined in the LPG and NG standards (AS/NZS 1425 and AS/NZS 2739) apply only to ADR 70/00 (or equivalent) vehicles and earlier.</p> <p>Testing for other alternate fuels should follow a similar process to that outlined in the gaseous fuels standards and be approved by relevant State or Territory regulators.</p>	<p>Suggest the following text:</p> <p>“If diesel engines are converted to operate on an alternative fuel other than LPG or NG which are covered by AS/NZS 1425 and AS/NZS 2739 respectively in a single fuel, multi-simultaneous fuels or dual fuel mode, test the completed vehicle to the requirements of DT80 Emission Rates only to ADR 70/00 (or equivalent) vehicles and earlier as required by the relevant heavy vehicle standards regulation. “</p>
<p>A- Engines</p>	<p>Section 6: Required</p>	<p>5</p>	<p>The testing requirement is confused as the text refers to CNG, however the AS/NZS 2739 is a natural gas (NG) standard which included CNG and LNG. The terminology in the text should be amended to correspond with the referenced standard as a whole.</p>	<p>Recommend the term natural gas (NG) be used instead of CNG or LNG and the reference to AS/NZS 2739 remain.</p>

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			Current text - (Ensure that compressed natural gas (CNG) fuelled vehicles comply with the requirements of AS/NZS 2739 Natural Gas (NG) fuel systems for vehicle engines.)	Suggest the following text: “Ensure that natural gas (NG) fuelled vehicles comply with the requirements of AS/NZS 2739 Natural Gas (NG) fuel systems for vehicle engines”
			To ensure ongoing consistency, GEA recommends that the references to Australian Standards are maintained and kept current.	Australian Standard AS2739 is undergoing a review and the testing requirements are being revised with Industry proposing amendments to AS1425 to mirror the changes in AS2739. With this work underway it is imperative that the revised Australian Standard is adopted and not wait until VSB6 is reviewed in the future. GEA recommends VSB6 continue referencing the Australian Standard directly and not develop stand alone wording which will become outdated as the Standards are reviewed and published.
M- Fuel Systems	Whole of appendix	All	Appendix A is titled Modification Code A1 – Engine Substitution and includes a heading (page 5) - Fuel System requirements The requirement includes “Ensure that liquefied petroleum gas (LPG) fuelled vehicles comply with the requirements of ADR 44/.. and AS/NZS 1425 LP Gas fuel systems for vehicle engines” and as outlined above Ensure that natural gas (NG) fuelled vehicles comply with the requirements of AS/NZS 2739 Natural Gas (NG) fuel systems for vehicle engines. Contained within the Australian Standards are requirements for the	Recommend the description for Appendix M be amended to ensure there is no confusion. Suggest the following text: 1. Description This section of Vehicle Standards Bulletin 6 (VSB6) relates to the modification of fuel systems and the fitting of modified fuel systems to heavy vehicles. It does not include alternate fuel system requirements which are covered in Appendix A Engines – Section 6.

VSB6 section	Section clause	Page no.	Comment detail	Proposed change
			<p>detailed requirements for fuel systems for these alternate fuels.</p> <p>Section M is titled “Fuel Systems” and it is confusing with two similar headings being contained within the single document referring to “Fuel Systems”</p>	