

## **TWO-STAGE VEHICLE BUILDING ADR COMPLIANCE RESPONSIBILITIES**

### **PREVIOUS ARRANGEMENTS**

A Two Stage vehicle manufacturing system, comprising:-

Stage 1 – Chassis

Stage 2 – Body

*(This Two Stage system is still recognised and acknowledged by DoTARS)*

A two plate ADR Compliance Approval system

The Bus Chassis manufacturer was individually responsible for the ADR Approval of the chassis to applicable chassis ADR's, and the fitment of a "Red Plate" ADR Compliance Plate to the bus chassis.

The Bus Body Builder was individually responsible for ADR Approval of the body to applicable body related ADR's.

Each manufacturer (either chassis or body) was responsible for its own product .... Legal & warranty.

ADR's that applied as at the Date of Manufacture of the chassis and the body were an acceptable basis to enable road registration of the completed vehicle.

This gave an operator options in purchase of chassis in economic batches and hold them until a suitable time for introduction into body build, or otherwise the operator had the option of having vehicles built and held in storage until a suitable time to register and operate the vehicle.

The operator had the flexibility to introduce fleet updates in a manner that suited his planning and operations.

This also provided a benefit to the body builder by enabling longer term scheduling and planning of upcoming work.

### **CURRENT ARRANGEMENTS**

The Two Stage vehicle manufacturing system remains, however .....

The two plate ADR Compliance Approval system was dropped by FORS / DoTARS in circa 1999-2000, and took more than 5 years of industry negotiation with DoTARS to have the two plate system (with a related chassis Data Sheet) re-introduced. Before this system was "officially" adopted by DoTARS, body builders experienced great difficulty in obtaining precise chassis ADR Compliance Approval information ... as was found necessary in the Body Builder's new responsibilities in order to address the issues in the following paragraphs.

Note: Body Builders still experience problems with chassis information provided on the chassis Data Sheets)

FORS / DoTARS decreed that the Body Builder (being the ADR Compliance Plate holder for the completed vehicle) is responsible for the ADR Compliance of the entire vehicle. This includes the Bus Chassis (which DoTARS deemed is now a Sub-Assembly of the complete vehicle. This responsibility now requires the Body Builder to continually monitor and review chassis ADR approval status ... and to sort-out all chassis compliance concerns with the chassis manufacturer.

The body builder (typically) has no commercial interest, selection or control over the chassis manufacturer's product. Yet body builders have experienced situations whereby Body Builders have expressed concerns on chassis non-compliance issues to the chassis manufacturers, only to be disregarded.

It is ludicrous that Body Builders are placed in the position by DoTARS as being legally responsible for chassis compliance where it is outside of body builder control.

Recent chassis ADR changes have provided examples of how powerless the Body Builder is in cases where new and significant chassis ADR's are introduced, and where the chassis manufacturer is unable to supply new ADR compliant chassis to the market to meet the ADR timing.

The experience of the introduction of ADR 80/02 and 83/00 (chassis based ADR's) was beyond the control of the Body Builders .... Yet over the past 2 years it has been the Body Builders that have been caught up in the representations to Government, and incurring related commercial costs and difficulties, in seeking to find rational solutions.

The ADR's that apply to the Date of Manufacture of a chassis are no longer valid where the chassis ADR's are subsequently updated. When chassis ADR updates now occur, the chassis must either be upgraded or otherwise disposed of as it is no longer suitable for new vehicle construction.

The bus industry (and including bus operators) must now be certain that the bus chassis will in fact meet all current chassis ADR's at the time of completion of body build (when the vehicle is plated with its Date of Manufacture. The Bus Body Builder has this prime responsibility.