



SUBMISSION TO THE NATIONAL TRANSPORT COMMISSION

Australian Light Vehicle Standards Rules Amendment (Miscellaneous) 2026

March 2026

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The Motor Trades Association of Australia (MTAA) welcomes the opportunity to provide input on the proposed amendments to the Australian Light Vehicle Standards Rules.

MTAA represents the automotive retail, repair and service sector nationally, comprising predominantly small and medium-sized businesses operating across metropolitan, regional and remote Australia. These businesses play a critical role in maintaining the safety, compliance and roadworthiness of Australia's vehicle fleet.

MTAA supports the proposed amendments to the *Australian Light Vehicle Standards Rules Amendment (Miscellaneous) 2026*. The amendments are largely editorial and clarificatory in nature, addressing previous drafting ambiguities and improving the practical operation of alternative fuel vehicle labelling requirements.

MTAA considers the amendments necessary to ensure clearer interpretation of in-service requirements and to promote nationally consistent compliance outcomes for industry participants and the broader vehicle operators.

MTAA supports a clear and consistent regulatory framework for vehicle identification and compliance. It is critical, however, that responsibility for vehicle labelling remains appropriately allocated within existing frameworks. Vehicle labelling responsibility should continue to remain with the manufacturer or the certifying entity, including road authorities, given that these parties:

- > Have full visibility of the vehicle's original design, compliance pathway and applicable standards
- > Are best placed to ensure the accuracy and consistency of compliance labelling
- > Operate within established certification and approval frameworks

The proposed amendments should avoid any unintended shifting of compliance responsibility onto downstream participants in the automotive supply chain. In particular:

- > MTAA members should not be required to interpret or apply labelling rules beyond their operational scope, especially if subordinate instruments or guidance materials from road authorities are not clearly defined
- > compliance obligations should not be transferred through ambiguity in definitions or guidance
- > regulatory settings should reflect the practical roles and capabilities of each part of the industry

While MTAA supports the intent and content of the proposed amendments, it strongly emphasises the need for national consistency in the timing, adoption, and implementation of the ALVSR amendments by states and territories.

In practice, repairers, modifiers and licensed vehicle testers ultimately undertake work in accordance with state and territory-based in-service vehicle standards, rather than the model rules. Inconsistent adoption or delayed implementation across jurisdictions can result in:

- > Conflicting compliance expectations for industry participants
- > Increased administrative and training burdens for MTAA members operating across borders
- > Inconsistent inspection and enforcement outcomes
- > Confusion for vehicle owners and operators

MTAA recommends that the NTC encourages jurisdictions to adopt the amended ALVSR provisions in a coordinated and harmonised manner, align commencement timeframes wherever possible, and ensure subordinate instruments (such as Vehicle Standards Information, inspection manuals and guidance materials) are updated concurrently to reflect amended in-service requirements.

MTAA would welcome the opportunity to engage further with the NTC on the practical implementation of these amendments. Please contact us at info@mtaa.com.au if you wish to discuss further.

Contact

E info@mtaa.com.au

mtaa.com.au

