

20 December 2019
Our Reference: DOC19/62233

David Pisasale
Ezi-Products Pty. Ltd.
2 Rutherford Road
SEAFORD, VIC 3198

Dear Mr Pisasale,

Publishing of revised Vehicle Standards Guide (VSG18)

Further to our previous discussions concerning the fitment of low friction plates (LFPs) to heavy vehicles, the National Heavy Vehicle Regulator (NHVR) has reviewed its' guidance relating to these products. On 11 November 2019 a revised Vehicle Standard Guide (VSG18) regarding the use of low friction plates on fifth wheel couplings was published.

The revised guide details the requirements for demonstrating the continued compliance of modified fifth wheel couplings and outlines the NHVRs requirements for the assessment and certification of low friction plates (LFPs), including those supplied by Ezi-Products.

The NHVR has considered, and recognises, that the results from the non-destructive test (NDT) program, along with the two technical reports provided, are sufficient evidence for demonstrating continued compliance of these types of fifth wheel couplings that have been in-service tested. Specifically, continued compliance relates to LFPs designed for the following fifth wheels:

Fifth Wheel make/model	Approved Ezi-Products LFP
Holland FW350	EZIH350
Holland FW351	EZIH351
JSK 36	EZIJ36
JSK 37	EZIJ37
York Big D	YBD

As a manufacturer of third party LFP's, Ezi-Products must retain evidence of continued compliance on file and make it available to the NHVR or relevant heavy vehicle regulator when requested. The NHVR would expect this evidence, at a minimum, to include a copy of this letter, the results of the NDT tests and the two technical reports provided.

Additionally, you are required to publish to your website, and make available on request, a declaration of continued compliance for each of the LFP products identified above.

This declaration may be presented as a certificate of continued compliance and must include the following information:

- be published on the letterhead of the product supplier and clearly identify the person issuing the declaration and their position
- be issued for a single model of LFP that has been validated
- identify the make / model of fifth wheel/s the LFP has been assessed for
- the method of validation (i.e. by way of engineering assessment or physical testing)

- clear installation instructions for each LFP type and for each tow coupling to which their LFPs can be installed. The installation instructions must:
 - detail how to set up the drilling layout so that holes are correctly located
 - detail any special hole treatment that may be required
 - detail the correct bolting arrangement, including bolt tensions, lengths and specifications
 - provide a diagram of the drilling layout, including key dimensions that allow verification of the correct location of drilled holes
 - outline any safety precautions that may be relevant to ensure that tow coupling operation is not compromised
 - outline any quality and compatibility checks that may be required before installation or during the in-service life of the LFP
 - outline the method for assuring the locking jaw mechanism of the fifth wheel assembly continues to fully engage with a matching kingpin, as per Section 11.2 of AS/NZS 4968.2:2003
 - any requirements stated as a result of the validation of continued compliance.

It is recommended that the certificate also carry a statement that continued compliance is dependent on Ezi-Products' installation instructions being strictly followed and be supplied with each kit produced.

The NHVR recognises that the above list of approved LFPs does not represent the entire Ezi-Products range and that additional time is required to complete your assessment of the outstanding products. The NHVR is prepared to allow Ezi-Products an additional 6 month period to confirm continued compliance of the other LFP designs currently in the market. This means that by 10 May 2019, the full range of Ezi-Products must meet requirements of VSG 18.

Testing of the outstanding LFP designs may use the same method as for the approved LFPs, i.e. evidence of continued compliance by NDT, or by the method described in VSG18. The results of this testing or engineering assessment must be retained to support a claim of continued compliance and the required documents must be published on your website. Should you be unable to establish evidence of continued compliance for any of the outstanding LFPs within the designated time frame, contact the NHVR as early as possible to discuss.

It is important to note that while the NHVR approved method of NDT testing may be used on the outstanding Ezi-Products LFPs, the NHVR does not consider NDT to be a suitable test method for establishing continued compliance for new LFP designs.

I trust this information addressed the matter you raised. Should you require any further information, please contact Robert Gibson, Principal Engineer (Vehicle Safety and Performance) on 07 3309 8552 or email at robert.gibson@nhvr.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Austin'.

Peter Austin
Manager (Safety Standards & Performance)

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VSG18 - Low friction plates on fifth wheels and skid plates