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Allan RTA/RMS Licensed VSCCS Certifier 120001.

To Cassie MacKender
Kenda Park.
4985 Great Western Highway.
Glanmire. NSW. 2795.

Dear Cassie.

This is the VSCCS Assessment of your Shadow Stock Trailer, Vin number 1S9BS1829FW873970, Number plate fitted H17141. Manufactured date 11/2014.

This trailer as manufactured was rated and imported as a 4498kg ATM trailer, and has been registered in Australia as a 3500kg ATM trailer without any modification certification. The trailer is registered as a Category TA trailer, when in fact as a Trailer manufactured to exceed 3500kg ATM the vehicle is in fact a TC Category trailer unless it is a certified modified trailer. This is from the USA Vin placard fitted.

This trailer being a new registration Up to the time of first registration was under the control of DOTARS and could not be legally modified other than under a second stage of manufacture to reduce it to a 3500kg ATM trailer. It would otherwise have had to be registered as a 4498kg ATM and then modified and certified under NSW RMS to reduce the ATM/GTM to 3500kg ATM and a GTM of some 3150kg. At the same time the category would have been changed to a TA trailer.

In short all new motor vehicles in Australia up until they are first registered are under the control of the Federal Government DOTARS. These can only be modified as in trucks and commercial vehicles as Cab Chassis and have modifications carried out. No other new motor vehicle can be modified other than by another process called a second stage of manufacture, whereby the modifier calls it a different vehicle and with a type approval from DOTARS and fits a new appropriate vin plate. Other than this the process is to register it as the vin plate states under one of the Various states rules as per RMS, then carry out a modification which must be modified and certified by a VSCCS certifier if in NSW. In Short New vehicles until registered are under DOTARS, Registered vehicles up to and including 4500 KG ATM/GVM are under the States jurisdiction, Vehicles in all the Eastern states 4501kg and above are under the jurisdiction of The National Heavy Vehicle Regulator although managed by the state jurisdictions as in RMS etc.

The safety chains are incorrectly fitted for a 3500kg ATM trailer, Reference VSB1, these require a different mounting system and are not welded to the drawbar. ADR reference is ADR42 [safety].

The front reflectors are mounted at an angle to the Approaching traffic, this is incorrect as reflectors are all required to be square on to the light emitted at them otherwise they do not work. ADR reference ADR13 ADR42 [lighting, safety].

The rear number plate light is fitted forwards of the number plate and sends light behind the number plate, also only one light is fitted VSB1 requires 1 light above the number plate or 1 fitted at each end of the number plate, this trailer is fitted with only 1 on the right hand side of the plate. This is an ADR 13 requirement.

The above are clearly items that should have been addressed at or prior to the original registration and are clearly not compliant with DOTARs or RMS requirements.

The axle position on this trailer creates a dangerous situation in that it overloads the trailer coupling, Drawbar and tow bar on the towing vehicle, This vehicle is described as a Rigid Drawbar Pig trailer due to having a fixed drawbar to chassis, The loading area of the trailer is some 4860mm long, with a suspension mounted at a center of some 1630mm from the rear, this gives a balanced rear axle loading of some 67% of applied load at a water level load, the other 33% is distributed over the rear axle and the coupling point. This applies an extra 293kg on the coupling as a 3500kg ATM trailer

or an extra 506kg on the coupling if it was registered as a 4498kg ATM, only in this case we are looking at the 3500kg unit. In real terms the Axle positions need to move forward in the order of some 400mm. which would be finalized by the trailer builder or modifier.

The trailer has been reweighed on a registered public weighbridge for this exercise with a Tare weight of 1720kg and a Drawbar coupling weight, of 260kg un laden. This may look alright, however this as a un laden 1720kg tare weight should only have about 150kg on the coupling, a loaded trailer grossing 3500kg ATM should only weigh 350kg on the drawbar and in fact this trailer will weigh in the order of 553kg or 63 % overloaded. There is a massive design error in the positioning of this vehicles suspension which due to design is a very difficult unit to successfully modify and be happy with the outcome.

This trailer coming under the RMS for registration, should have gone through a Blue slip, which incorporates a design check. This should have picked up the areas addressed above and maybe more, as I have only looked at the areas that are clearly visible and relevant to the problem. The problem is clearly a manufacturer and importer come problem and they should take responsibility for it.

There are clearly numerous areas of fault on this unit however the end always comes back in this case to the importer and sales in Australia. It is a part of the law that a unit must be fit for purpose and capable of carrying out the job in a safe manner. It would not matter if this unit was towed behind a Land Cruiser, Ford F250, Ford Ranger, D Max, or any other 3500KG ATM certified tow vehicles the 350kg vertical load applies.

The water level loading applies to this unit as a stock trailer [say sheep] with a nominally a center cross divider fitted to maintain load stability as a similar mass loading, if as the unit can be configured to carry larger animals greater care would need to be exercised with loading

Abbreviations used are, VSCCS Vehicle safety compliance certificate scheme, ADR Australian design rules, ATM Aggregate trailer Mass, GVM gross vehicle Mass, GTM gross trailer mass, VIN Vehicle identification number, VSB vehicle Standards bulletin, RMS roads and maritime services, DOTARS department of transport and regional services,

Attachments included are a copy of my CV up to approximately June 2011, also included is a copy of my current VSCCS license.

Yours Faithfully

Allan J Goodacre

Licensed VSCCS Certifier number 120001