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ARTICLE · APPROVAL HOLDERS · 4 MIN READ

Whose Name Is on Your Vehicle Approval?

An employee can manage the application. That does not mean the approval should belong to them.

The trailers carry your brand. Your company pays the invoices. Someone in the office handles the application.

When the approval arrives, everyone gets back to business.

But who is actually named as the approval holder?

For trailer manufacturers and importers, that question deserves attention before an application is submitted—and before a key employee leaves.



Who holds the approval and who manages it are separate questions. Concept illustration only; not an actual client case.

The person using ROVER and the approval holder are different roles

An employee or consultant can use ROVER to act for an applicant with the appropriate authority to act. Their involvement does not make them the holder of the resulting Vehicle Type Approval. Department guidance, page 11

Equally, using a company email address does not settle who the applicant is.

Individuals can legitimately hold approvals. The issue is whether the chosen holder matches the intended business arrangements—not whether an individual's name appears anywhere in the process.

What happens when the employee leaves?

Consider a company that discovers its approval was granted to an employee personally, rather than to the company they worked for.

The employee resigns. The company still has orders, stock and customers expecting delivery.

In everyday terms, the employee has “taken the approval with them”. More precisely, the approval remains in that individual’s name. A staff handover does not make the company its holder.

This is more than changing a password or updating a contact. The Department states that approvals cannot be transferred to an alternative approval holder through the variation process. Department guidance, page 4

The business may need a new approval or another properly assessed arrangement before continuing the activities it intended to undertake. That can put supply plans and customer commitments under pressure.

By contrast, where the company holds the approval and the departing employee merely manages it, the focus is an orderly handover of authority, access, records and responsibilities.

The individual may be accepting more than an office task

Being named as the holder brings approval-holder obligations. These include meeting the applicable conditions of approval, maintaining supporting records and responding to relevant regulatory requirements. Road Vehicle Standards Rules, sections 25–30

For an individual, this can mean personal exposure to enforcement consequences if those obligations are breached. “I was only doing this for my employer” is not a safe basis for choosing to hold an approval personally. Road Vehicle Standards Act, section 28

Safety issues and recalls also need attention. Recall-related responsibilities may arise under approval conditions and the person’s role in the supply chain. Department guidance, pages 40–42

Leaving employment does not, by itself, change the named holder or resolve those responsibilities. Nor does naming an individual mean the business has escaped its own obligations. Responsibility for a particular recall, including its costs, depends on the circumstances.

Check the arrangement before it becomes a problem

Three questions are worth asking:

• Who is named on the actual approval notice?

• Does that match the entity intended to hold the approval and the supporting business arrangements?

• If the person managing the approval left tomorrow, could the business maintain the necessary authority, records and control?

If the answers are unclear, resolve them before the next application, staff departure or business change.

Let ROVER Pro help establish the right position

ROVER Pro can review the proposed applicant or existing approval, identify mismatches and help establish the appropriate arrangements. Where a change needs regulatory engagement or separate legal advice, we can help identify and coordinate the next steps.

Before putting a name on an application—or relying on an existing approval—let us help you establish who should hold it and what that means.

Discuss your approval arrangements with ROVER Pro.

General information focused on vehicle type approvals. The appropriate holder, continuing authority, obligations and any corrective pathway depend on the actual approval, legal entities and circumstances. This Article does not determine liability in an individual case.