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PRODUCT ASSESSMENT IN TERMS OF THE NCAC ACT 41 OF 2002: VARIOUS VEHICLES AND COMPONENTS

1. Reva ICP (PTY) Ltd letter dated 13 October 2016 and onsite assessment on 12 October 2016 have reference.

2. Reva ICP (PTY) Ltd approached DCAC with respect to the control status of specific vehicles and components manufactured or utilised by the company. Herewith the response based on the recently performed assessment.

3. Reva armoured vehicles with ballistic protection of 6mm (or less) are sub-standard to the WA-List ML 6 and specifically the Level B6 / III ballistic protection. These vehicles should therefore not be controlled. These are:

a. Reva Security.

b. Reva Protection.

c. Reva III Standard.

d. Reva SUV.

4. Some Reva vehicles do have only 6mm ballistic protection but are controlled due to the control status of added fixtures as discussed above. These vehicles are:

a. Reva III.

b. Reva Fast Attack Vehicle.

c. Reva Scout.

5. Fitment of Uncontrolled Components vs Military off the Shelf Components. A vehicle with lower than Level B6 / II ballistic protection can require control due to fixtures added to such a vehicle as listed above. The fitment of Commercial off the shelf (COTS) items to the vehicle does not influence the control status of the assembly but vice versa ("parent pollutes the child") is possible. This reiterates the fact that no control of the COTS-items will be required. However, if military or "Military off the Shelf" (MOTS) items are added to the installation the situation changes (see Figure 1 below).

Figure 1: The Influence of Uncontrolled Items, COTS and MOTS Components

Figure 1.1

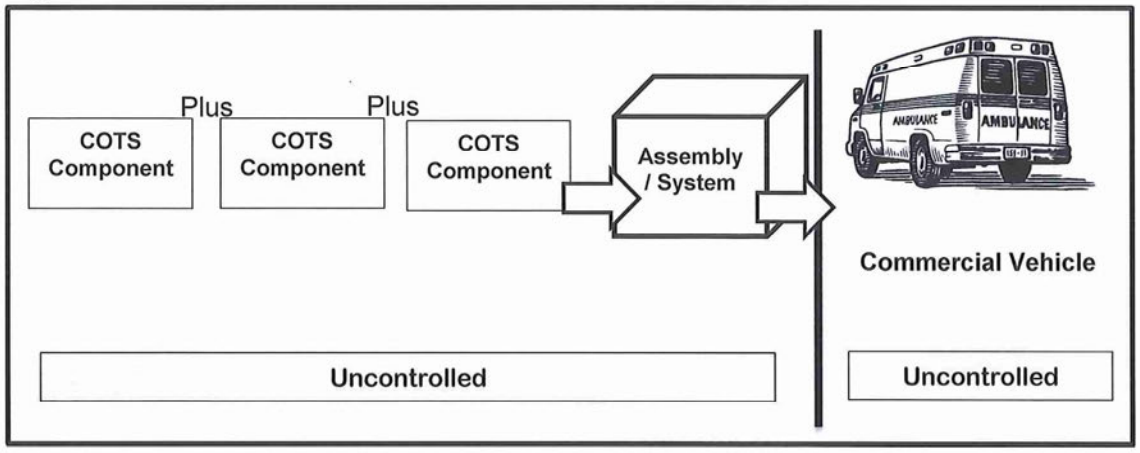


Figure 1.2

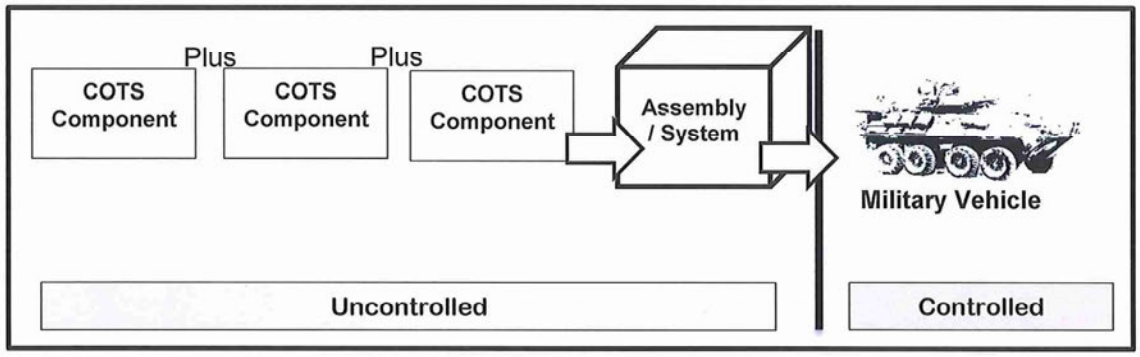


Figure 1.3

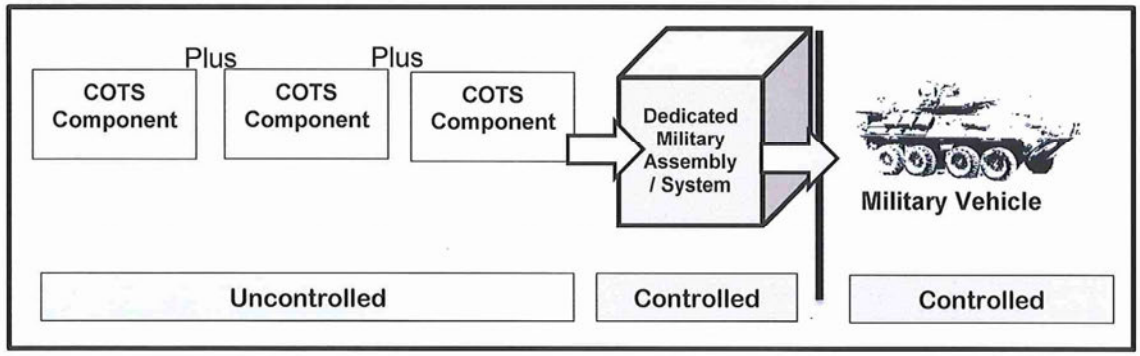


Figure 1.4

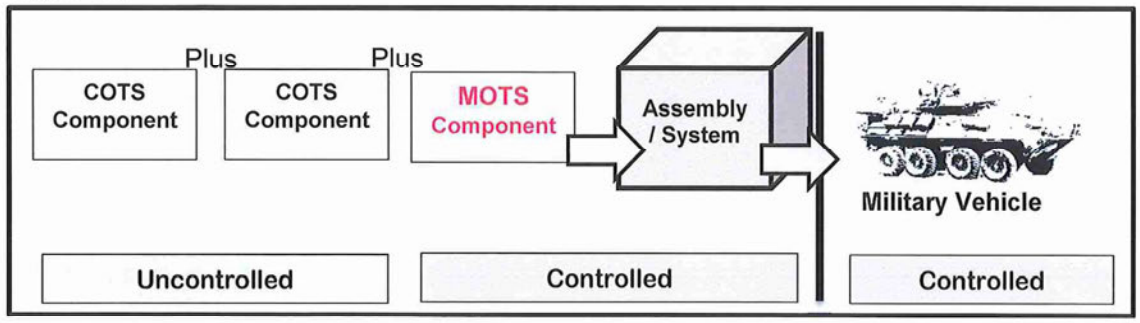
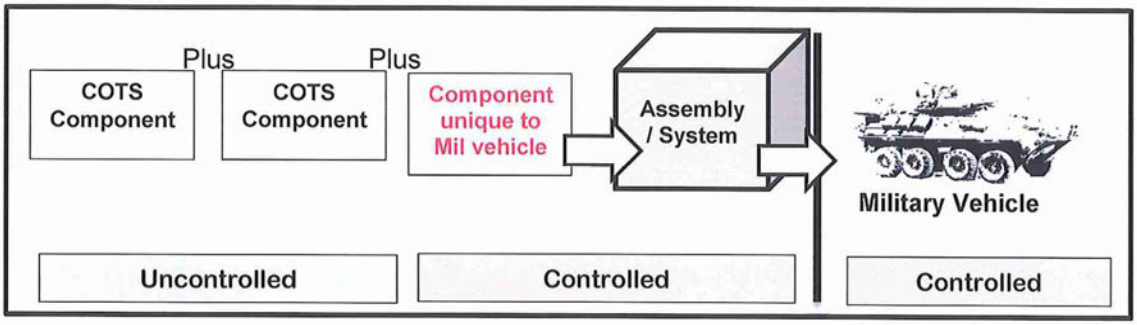


Figure 1.5



6. Figure 1.1 denotes a condition where the COTS components, parts and assemblies are commercial in nature. These can be fitted to any vehicle and fitment can even be tailor made to fit the particular vehicle. Figure 1.2 denotes a condition where all COTS components, parts and assemblies are commercial in nature but can be fitted to a military vehicle although fitment might be tailor made to fit the particular military vehicle. But when the total assembly/system is unique to a military vehicle (Figure 1.3), the COTS-item is controlled/dual use under the WA List 2010 and Regulation 321. The standard/commercial item unfitted to a military vehicle is not controlled or dual use but fitted to the vehicle it is controlled (parent pollutes child).

7. Figure 1.4 denotes a situation where a MOTS component is premeditated added to the assembly and the change in control status. Figure 1.5 depicts a situation where a specifically military designed component (in other words, military custom made and not off the shelf available) is added to adhere to a specific military specification. This specific component(s) (if not insignificant) and the assembly, will be controlled.

8. It was found during the onsite assessment that the components as listed in Table 2 are controlled in terms of the WA-list 2010. The rest of the items (not shown in Table 2) are COTS items and are not controlled.

Table 2: Reva III Items / Components that must be controlled in terms of WA 2010

	REVA III MUNITIONS LIST APC ITEM CONTROL LIST			
Colour Key				
1. Red	1-No; 2-Yes; 9-No	ML6.a & b		
2. Brown	1-No; 2-No; 3-Yes; 9-No	ML6.a & b		
3. Orange	1-No; 2-No; 3-No; 4-No; 5-No; 6-Yes; 9-No	MOTS		
4. Purple	1-No; 2-No; 3-No; 4-No; 5-No; 6-No; 7-No	Uncontrolled		
5. Green	1-Yes	COTS		
6. Yellow	1-No; 2-No; 3-Yes; 9-Yes	Uncontrolled Item		
PART NUMBER	**DESCRIPTION**	**DESTINATION ON VIHICLE**	**CLASSIFICATION**	**WASSENAAR 2010 CONTROL LIST NR**
3000-100038-06	TRANSMISSION, AUTOMATIC, ALLISON, 2500SP	POWER TRAIN	MOTS	ML6.a & b
3000-108019-06	RUN FLAT INSERT 20"	SUSPENSION	Munitions List Item	ML6.a & b Note 2a
2322-002168-12	HULL - WELDED ASSY	BODY / HULL	Munitions List Item	ML6.a & b (2 x 6mm)
2300-000034-01	WINDOW WINDSHIELD ASSY	WINDOWS	Munitions List Item	ML6.a & b
2300-000037-01	WINDOW FRONT RH ASSY	WINDOWS	Munitions List Item	ML6.a & b
2300-000048-01	WINDOW FRONT LH ASSY	WINDOWS	Munitions List Item	ML6.a & b
2300-000035-01	WINDOW SIDE ASSY	WINDOWS	Munitions List Item	ML6.a & b
2300-000086-01	WINDOW REAR DOOR ASSY	WINDOWS	Munitions List Item	ML6.a & b
2312-000108-01	REAR DOOR EXTRAS ASSY	EXTERIOR COMPONENTS	Munitions List Item	ML6.a & b (2 x 6mm)
3000-119010-01	WEAPONS MOUNT WITH PROTECTIVE PLATES	EXTERIOR COMPONENTS	Munitions List Item	ML6.a & b
3000-112098-06	Reva III 715 RHD A/T (GRP Populated Dashboard)	ELECTRICAL EQUIPMENT	Munitions List Item	ML6.a & b
3700-113079-06	LAMP 12V 2W (BLACKOUT LAMP REAR)	ELECTRICAL EQUIPMENT	Munitions List Item	ML6.a & b Note 2d
3000-050115-06	SWITCH, CONVOY LIGHT	ELECTRICAL EQUIPMENT	Munitions List Item	ML6.a & b Note 2d
2323-002518-01	GEARBOX PROTECTION PLATE WASSY	MINE BLAST PROTECTION	Munitions List Item	ML6.a & b (1 x 16mm)

9. Normal export restrictions will apply in terms of the WA-List 2010 but related to the local marketing and selling of vehicles matching or exceeding Level B6 / III ballistic protection, the following have to be ensured if the client is a non-statutory organisation:

a. The manufacturer/supplier must declare the prospective selling of the armoured vehicle to the intended institution to DCAC prior to any firm commitments.

b. The prospective buyer must apply for a licence / permit to possess and utilise the armoured vehicle as intended, with DCAC. (The manufacturer/supplier may facilitate this process as part of the service provided to the buyer.)

c. DCAC will consider the application in terms of the conventional arms control governance and related processes. DCAC will, amongst other, consider including "Statement of Commitment", "Purpose" (utilisation) and "Location" as elements to be evaluated and / or have to be declared by the prospective owner. DCAC will subsequently perform periodic onsite inspections at the non-statutory organisations utilising armoured vehicles matching Level B6 / III ballistic or higher protection.

10. It is recommended that Reva ICP provides its full cooperation to ensure that adequate control over the relevant vehicles is maintained.

(M.E. JELE)
DIRECTORATE CONVENTIONAL ARMS CONTROL: DIRECTOR

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