

To Whom It May Concern,

As a RAW Workshop, we were subjected to inspections and restrictions from Dept of Transport in regards to the vehicles that we are allowed to import and comply.

We would like to forward these proposals:

- When a RAWS Workshop achieve compliance on a particular model vehicle and also put in the application for a Low-Volume New Vehicle (LVNV) application for the same make and model of the vehicle, **concessions or exemptions for inspections** could be granted as the vehicle in question would have undergo identical conversion procedures and compliance process, with some variations.

As it is actually harder to achieve RAWS Compliance comparing to the LVNV compliance, due to the conditions applied in the RAWS system. The concession could be justified as the RAWS would have already understood and well aware of the stringent compliance conditions of which these vehicle are required to meet.

Therefore, with this in mind, the Dept. could grant compliance to the RAWS workshop with perhaps some conditions like submission of ADR evidence for review, etc. This will allow the Dept. to allocate resources and manpower to areas that requires them the most.

- In light of certain vehicles that does not quite fit into the USED IMPORT PLATE nor PERSONAL IMPORT PLATE, may we propose to introduce a plate system called **SPECIAL CONDITION IMPORT PLATE**. The plate could be conditional with the special consideration from the Administrator under the subsection of 16(2) of the MVS Act 1989.

This is suggested as state registration would prefer to view a plate on the vehicle prior to registering it in addition to just a certificate/letter of approval from the Dept. The plate could be also generate additional revenue for the Dept.

- Using the unrestricted motorcycle scheme in mind, would the Dept. consider a similar scheme for **unrestricted vehicles scheme**. We understand that this means the vehicle would be subjected to Full Volume Compliance and we are prepared to undertake the compliance process if the volume is unlimited.
- With that said, we propose that instead of having volume restrictions based on vehicle category, we would like to suggest that the **volume restrictions be expanded to vehicle make & models instead**. Eg, from 100 units of MA class vehicle to 100 units of Chev Camaro; 100 units of Mitsubishi Lancer..etc. Even if the volume is reduced to 80 vehicles per vehicle model.

Regards,

Jason Chan  
Automotive Compliance Officer

Victorian American Imports Pty Ltd  
5-11 Standing Drive  
Traralgon VIC 3844

Web: [www.victorianamericanimports.com](http://www.victorianamericanimports.com)

P: 03-5176 0600 F: 03-5174 0400

