

Department of Infrastructure and Transport

MVSAreview@infrastructure.gov.au

Re: Public consultation process on the Motor Vehicle Standards Act 1989 (the Act) and its Regulations

The purpose for the regulations is *to improve the safety, environmental performance and security of road vehicles in Australia.*

This is not being achieved effectively by the current application of the regulations which restricts the import of vehicles that would better meet these criteria.

Suggested Amendments

We need a nationally uniform system that is clear and fair, giving Australians access to the best possible vehicles from around the world at the lowest prices. The newest, safest and most efficient vehicles should be encouraged and restrictions to competition removed.

- Create an **Imported Vehicle Scheme (IVS)** based on the SEVS framework
- RAWs to continue under the same general guidelines
- Make it easier and less expensive for RAWs to add new models to their schedule
- Move towards adopting uniform UNECE international standards rather than separate ADR's
- Accept alternative emissions evidence to avoid expensive testing arrangements
- Allow OEM catalytic convertors and charcoal canisters to be retained, unless faulty
- Allow HID headlights (conversion reduces quality / safety)
- Allow the import of any vehicle younger than 10 years, up to 500 vehicles per RAW per year. Quota to be reviewed and increased annually for gradual phase-in.
- Retain existing rules and quotas for specialist and enthusiast vehicles to meet niche demand
- Allow the import of enthusiast, classic or historic vehicles over 25 years old. Compliance by RAWs to ensure quality, safety and emissions standards. 100 vehicle quota per RAW per year. Vehicles with safety and emissions enhancements (e.g. brakes, suspension, steering, newer engines etc.) to be allowed.

These simple amendments would achieve the aim of the Act and Regulations, save lives, and benefit the environment. Many new businesses would also be created, resulting in a more innovative industry and thousands of new and sustainable jobs across Australia.

The global cost of vehicles is a fundamental consideration.

Australia has one of the most aging vehicle fleets of any developed nation. This is a direct result of limited competition and choice, which keeps prices high and consumer options low.

Competition drives down second-hand vehicle prices and makes better cars more affordable.

Better vehicles could be imported from other countries for significantly lower prices.

Access to lower cost, newer, safer, more efficient, and more secure vehicles would remove inferior vehicles from Australian roads.

Newer and safer vehicles mean fewer accidents, injuries and fatalities on our roads, and less impact on the environment through lower emissions and reduced fuel use.

First car buyers aged between 17 to 25 years often have a limited budget and can only afford vehicles that are 15 to 30 years old. Drivers in this age group are most at risk of accidents involving death or serious injury, and would benefit most from access to better vehicles.

If these drivers could instead afford a 6 to 10 year old vehicle, this alone would result in an immediate and measurable improvement in road safety as well as saving many young lives and the associated trauma to their family and the significant cost to society as a whole.

Road deaths have decreased in the 24 years since the introduction of the Act. However, much of this could be attributed to significant improvements in vehicle safety in that time including airbags and ABS brakes. Serious injury crashes have not decreased in real terms during the same period.

Considerable improvements would be possible with access to safer and cheaper vehicles.

Amendments should be made to progressively remove the restrictions on imported secondhand vehicles while still maintaining the quality of vehicles imported through a monitored scheme.

With the closure of manufacturing plants in Australia, the perceived need for protection of local jobs is more ill-founded than ever.

The current application of the rules appears to protect the interests of a handful of large international car manufacturers. This is not in the best interests of Australians, local business, road safety, or the environment.

There is always resistance to change however the many possibilities and benefits should be recognised and taken into account with this review. This is a tremendous opportunity to make a real difference to road safety and the impact of Australian vehicles on the environment.

Yours Sincerely,

Sailesh Mukundala

17th June 2013