

## **Department of Infrastructure and Transport**

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### **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.*

Government policy is to create competition in achieving the above.

The above objectives are not being achieved effectively by the current practise of the regulations. The current regulations restrict the import of vehicles that would otherwise better meet the above criteria and satisfy government policy.

### **Suggested Changes to the Regulations**

A nationally uniform system that is clear and fair, giving Australians access to the best possible vehicles from around the world at the most competitive prices would be a worthwhile mechanism for adoption.

The newest, safest and most efficient vehicles should be encouraged to be imported without restriction and competition in the market place increased.

The following points summarise the changes proposed;

- 1) Allow variants of models sold in Australia in full volume to be eligible through RAWs if they meet the SEVS criteria.

The above to also allow import of hybrid and low-emissions variants of full volume vehicles not being sold in Australia to satisfy the Commonwealth government criteria and commitment to the environment. Allowing eligibility for all hybrid or low emissions vehicles, irrespective of whether or not the 'standard' variant is already sold in Australia in full volume, would go a long way to achieving this goal.

- 2) Create a Used Import Scheme for vehicles under 10 years old.

This proposal replicates a similar setup to New Zealand where a conscious effort has been made to reduce the average age of the vehicle fleet. Eligible vehicles would be any models not sold in Australia in full volume (allowing the manufacturers the standard 18 month window to bring the model in themselves first) and would be complied by current RAWs. By limiting the number of RAWs and the number of vehicles they can comply, numbers should remain capped. It would still need to operate in conjunction with SEVS depending on the mix of schemes available, so the maximum numbers for the two schemes would need to be reconsidered.

- 3) Create a 15 year rule and a 30 year rule. Rather than basing the classic car rule around a cut-off date, revert to basing it on the age of the vehicle, but in a graduated manner.

At 15 years of age, any vehicle becomes eligible, but it must first meet one of the four current SEVS criteria (and must be applied for, and approved before importing) and

must be complied by a RAW before it can be registered using criteria applied to individual vehicles rather than the sample vehicle process used for RAWs.

Once the vehicle reaches 30 years of age, all vehicles then become eligible, as is currently the case for vehicles built prior to 1989, but they must also use a RAW to comply them. Like the above idea, this allows for RAWs to be used more widely than they currently are. This would operate in conjunction with the current RAWs.

Vehicles with safety and emissions enhancements (e.g. brakes, suspension, steering, newer engines etc.) to be allowed.

- 4) Create an amended Scheme for importation based on the SEVS framework
- 5) RAWs to continue under the same general guidelines as this seems to be working adequately
- 6) Make it easier and less expensive for RAWs to add new models to their schedule
- 7) Move towards adopting uniform UN international standards rather than ADR's noting that approximately 90% of ADR's are aligned with UN standards currently
- 8) Accept alternative emissions evidence to avoid expensive testing arrangements
- 9) Allow OEM catalytic convertors, charcoal canisters and the like to be retained, unless proven to be faulty. Testing during compliance could verify the condition.
- 10) Allow factory HID headlights to be retained (conversion often reduces quality / safety)
- 11) Allow tyres to be retained on vehicle (as imported and fitted to the car) if International Standards and local roadworthy standards for the tyres are met. Standards to be agreed. This will also negate the requirement to fit new tyres to vehicles imported if tyres are already very good, reducing importation cost and providing environmental benefits as tyres are not required to be recycled and full useful tyre life can be achieved
- 12) The requirement for LHD vehicles to be converted to RHD to be waived where safety, crash testing, emissions etc requirements have been deemed to be met in a referenced and agreed UN standard. Allow the importation of alternative fuel vehicles such as electric, hybrid, LPG etc.

For cars eligible to be imported under item 3 above, i.e vehicles older than 15 years old, LHD factory assembled and engineered cars to remain as is. There is an element of conversion and modification which can be attributed to appreciable additional cost and possible reduction in safety if modified.

- 13) The recording of odometer readings of vehicles as they are imported into the country to be introduced to stop tampering of odometers by individuals and companies prior to first registration in Australia. De-registration papers from the country of importation to be submitted by the RAWs workshop when approval for import to Australia is sought. A national database to be created with state roads' authorities to be responsible for keeping such records cross referencing VIN's, engine numbers, etc and accessible to first car buyers in Australia. This will

ensure used vehicles are sold into Australia on an equal basis, therefore improving the general condition and safety of vehicles on the road, whilst improving competition and reducing the cost of used vehicles.

The above amendments would achieve the aim of the Act and Regulations, save lives, and benefit the environment. Many new businesses would also be created, with specialist servicing, spare parts and warranty business opportunities 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 vehicle manufacturing plants in Australia (eg. Nissan, Mitsubishi and more recently Ford), the shift is inevitable from manufacturing in Australia to R&D, and Engineering/development for the car industry in Australia. This assumes that Australian companies (or branches operating in Australia but foreign owned), want to be involved and contribute to the global car industry.

The importation of all cars in Australia is an inevitable reality where the final product is safer, to a better quality, environmentally more friendly and more cost effective to the market.

The many Billions of tax payers dollars the government has provided to prop up the Australian car manufacturing industry to date, and proposed to be provided in the future, would be better utilised elsewhere such as healthcare, education, roads and transport infrastructure, crime prevention etc, etc, to make for a better society in Australia for all.

The current application of the rules appears to protect the interests of a handful of large international car manufacturers, who's products in the marketplace no longer cater for the demand of most of the Australian public. This is not in the best interests of Australians, local business, road safety, the environment or our economy.

These changes are a tremendous opportunity to make a real difference to road safety, the environment and competitiveness in vehicle availability.

Yours Sincerely

An Opinionated Car Enthusiast.

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