

20 June 2013

Dear MVSA Review Team,

Performax International would like to express an overall satisfaction with the MVSA to date. We believe the Act is well balanced for all stakeholders. The items for review we nominate are outlined below;

1. Registered Automotive Workshop Scheme;
  - a) Under Motor Vehicle Standards (Approval to Place Used Import Plates) Guidelines 2006 (No. 1) all tyres fitted to the vehicle at the time of importation must be replaced with new tyres. It is common for Performax International to purchase very low mileage vehicles, and as such the tyres fitted to the vehicles are usually in excellent condition consistent with the age and use of the vehicle. The environmental impact of discarding and replacing 4 tyres per vehicle is significant. Is there provision to amend the MVSA to accept the condition of the tyre based on conformance to state legislation requirements in order to deem a tyre road worthy? This will reduce costs to RAWs and reduce the carbon foot print of the industry.
  - b) Catalytic converters are designed to have an extended service life generally encompassing the life of the vehicle. Motor Vehicle Standards (Approval to Place Used Import Plates) Guidelines 2006 (No. 1), RAWs are required to replace the catalytic converter when the vehicle is more than 5 years old or has had 80,000km of use. We would recommend a review of these parameters to extend to 10 years and 160,000km to reduce the cost and environmental impacts of replacing a device that relies on the use of precious metals in its construction.

Kind Regards,

Peter Lambrides  
Engineering Manager  
Performax International