

Shortcomings of the MVSA and its regulations

The Specialist Enthusiast Vehicle Scheme has not achieved the policy objective of providing consumers with “Specialist Enthusiast Vehicles”. The number (11,605) of pre-1989 vehicles imported in 2011-12 exceeded the number (9,690) of RAWs/SEVS vehicles imported.

Of the RAWs/SEVS vehicles that were imported a large proportion are “campervans” which are clearly NOT Specialist Enthusiast vehicles.

SEVS criteria established in 2001 are dated and no longer relevant:

1. The criteria for determining SEVS edibility are out dated and no longer relevant. The power to weight greater 105 kw/tonne (<9.5kg/kW) is easily met by many sedans today which are not specialist enthusiast vehicles.
2. Featured, in the “as manufactured” condition in motoring publications for specialist and enthusiast vehicles. Many ‘publications’ have now moved away from traditional print media and are featured on-line only. This is another example of the SEVS being outdated and needing review.

Changing market trends indicate the MVSA requires review

Changing trends in the market evidenced through the rise in the number of new imported vehicle and the decline in the numbers of locally manufactured vehicles indicates the current object 3(a) of the Act of achieving the policy objective of providing consumers with choice in used imported vehicles is no longer still valid and should be reviewed.

ADRs no longer relevant

Harmonisation with UNECE standards makes the current ADRs largely irrelevant. Abolishing the ADRs and using UNECE standards and will ease the burden of testing and proving compliance with ADRs while at the same time not undermining the policy objectives of road safety and security. There is currently no evidence to suggest that ADRs achieve a superior out coming in terms of achieving the policy objectives of road safety and security over UNECE standards. As such used imported vehicles which meet UNECE standards should be accepted as meeting appropriate standards for road registration in Australia. This is a non-regulatory way of achieving the same policy objectives of road safety, environment, security and consumer choice.

Proposed amendments

We propose the following changes to the concessional schemes to as to provide consumers with a broader range of vehicles without compromising road safety, environment and security:

1. Given the global environment for the automotive industry - removal of the SEVS and replacement with a **Used Vehicle Import Scheme** whereby if a vehicle is not currently imported in full volume it is eligible to be imported as a used vehicle
2. RAWs to be retained and ADRs to be replaced with UNECE standards
3. The current requirement under the determination *Motor Vehicle Standards (Approval to Place Used Import Plates) Guidelines 2006 (No. 1)* for ADRs 37, 79 and 80 to change catalytic converters on vehicles older than 5 years or having travelled more than 80,000klms be removed.

In many instances high quality OEM catalytic converters designed to be effective for the **life of the vehicle** are being removed and replaced with inferior aftermarket catalytic converters to satisfy this requirement.