



Public Consultation on the Motor Vehicle Standards Act 1989 and regulations

The RAWS Association is an industry group with members operating Registered Automotive Workshops throughout Australia. This submission was prepared by the Association Board.

The Registered Automotive Workshop Scheme (RAWS) was intended to eliminate many of the problems that developed in the Low Volume Scheme and we believe it has been successful in returning the focus of the Low Volume Scheme to its intended purpose. However the legislation has insufficient powers to enable the RAWS scheme to be enforced and function as it was intended. Any review of the Motor Vehicle Standards Act (MVSA) should give particular attention to enforcement powers included in the legislation.

The intent of the RAWS scheme is good in general, and in particular it makes available to the consumer specialist and enthusiast vehicles that would not otherwise be available. Compared to other countries with larger populations we do not have the economy of scale when it comes to vehicle selection and options. The SEVs Register is testament to the desire of Australian consumers for vehicles not supplied in normal volume. Manufacturers and suppliers have great influence over both choice and pricing of the vehicles available to us as consumers. Examples of the disparity in pricing between new vehicles supplied to the US market and the same vehicles supplied to the Australian market are contained in the following table:

Make	Model	US Price (AUD)	Aust. Price (AUD)
Toyota	RAV4 AWD	26,869	31,990
Mazda	6	22,770	37,041
Mercedes	S600	178,629	433,201
Porsche	911	91,575	228,000

The concessional schemes available under the MSVA give Australian consumers more choices without having any great impact on local manufacturers and suppliers. RAWS vehicles account for a small proportion of the concessional vehicles currently imported and account for less than 1% of the vehicles (new and used) entering the market each year.

SEV's eligibility restricts the importation of vehicles not available in Australia under the concessional systems as per the MVSA and Regulations to protect local manufacturers. In light of the changes to the automotive manufacturing industry in Australia since the last review, it is felt that there is considerable opportunity to broaden the range of vehicles permitted to be imported under RAWS, provided that effective enforcement powers for the Regulators are installed.

The majority of vehicles imported under SEVS are of a satisfactory safety and emissions standard retaining the components installed by the original manufacturers. Replacement of components in servicing should be limited to general service items - air, oil and fuel filters (where these are part of normal vehicle servicing), brakes pads/linings and rotors where not roadworthy, and tyres. Replacement of carbon canisters and catalytic convertors should be limited to when these would be replaced in the course of a dealer service due to wear and tear.



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There would be significant benefits to altering eligibility to enable any vehicle not currently supplied in Normal Volume to be permitted, up to a maximum age of 10 years from build. This would hasten the reduction in age of the vehicle fleet, reducing emissions and improving safety. There would still be the requirement to demonstrate compliance, however limiting the age and country of origin would mean that emissions and occupant safety would no longer require expensive testing.

Limiting the age of imported vehicles to 10 years should not be applied retrospectively. Vehicles currently on the SEVs Register should still be permitted to be imported and added to a RAWs Workshop schedule, they will eventually age out of the system. There would need to be some concessional or transitional arrangement in place to allow existing RAWs workshops to continue importing the vehicles they currently have on their schedules.

The burden of regulation is evident in the process required to amend or update documents such as the Motor Vehicle Standards (Approval to Place Used Import Plates) Guidelines which was last updated in 2006; the Guide to the Registered Automotive Workshop Scheme refers to ISO 9001:2000 which is an obsolete standard as per JAS ANZ (only ISO9001 : 2008 is permissible); the National Code of Practice - Steering Conversions For Left Hand Drive Vehicles (VSB4) issued in 2002 is out dated and has been under review for many years with no outcome or expected completion date.

The ADR's are extensively aligned with the UN ECE regulations. The Department of Infrastructure and Transport issued notification in July 2012 that the E mark is automatically recognised however this is not applied to RAWs (eg unrestricted motorcycles with E Marked Lamps) which is inconsistent with their ruling. Australia contributes to global harmonisation of vehicle manufacturing standards (Global Technical Regulations). The use of ECE regulations as an acceptable alternate standard to the ADR's questions the effectiveness of the ADR's in today's age. All of which demonstrates the need to have mechanisms in place to more quickly respond to change.

We believe that certification operations such as RAWs and the Low Volume Scheme should be mandated operations that are accountable. However the burden of ADR compliance should be relieved if the imported vehicle comes from either USA, Europe/Britain or Japan and build compliance can be validated to JIS, ECE FMVSS etc.

In closing we would like to thank you for the opportunity to make this submission and look forward to further public consultation should a review of the MVSA proceed.

Yours Sincerely,

The RAWs Association Board

David Noble	Chairperson
Fay Miller	Company Secretary
Bruce Gearing	Treasurer
Christian Elliott	Board Member
Michael Longdon	Board Member