

# Japan Imports Pty. Ltd.

8 Lathe St, Virginia QLD 4014  
PO BOX 612, NEW FARM QLD 4005  
Phone: 07 38658892  
Mob: 0418721818  
Fax: 07 3254 0087  
Email: info@japanimports.com.au

ABN 31 081 127 442  
ACN 081 127 442



## RAWS APPROVAL NO 10201

Japan Imports Pty Ltd is a Registered Automotive Workshop importing used vehicles under the RAWS Scheme. This submission is mostly confined to sections of the Motor Vehicle Standards Act 1989 that relate to the RAWS Scheme and used vehicles imported under the scheme whilst also touching on the broader issues of safety and emissions.

### Vehicles Permitted To Be Imported

The RAWS Scheme was introduced in the 2001 amendment to the Motor Vehicle Standards Act 1989 to “balance the government’s commitment to the local automotive industry, the interest of importers and converters of used imported vehicle, and the consumers’ desire for specialist and enthusiast vehicle”.

The face of the local automotive industry has changed over the years with many new vehicles being manufactured off shore and imported into Australia. At the same time, the number of vehicles plated under the RAWS Scheme (motorcycles not included) peaked in 2008 at 9000 and in the years since has averaged at around 6000 per year or less than 1% of the total new and used vehicles supplied to the Australian market.

With Ford recently announcing it will cease manufacturing in Australia in 2015 there will soon be little automotive manufacturing undertaken in this country. Australians have typically not had access to the variety and range of vehicles available in more populous countries such as Japan and USA. With less competition and fewer choices, vehicle prices have remained very much at the discretion of the retailer. Opening up the vehicles permitted to be imported under the RAWS Scheme to include any model not available would provide consumers greater choice and perhaps more competitive pricing.

In addition to opening up eligibility to include any model not available in Normal Volume, we would suggest that only vehicles aged 10 years or less should be permitted to be imported. Limiting the age of vehicles being imported would support the main objectives of the MVSA, occupant safety and emissions reduction. The age limit would not be applied retrospectively; it would only affect new entries to the SEVS Register. RAWS Workshops should still be permitted to import vehicles already on the SEVs Register and on their RAWS Schedule providing they hold evidence of compliance.

### Vehicles older than 15 years

We believe there is also a case for making provision for vehicles older than 15 years to be imported. Vehicles in this age bracket are attractive to the hard core enthusiast and should be allowed within the following framework:

- Permitted to be imported by RAWS Workshops only
- New category for these vehicles
- Numbers to be capped at 100 plate approvals per RAW in 12 consecutive months
- Certified to comply with ADRs current at the time the vehicle was built.

## **New Category for Vehicles with Disability Features**

Consumers requiring vehicles with disability features have the option to purchase a vehicle in Australia and have aftermarket equipment fitted as new vehicle suppliers do not service this market. This can be quite costly and not all consumers in this situation have access to the necessary funds.

A more cost effective option for families struggling to provide care for their loved ones is a used vehicle which has the disability features they need. This option also provides the peace of mind that comes with knowing the equipment fitted to their vehicle has been installed by the vehicle manufacturer and has been subjected to the same quality control and safety testing as the vehicle itself.

The Government has recognised the special needs of this segment of our community with the introduction of National Disability Insurance Scheme. Whilst this is a step in the right direction in that it assesses the care requirements of the disabled and the services available to them, it does not clearly address their transport needs other than to offer taxi vouchers. Customers who have purchased disability vehicles from us want the freedom to include their loved ones in away from home activities through access to safe, comfortable and affordable motor vehicles.

There are currently thirteen entries on the SEVs Register for Welcab vehicles (the term used by Toyota Japan for their disability vehicle range) and are variants of five different models all manufactured by Toyota. Four of these models are imported in the MA category while the fifth is MB category.

What we would like to see is a new category for vehicles with disability features. The reason for this is there are currently no clear guidelines for either the RAW complying these vehicles, the Department of Infrastructure and Transport inspectors or the State Transport Authorities. This causes inconsistencies in the treatment of these vehicles. For example:

- The Department of Infrastructure and Transport has stated wheelchair positions are not considered seating positions. Japanese manufacturers do not count them as seating positions either. Some State transport authorities see wheelchair positions as seating positions which causes a conflict when compared with the seating capacity stated on the Used Import Plate.
- Some RAWs have been directed to include in the Vehicle Inspection Certificate a description of the disability features fitted to the vehicle, record the TECS code (each vehicle has a label containing a code which decodes to indicate the original disability features fitted to the vehicle) as proof the vehicle is in fact fitted with disability features. Other RAWs have not been directed to provide this information.
- From time to time State Transport Authorities have challenged the GVM of these vehicles citing the weight of the wheelchair is not included. This is a difficult problem to resolve given that every wheelchair is different and also brings up the question of how GVM is calculated.

To provide Australian consumers access to vehicles fitted with the disability features and ensure consistency in the treatment of these vehicles we would suggest the following:

Vehicles not available in Normal Volume with disability features:

- New category for this type of vehicle with clearly defined guidelines and requirements;
- Numbers to be capped at 100 plate approvals per RAW in 12 consecutive months;
- Only vehicles with disability features fitted by the original manufacturer permitted.

Vehicles available in Normal Volume fitted with disability features but not supplied to the Australian Market:

- Permitted to be imported by RAWs Workshops;
- Included in the new category suggested above;
- Only vehicles with disability features fitted by the original manufacturer permitted.

Yours Sincerely,  
Christian Elliott