

This submission is in response to Section **4B Other Concessional Options (Part 4 of Act and Regulations)**

- *Are there changes to the concessional options which might improve access to a broader range of vehicles for consumers without compromising road safety, environment and security outcomes?*

The 1989 Act was successful as a stop-gap measure to prevent a flood of Nissan Skylines from reaching the hands of those drivers who through a combination of age, inexperience and excessive power would pose a significant threat to themselves and other road users at that time. Since then, the vehicle market made available numerous makes and models, a selection of which have relatively high power, low weight, all-wheel drive and small dimensions. It was unsurprising that when vehicles such as those described above were widely available at prices that many young drivers could afford, there were many unfortunate incidents and accidents. I recall at the time that comprehensive insurance on one particular model for a young male was in the order of \$5000 per year, with the typical selling price of the car around \$15-20,000.

I believe that the threat has passed, and there should be a way of re-instating a rolling time period for which a vehicle may be imported without being falling under the existing RAW system. The RAWS system appears to have a significant takeup with the Japanese and US used car importation business, however the more obscure cars from Europe are not being complied by any, or very few workshops.

My personal issue with the current legislation is that I have been trying to import a good Lancia Delta Integrale. Whilst the 1988 version may be imported under the pre-1989 rule, they are hard to find in good condition. The more numerous 1989 and later models have ABS brakes, dual circuit brakes to each axle and use unleaded fuel, thus making them safer cars for road users and the environment. They are on the SEVS, and thus may be imported by a RAW – however I have been unable to located a RAW which imports them routinely.

I suggest that the following modifications to the legislation be considered.

- The 31 December 1988 date be replaced by a rolling 20 year limit.
- The import approval may only be granted to an individual, not a company. The individual be over 18 years old, and not have imported a vehicle under this scheme in the preceding 3 years.
- Compliance with the ADRs should be assessed (by any state registration authority or RAW) after the vehicle has been imported and placed in the care of the importer. Naturally the individual must ensure the vehicle is compliant with all relevant ADRs prior to submitting the vehicle for registration to the state registration authority.
- That the manufacturing date be the date that the vehicle first left the factory, unless significant performance or handling modifications have been made to the vehicle. The definition of “significant” modifications may be hard to defined and quantify, however there should be no impediment to someone bringing in a vehicle that has had its safety levels improved, such as brakes changed from a single circuit drum to an dual circuit disc braking system or seat belts fitted etc etc.

The threat the original Act was passed to prevent has gone, and it is time that the early 90s cars were made available to the motoring enthusiast community. The aims of my suggested

modifications are allow the 1989-1993 vehicles to be imported using effectively the same arrangements as the present pre-1989 system. This can be done sensibly, and with the safety and environmental improvements of the cars of that time frame, will be safer for road users and the environment as the present system.

Sincerely,

Simon Thomas