

The object of this submission relates to object 4 -

– regulate first supply to market of used imported vehicles (road registerable motor vehicles)

The purpose for the regulations is *to improve the safety, environmental performance and security of road vehicles in Australia.*

This is not being achieved effectively by the current application of the regulations which restricts the import of vehicles that would better meet these criteria.

Firstly, I would like to commend the department for the development and continuation of the current RAWS scheme. As a private importer I believe this has improved the quality of vehicles coming in under the low volume import system. The onerous and sometimes costly process has ensured the outcome is benefitting the collector/enthusiast rather than someone after a cheap car. However, I sincerely believe there is considerable room for expansion of the scheme in its scope and variety while maintaining safety standards and providing an expanding future for the industry that has developed around the scheme. I have been unsuccessfully endeavouring to obtain some statistics from the Dept of Infrastructure on the numbers and types of vehicles coming in to the country under RAWS however anecdotal evidence obtained from talks with RAWS workshops indicate that there has been an increase in the proportion of under 10 year old cars and that most of these cars have many recognised safety features found in newer locally released cars.

I have been perusing some of the submissions appearing in the web forums on low volume imported vehicles and I agree with the following salient points and I trust these points will be given due and balanced consideration:

Suggested Amendments

We need a nationally uniform system that is clear and fair, giving Australians access to the best possible vehicles from around the world at the lowest prices. The newest, safest and most efficient vehicles should be encouraged and restrictions to competition removed where vehicles are not currently imported through the traditional commercial retail market.

- Create an **Imported Vehicle Scheme (IVS)** based on the SEVS framework
- RAWs to continue under the same general guidelines
- Make it easier and less expensive for RAWs to add new models to their schedule
- Move towards adopting uniform UNECE international standards rather than separate ADR's

- Accept alternative emissions evidence to avoid expensive testing arrangements
- Allow OEM catalytic convertors and charcoal canisters to be retained, unless faulty
- Allow HID headlights (conversion reduces quality / safety) and general commonsense provisions when it comes to replacing many features standard on imports that are and can be demonstrated to be superior to local products (I am sure RAWs workshops could list many however they make money out of replacing these items – mirrors, filters tyres etc)
- Allow the import of any vehicle younger than 10 years, up to 500 vehicles per RAW per year. Quota to be reviewed and increased annually for gradual phase-in.
- Retain existing rules and quotas for specialist and enthusiast vehicles to meet niche demand
- Allow the import of enthusiast, classic or historic vehicles over 20 years old. Compliance by RAWs to ensure quality, safety and emissions standards. 100 vehicle quota per RAW per year. Vehicles with safety and emissions enhancements (e.g. brakes, suspension, steering, newer engines etc.) to be allowed.

These simple amendments would achieve the aim of the Act and Regulations, save lives, and benefit the environment. Many new businesses would also be created, resulting in a more innovative industry and thousands of new and sustainable jobs across Australia.

Amendments should be made to progressively remove the restrictions on imported secondhand vehicles while still maintaining the quality of vehicles imported through a monitored scheme.

With the closure of manufacturing plants in Australia, the perceived need for protection of local manufacturing jobs is more ill-founded than ever and employment opportunities could be created through more and varied vehicle coming through the RAWS scheme.

The current application of the rules appears to protect the interests of a handful of large international car manufacturers. This is not in the best interests of Australians, local business, road safety, or the environment.

There is always resistance to change however the many possibilities and benefits should be recognised and taken into account with this review. Current directions would indicate that the local car market will an import industry and the RAWS scheme caters for those vehicles deemed to be not cost effective for the larger companies. This is a tremendous opportunity to

make a real difference to road safety and the impact of Australian vehicles on the environment.

Yours Sincerely

Paul Curtis