

Dear sir/madam,

My name is John Clark. I am an Engineer.

I do not work for and have no vested interest in foreign or domestic motor vehicle manufacturing industries.

My last two vehicles have been imports. They are both great cars. The only problem was that across both vehicles I've paid in excess of \$14,000 dollars in compliance costs that ultimately achieved very little and was effectively "protection money" to the local Australian automotive manufacturing industry racket.

That \$14,000 dollars could have been better spent on investing the money for the benefit of my family and the Australian economy as a whole rather than being forced to sink it into the never-ending black hole of the protected Aussie vehicle manufacturing industry that is constantly on life-support.

Firstly, my condolences in advance for the fact that the public servants involved in this review will have their due process skewed at some point by elected officials who will (if history is any guide) misdirect a fair, thorough and balanced review for political reasons or because they lack the intestinal fortitude to "call a spade a spade".

From personal experience I know that the current regulatory regime adds A\$7000 to the total on-road cost of an imported vehicle AT ABSOLUTE MINIMUM. I'm also quite confident that if a thorough and holistic assessment of the costs and benefits of these costs were undertaken free from political influence it would find that a significant restructure and streamlining of these laws in order to reduce these costs would be of net-benefit to Australia and road safety.

The used car market in Australia is overpriced precisely because of these laws which effectively subsidise Australian vehicle manufacturers and restrict cost-effective access to a broader market of used vehicles which are perfectly safe and suitable for Australian roads.

If the news is accurate, our governments are subsidising Australian car manufacturing industries to the tune of billions per year. On top of that, every Australian pays \$7,000+ more than they ought to on the vehicles they buy because of these laws. With the exception of a few thousand employees in the Australian motor vehicle industry, this is not in Australia's best-interest. The cost per-motor-vehicle-industry-employee that we are throwing at this unsustainable industry is an eye-popping waste of taxpayer money. Furthermore, the end result (overpriced cars) adds to the already too-high cost of living (read: international competitiveness) in this country.

From speaking with other vehicle enthusiasts, it also appears that there are numerous other problems with these laws, such as:

- Self-defeating requirements such as the enforcement of **minimum** ages on modifications to vehicles (e.g the "1989 thresholds"). How on earth is it conducive to increasing road safety for these laws to be telling enthusiasts that they can't import vehicles that have current modifications that dramatically increase safety?
- As I understand it, the current laws essentially force importers seeking approval to import a particular vehicle model under RAWS to get the vehicle's emissions tested at

a single emissions testing facility (by my recall it's a facility operated by or for Ford Australia). They have no choice of facilities, and the fees that facility charges are in the order of \$20,000 dollars. I operate an ISO 17025 accredited public testing facility that is accredited to the highest standards in the country and this pricing sounds outrageously high. Furthermore, I'm quite certain there are many other testing facilities around the world that will conduct this testing to the same standard for much less. The Australian Government is a signatory to international treaties recognising the validity of appropriately accredited foreign testing facilities and importers should be allowed to use these alternate testing facilities. Anything less smacks of parochialism or protectionism.

- These laws as currently written prevent cost-effective access to competitively priced foreign used vehicles which means that the average Australian car is older (read less safe and less reliable) than it would be if these restrictions were removed.

To address these issues, my suggestions are as follows:

- Remove the current legislation and start from scratch.
- The new legislation simply defines the minimum safety requirements of vehicles (written in an "outcomes based" manner with as little prescription as possible) and the requirements placed upon Automotive Engineers in certifying vehicles to meet those requirements (and the penalties for Engineers failing to abide by these requirements).
- Imported vehicles cannot be road registered without a compliance certificate from the Automotive Engineer.
- These laws should apply uniformly to new and old vehicle imports. After all, there is no reason to differentiate between the two - the same requirements should apply for both.
- Create an effective monitoring and enforcement regime (including de-registration of engineers failing to comply with the law).
- The safety requirements should be aligned as closely to UNECE standards as possible/reasonable.
- There are no restrictions on the number of vehicles that can be imported or a minimum age.
- These regulations achieve the following outcomes:
 - Provide newer, more reliable vehicles to average Australians at a much lower cost which reduces their cost of living and improves their personal safety.
 - Removes the immense cost burden on the Australian economy currently posed by the protected/subsidised local car manufacturing industry.
 - Streamlines the vehicle import process, reduces regulatory red tape and public sector efficiency covering this subject.

Alternatively I also note that "across the pond" in New Zealand they have a fleet of road vehicles that seems to perform with safety metrics on par with Australia and other developed countries, yet their vehicles are substantially cheaper because they are not burdened with our regulatory regime. Rather than re-invent the wheel, why not borrow as much precedent as we can from New Zealand? It's hard to imagine how it would fail miserably for us in Australia if it works for them.

Yours sincerely,

John W Clark, Engineering and Design Manager