

AAIMA

AUSTRALIAN AUTO IMPORTERS & MANUFACTURERS ASSOCIATION INC

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Motor Vehicle Standards Act 1989 review

1. AAIMA submission overview

The data offered in the discussion paper is historical the reality is very different

We believe there are several issues that should be reviewed eg; Imported trailers, caravans, camper vans etc, however our focus is for reforms desperately needed for the survival and the financial viability of the RAWS industry.

- As at todays date there are 153 RAWs in Australia a long way from the high of well over 200 at the peak. This number is expected to drop even further and some workshops are currently only producing vehicles in very small (single digit) numbers per annum. The number of RAWs is not expected to grow, however it is expected to almost disappear within two years. Currently 8 RAWs in Perth down from more than 20.
- The numbers of vehicles produced is also well down.
- The SEVS register although extensive is very limited with a few only being possible or even viable to produce. The list of viable models will continue to get dramatically smaller with models like the Skylines, Supra and Delica etc almost finished. We currently do not have a sports car or people mover. (European vehicles are expensive and limited demand, and vehicles from USA very specialized) The SEVS list, compliance workshops and overall numbers also contains motorcycles and Trikes; this does not show true reality in RAWS viability.
- Our industry has invested large sums of money, employ very talented people to produce safe vehicles to offer the public a wider choice.
- We are not a financial drain on the public purse.
- We are not a threat to the new vehicle industry.
- We believe that our industry is sufficiently rigorously controlled and has integrity.
- Although we represent a minute segment on the market the review appears to have considerable focus on RAWS
- With main stream vehicles continuing to get cheaper our viability will continue to get even harder

2. What we are requesting

- Motorcycle “E mark” evidence accepted without the necessity to hold test reports from OEM
- The relaxation of some evidence requirements via concessions and acceptance of evidence using all UNECE regulations.
- Confirmation that the pending GTR (Global Technical Regulations will not adversely affect RAWS.
- Relaxation from replacing certain compliance components;

Catalytic Converters; We replace perfectly good units with inferior units that may meet emission requirements in the short term but usually have a short life, If a vehicle passes the gas test after compliance no replacement.

Carbon Canisters; as above but with evaporation system check

HID headlights; as above. All customers complain about poor light illumination after compliance conversion

We feel the replacement of the above items is unnecessary and a waste of the world resources.

- A better choice of vehicle for the public can be simply changed by opening eligibility for any vehicle that has not been imported under full volume.
- Old vehicles to be imported on a rolling 15 year old basis and signed off to ADRs as per year of manufacture and state and territory requirements by a RAW. Limited to 100 vehicles per annum. A concessional scheme within a concessional scheme would not compromise safety issues.

Summary

We are not and have never been a threat to the New Vehicle Industry and have never requested Government Financial assistance. However we are now requesting changes to the regulations so our small industry can survive.

FOOT NOTE

Canada has a 15 year rolling rule which appears to work relatively well. I would think that if we could achieve this the biggest hurdle would be the availability of suitable stock at the right price. The \$US will continue to get stronger and the Japanese earth quake and tsunami destroyed many hundred of thousand vehicle causing a shortage.

Bryan Hubbard

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