



Australian Electric Vehicle Association Incorporated

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Att; MVSA Review Team

Surface Transport Regulation Branch
Department of Infrastructure and Transport
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Submission to the May 2013 Consultation Paper on the Motor Vehicle Standards Act 1989

AEVA is a national association representing individuals and organizations involved in the design, development, manufacture, conversion, sale and use of electric vehicles and their components. The association was founded in 1973 and operates as a non-profit organisation.

In our specific area of interest (Electric Vehicles) our position is that vehicles available to be used on public roads, be subject to appropriate safeguards regarding electrical safety and suitability for Australian conditions. Where possible the guideline should match international standards and include additional measures if required to suit Australians conditions. Those vehicles not intended for public roads being for, research, display, exhibition, motor sport or competition should still have mechanisms available to allow these activities that are not cost prohibitive.

AEVA believes that the Motor Vehicle Standards Act of 1989 and subsequent amendments operates well in its current form to meet the stated objectives of the Act. In its administration there may be perceived weaknesses which can provide inequities and possibly risks concerning the low volume importation of certain types of vehicles. The decision to retaining separate ADRs over simply adopting UNECE international standards may be of consideration to improve the availability of vehicles brought into the Australian market, provided that the safety on public roads in Australia continues to be met.

AEVA, as an Australian organisation representing Australian based members, believes that the act needs to operate both to protect the interests of Australian entrepreneurial businesses in this area while also providing safeguards to any substandard or inherently unsafe products used on public roads. The requirements for imported vehicles that are not competing with locally produced or assembled product be relaxed enough in areas not affecting inherent safety to prevent unnecessary cost imposts.

Given the global environment and the state of the Australian industry the Act should continue to afford some continued realisation of value for the local industry and its customers. The potential dumping of used vehicles of inferior quality with reduced service and spare parts support is a distinct possibility and should be considered in any changes to the Act.

AEVA feels that special certification should apply to any entity seeking low volume importation of an Electric Powered vehicle for use as a registered vehicle on public roads, where that vehicle is likely to be re-sold to members of the public. Such vehicles should meet the relevant standards regarding electrical safety and suitability for Australian conditions, with the compliance being to the relevant guidelines.

As for lightweight low powered vehicles, such as electrically assisted bicycles do not present a significant safety risk in this regard, this regime should be applied only to those vehicles meeting certain criteria. With the proviso of course, that all electrical consumer products are required to be electrically safe.

Regards,

Jaron Ware
National Technical Standards Officer