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## Council of Heritage Motor Clubs - NSW Inc. -

**ABN: 49 109 228 949**

Address all correspondence to:  
The Secretary, CHMC  
PO Box 641

QUEANBEYAN NSW 2620

email: [secretarychmc@gmail.com](mailto:secretarychmc@gmail.com)

Department of Infrastructure

Email: [MVSAreview@infrastructure.gov.au](mailto:MVSAreview@infrastructure.gov.au)

To whom it may concern,

### **Council of Heritage Motoring Clubs NSW Inc submission on the DRAFT ROAD VEHICLE STANDARDS LEGISLATION**

#### **Introduction**

The Council of Heritage Motoring Clubs NSW Inc. (CHMC) welcomes the opportunity to comment on the Draft Road Vehicle Standards legislation.

CHMC represents heritage, historic and classic vehicle clubs across NSW, clubs whose members own and operate thousands of vehicles ranging from those built in the 1900s to the 1980s, (i.e. vehicles not heavily modified, customised or hot rodded). The primary purpose of those clubs and the Council is the preservation of motor vehicles as authentic and working examples of our automotive past.

CHMC appreciates the intentions of the proposed RVS legislation to modernise the system regulating road vehicles in Australia and in particular the simplification of the pathway for importing used (older) vehicles granted concessions against national vehicle standards.

CHMC considers that the proposed concessional pathway for vehicles 25 years or older will not result in a negative impact on the Government's policy outcomes for safety<sup>1</sup>, environment and security, yet will enhance flexibility and choice for Australian enthusiasts importing heritage or historic vehicles.

As CHMC only very recently became aware of the draft Road Vehicle Standards legislation we have had insufficient time to discuss the implications with our membership and receive their feedback. Council, for example, has not been able to collect comments from its motorcycle or historic truck membership in the period between it being alerted to the draft RVSA and the Submission deadline.

The following comments Council's Committee submits in order to meet the Submission deadline of 16 February 2018 and trusts that the Department will allow CHMC the opportunity to engage with it in further dialogue on the legislation and its implementation.

Heritage and historic vehicle involvement in vehicle crashes, as well as vehicle insurance claims, nationally are consistently very low. The combination of vehicle value to the driver/owner in time and money invested, plus relatively reduced road operating hours compared to other vehicle categories has meant these vehicles are assessed as low risk by all national insurers.

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### Discussion

1. -CHMC has not been able to locate any documents indicating consultation between the Department’s RVS Taskforce and the peak bodies representing heritage and historic motoring organisations and enthusiasts, i.e. the sector particularly concerned with vehicles 25 years and older.

CHMC considers it imperative that this sector’s input be considered by the Department as soon as possible. CHMC suggests that the Department engage in discussion with the national organisation, the Australian Historic Motoring Federation Inc. (AHMF) <http://www.ahmf.org.au/> and the various State peak bodies (AHMF affiliates) in the pre-commencement and implementation phases of the RVS legislation to ensure that the rules and procedures do not adversely affect those seeking to import genuine heritage or historic vehicles 25 years and older.

2. -CHMC seeks assurance that Registered Automotive Workshops (RAWs) and Authorised Vehicle Verifier (AVVs) will have access to and use the specialist knowledge relevant to the appropriate assessment of variants of heritage or historic vehicles 25 years and older for RAV compliance.

CHMC recommends that the Department compile, in consultation with the peak bodies indicated in 1, a database of specialists and experts within the heritage and historic vehicle community who can advise RAWs and AVVs on heritage and historic vehicles.

CHMC furthermore considers that it is essential that the input of the heritage and historic motoring peak bodies (whose stakeholders are best placed to provide the Department with the correct information on older makes, models and variants) be sort by the Department in determining the build data for 25 year and older vehicles.

3. -At the Sydney Information Session, the speaker suggested that VSB4 will need revising regarding LHDS conversions.

Council urges that heritage and historic vehicle representatives be included in VSB4 revision discussions as the retention of an imported heritage or historic vehicle in its original specification, including LHD, is increasingly important to enthusiasts and indeed can affect the value of the vehicle and its maintenance.

4. -CHMC seeks clarification whether the concessional option for vehicles 25 years or older only applies to cars and light trucks, or will it provide a RAV pathway for other types of heritage and historic vehicles, e.g. NB or NC trucks, historic buses and road going steam traction engines?<sup>2</sup>

5. -At the Sydney Information Session, the speaker indicated that if an imported vehicle fails RAV it would be sent back overseas or scrapped.

CHMC asks that this process be reconsidered for heritage and historic vehicles, not only for the cost/loss imposition on the owner but also in consideration that a failed heritage or historic vehicle may have significant residual value in Australia for spare parts.

6. -CHMC seeks clarification on the process for importing unrestored but complete heritage vehicles that will not in unrestored condition meet RAV compliance?

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The availability of heritage and historic vehicles for importation is limited numerically and by international value, even with flexible concessional pathways these vehicles will not have a significant impact on the age of the Australian vehicle fleet.

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7. -CHMC seeks clarification on the RAV status of heritage or historic vehicles altered after RAV listing - e.g. a vehicle imported as a vintage 2-seater roadster and meets RAV compliance, subsequently is fitted with a period correct but new build 5-passenger touring body – is its RAV listing editable and the RAV compliance plate changed?

### **Conclusion**

CHMC thanks the Department of Infrastructure for this opportunity to provide feedback on the draft RVS legislation. Should additional information be required or for further discussion regarding the matters raised in this submission, please contact us.

Ray Ives  
President CHMC

9 February 2018

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