

RVS Consultation Submission 21

RVSA review, issues arising from meeting:

Further to the below submission, I wished to expand on one topic, which was raised at the Sydney meeting, briefly mentioned in my first email below.

-SEV's, Calendar or Vehicle build date based? At the meeting it was put forward that it was to be calendar/time based, and later it was put forward that it will be the same as it is now, vehicle build date based. It does not mention either in the Information sheets at present.

Questions that need further clarification on the Information Sheets:

At present, the SEV's is build date based. Under the proposed new SEV's scheme, **if the new SEV's scheme is vehicle build date based**, will it go back to the first manufactured date of that approved Make/Model?

An example would be:

Scheme is say up and running in mid-2019. A SEV's application is approved for a particular Make/Model on say 1st August 2019, which then guarantees that make/Model SEV's eligibility until end of July 2021, even if a different company achieves Full Volume type approval on that Make/Model after 1st August 2019. If the approved Make/Model started its OEM production run in say January 2019, does the SEV's approval cover that period of vehicle build dates as well? Meaning January 2019 to end of July 2021?

If it is vehicle date based, as it is under the current SEV's scheme, will RAWS approval holders be able to compliance those vehicles that were approved under a particular SEV's entry as above after the 2 years has expired? as the new RAWS still covers used vehicles (as well as new vehicles)?

Using the above example, that particular approved SEV's entry expires in end of July 2021, and say a Full Volume type approval was issued during its timeline to another company. Can a RAWS company still compliance used vehicles that were approved during that prior SEV's entry build dates, as in up to July 2021 build dates, after July 2021? (which is how the current SEV's scheme operates).

If the new SEV's scheme is calendar date based, the above example will not include those earlier vehicle build dates, as it is calendar based. Also, once a SEV's entry for a particular Make/Model is approved for the 2 years, it will take 6 to 12 months for most American RHD conversion companies to prototype the RHD conversion and gain RAWS compliance, thereby giving them only a short time period to re-coup their investment. Is this the case?

Thank you.

Regards

Allan Reed

US AUTOS Compliance Pty Ltd