

RVS Consultation Submission 25

Dear Sir / Madam

There are several issues with the proposed rules and CRIS. In particular, the high application / review fees and renewal frequency should be reduced / removed, with cost recovery instead from the end user through the Import Approval / other means. Under the proposed plan, applicants themselves will be financially penalized while others will benefit at no cost – no industry can effectively operate that way.

We submit the following points for your consideration, thank you.

Section 131 from the Rules – reapplication for a road vehicle on the SEVS Register:

Expiry of entries on the SEVS Register. If the Secretary enters a variant of a model, or a make and model, of a road vehicle on the SEVS Register, the entry expires at the end of the period of 2 years starting on the day the entry is made. Note: After expiry, the variant of the model, or the make and model, of the road vehicle may be re-entered on the SEVS Register by making a new application under section 114.

The re-application costs are much too high for a 2 year renewal period and would be an unreasonable impost on small businesses, particularly if each individual model variant must be applied for separately and the re-applicant must cover the cost while others benefit for free. The scheme cannot operate cost effectively for the industry on this basis.

Suggestions: 2 year renewal period for environmental category only (where efficiency standards may change more frequently). 5 year renewal period for all other categories. \$0 re-application fee. Multiple variants of a model should be allowed on the same re-application. Any additional costs to be recovered from elsewhere to share the cost fairly over those benefiting from the approval, e.g. cost of model report / import approval.

Section 117 from the Rules:

(1) The Secretary may enter a variant of a model of a road vehicle on the SEVs Register if: (a) the variant of the model of road vehicle:

(i) has not been provided in Australia, at any time, under a road vehicle type approval

This is a step backwards from the current scheme. It is also unreasonable to continue excluding a model for import when it is no longer sold here new.

Suggestion: Change this clause to read: “(i) it is not currently provided in Australia under a road vehicle type approval”

Under the CRIS:

- *Non-IWVTA type approval –the proposed application fee is estimated to be between \$1,750 and \$2,000.*
- *IWVTA type approval – the proposed application fee is estimated to be between \$700 and \$850.*
- *The proposed application fee for entry of a road vehicle on the SEVs Register is estimated to be between \$680 and \$800.*

The proposed costs are too high, are not fair to applicants, would be an unreasonable impost on small businesses, and an impediment to adding new models to the SEVS list, considering that:

- 1) Initial evaluation against the eligibility criteria should be relatively simple and quick
- 2) The first applicant would bear all the cost, without being able to recover that from others later benefiting from the application
- 3) Enthusiasts / members of the public would be discouraged from applying
- 4) Rare vehicles with limited numbers while meeting the eligibility criteria, may not be viable to apply for

Suggestions: Application fee of \$0 - \$100. Any additional costs to be recovered from elsewhere to share the cost fairly over those benefiting from the approval, e.g. cost of model report / import approval. Multiple variants of a model should be allowed on the same application.

Regards

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