

16<sup>th</sup> February 2018

To Whom It May Concern

Department Road Vehicle Standards

By E-mail [MVSAreview@infrastructure.gov.au](mailto:MVSAreview@infrastructure.gov.au)

Dear Sir/Madam,

Re:Draft Road Vehicle Standards Legislation

I write on behalf of the Australian Historic Motoring Federation which is a group of 9 State/Territory motoring bodies from mainland Australia that represent the Historic Vehicle Clubs from across the Country. These groups and clubs look after the interests of those with interests in Historic vehicles that are 25+ years old. We have over 100,000 members in our combined Councils.

We have been advised by one of our Council members that you are seeking input into the above mentioned legislation and that it closes today. That came from the Council of Heritage Motor Clubs NSW

We have had a phone link up meeting on Tuesday night and this matter was raised and we have support from the following Councils to the letter that the Council of heritage Motor Clubs (copy attached) has forwarded to you on this matter. We agree with its content and with the actions that it has asked for.

May we ask please that the following people who represent the supporting Council be kept up to date with this matter direct from your Department:

Neil Athorn Federation of Vintage Veteran Classic Clubs Victoria [neil.athorn@bendigobank.com.au](mailto:neil.athorn@bendigobank.com.au)

Neville Horner Council of Motoring Clubs WA [secretary@councilofmotoringclubs.asn.au](mailto:secretary@councilofmotoringclubs.asn.au)

Christine Stevens Queensland Historic Motoring Clubs [info@ftrs.com.au](mailto:info@ftrs.com.au)

John Palamountain Northern Territory Motoring Clubs [ipalamountain@hotmail.com](mailto:ipalamountain@hotmail.com)

Morvan Green Federation Historic Motoring Clubs SA [mmgreenl@bigpond.com](mailto:mmgreenl@bigpond.com)

Terry Thomson Council of Motoring Clubs Sydney [terry@tspm.net.au](mailto:terry@tspm.net.au)

Mike Beale Council of Heritage Motor Clubs NSW [mike.beale@inet.net.au](mailto:mike.beale@inet.net.au)

Due to time constraints with this matter the following Councils would like to be kept up to date with its progress as well please:

Secretary Association of Motoring Clubs [secretary@aomc.asn.au](mailto:secretary@aomc.asn.au)

Graham Gittins Council Australian Capital Territory Motoring Clubs [gittins@inet.net.au](mailto:gittins@inet.net.au)

Thank you for taking our letter as support for the submission made by the Council of Heritage Motor Clubs — NSW and we look forward to hearing from you soon on the outcomes of the matter after it has progressed further in Parliament or in meetings please.

Yours sincerely,



Neil Athorn

Secretary

AHMF



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# Council of Heritage Motor Clubs - NSW Inc.

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Address all correspondence to:

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

Department of Infrastructure  
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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.

<sup>1</sup>

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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The "HERITAGE MOTORING COUNCIL"

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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. (AI-IMF) <http://www.ahmf.org.au/> and the various State peak bodies (AI-IMF 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.

CI-IMC 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 sought 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?"

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.

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