

Submission 45 – RVS Legislation Consultation

16th February 2018

Road Vehicle Standards Submission

To; MVSA Review Team

After reading the Road Vehicle Standards Draft Legislation, I respectfully request that the Review Team consider the following points and amendments.

The Government has acknowledged that “the current criteria is declining as these vehicles get older” (Frequently asked questions December 2017) but it is in fact tightening the criteria under the new draft legislation.

PROPOSED SEVS ELIGIBILITY CRITERIA

1. Performance Vehicles

Criteria has been tightened meaning less vehicles eligible. 941 vehicles were imported in the last 12 months, this will decrease to approx. 300 under the new scheme. You are increasing the threshold which means Consumers/Enthusiasts will miss out on an extensive range of enthusiast vehicles that should be eligible. Why start this at 1992? when the new 25year rule becomes law in 2019 no pre-1994 vehicles will be imported under this criterion. Under this proposal most enthusiast vehicles that are not actually under a type approval will be excluded.

Not good for the consumer.

2. Environmental Performance vehicles

A slight relaxing of the criteria but there were only 78 vehicles imported in the last 12 months under this option. This should increase to around 500 per year. Include make and model not currently available in Australia and leave the emission standard at “time of manufacture”. Current sales by new car manufacturers are minimal due to the high retail prices. Allow vehicles that are around the 7-8 year mark, (previous emission standards) which will be sold at a price that is within the range of the average consumer. More Environmental Performance vehicles on our road must be good for our future. Let’s not live in the past.

Again, not good for the consumers and the environment.

3. Mobility Vehicles

A slight tightening of the legislation. Currently 340 imported in the last 12 months but this included 2nd stage manufacturing. Current proposal is only for original manufactured and modifications endorsed by the Manufacturer. This vehicle type will decrease to around 200.

Include 2nd stage manufacturing. Remove requirement to be endorsed by OEM manufacturer. Will prove almost impossible to get information, tie up huge resources of the department and restrict a vast range of vehicles. State and Territory legislation will cover minimum Australian standards.

Not good for the disability sector

4. Rare Vehicles.

New vehicle category but very limited and uneconomical in such small numbers. If it is not sold in Australia it is rare for the Australian market. Maybe up to 30 vehicles per year will be imported. Change variant to 500 and include vehicles not currently sold in Australia. Manufacturers will not be forthcoming with detailed production numbers. The averaging component further restricts eligible vehicles. What happens if a manufacturer stopped production for one year?

5. Left Hand Drive Vehicles

A tightening of the legislation, by way of restricting vehicle categories, will mean less vehicles being imported. Only 178 imported in the last 12 months. This will decrease under the new legislation to approx. 120 vehicles per year. Remove restrictions on vehicle categories. There have not been any safety issues on converted vehicles in the past. Why not allow newer vehicles with updated safety features? These vehicles, mainly for the USA are considered safer than current Buses and Trucks being imported under type approval from certain Asian Countries.

6. Campervans and Motorhomes

Criteria has been tightened. No 2nd stage manufacturing. Estimated only 80 will be imported per year. Allow 2nd stage manufacturing of legitimate Motorhomes and Campervans. I realise that you are trying to close a loophole that the current

legislation was not intended for. But you are also closing legitimate businesses that supply a large number of Motorhomes and Campervans, at affordable prices, to the elderly and retired community, who in turn support small country towns and outback Australia. Discussions have already taken place with the department of on compliance and certification of second stage manufacturers.

By removing the unusual design feature from the current criteria, we will lose another 500 vehicles per year. Unusual design features are mainly features that local car manufacturers choose not to include in their vehicles sold in Australia but are standard features in other countries such as Japan. So why not take this opportunity to give Australian consumers choice?

The above changes will maintain market share at around the current mark of less than 1% of new car sales. This hasn't affected new car sales in the past and continue not to in the future.

The numbers add up as follows.

Vehicles imported under RAWS in the last 12 months not including bikes

5,936 units

Estimated vehicles imported in 2019 under new scheme not including bikes

1230 units

RAWS WORKSHOPS AND AVV COMPANIES

The draft legislation allows for vehicles to be complied and inspected by an AVV overseas. All vehicles should have a pre-import inspection done by an independent authorised Company before leaving the Country of origin. No vehicle import approval should be issued with this inspection. The RAWS workshop and AVV Companies should be in Australia only and Australian owned. This will give the consumer better protection through the ACCC and Australian Consumer laws.

SEVS EXPIRY

The draft legislation has a two-year expiry on all SEVS entries. This will increase costs, red tape, while giving the RAWS workshops and importers insufficient time to market vehicles and recover setup costs. Why would a business take out a lease on a workshop when there is a good possibility that in two years' time their livelihood could be taken from them? Leave the Entries as they are with no expiry date and remove type approved vehicles 2 years after they are entered on the RAV.

Media releases by the Minister and his department, over the last two years, have stated several misleading comments including;

“COMMERCIALY VIABLE SUPPLY OF A WIDER RANGE OF VEHICLES”?

(INFO SHEET 4 REVISED AUGUST 2017)

How is a reduction of 79% or 4,696 vehicles imported become commercially viable?

“IMPROVING CONSUMER ACCESS TO IMPORTED SPECIALIST AND ENTHUSIAST VEHICLES”

(MVSA REFORM REVISED AUGUST 2017)

A reduction of 79% or 4,696 vehicles imported does not improve consumer access.

“THERE IS CONTINUING CONSUMER DEMAND FOR SPECIALIST AND ENTHUSIAST VEHICLES”

(INFO SHEET 4 REVISED AUGUST 2017)

But the Government proposes to reduce imported vehicles by 79% or 4,696

The Department released a “Frequently asked questions” paper Revised December 2017, again with misleading comments.

In the paper they state the legislation will;

“give Australian better access to specialist and enthusiast vehicles and provide significant savings for businesses”

“reduce red tape”

“Provide consumers with a range of vehicles that are not otherwise available in Australia”

The CRIS proposal states that “it is not expected that costs for small business will increase – and may be reduced overall”

I believe that the suggestion I have put forward will go a long way to improving consumer choice while saving jobs and small businesses. I am happy to answer any questions relating to the above and look forward to your favourable response.

Regards

Murray Robertson

8 Energy Cres

Molendinar QLD 4214

Mob 0416 080127

