

Submission 46: RVS Legislation Consultation

Dear Sir/Madam

I am the sole owner and manager of a small importing vehicle company and this is my submission to the proposed changes to the Motor Vehicle Standards act 1989.

Firstly on the proposed changes to the act; I am still unsure as to why there needs to be such drastic change. Many businesses have made the current model work well for them. I believe there needs to be some changes moving forward but not negative change that affects previous hard work performed by many to make their current business model work.

This includes the deleting of current approved vehicle on the SEVS register. I feel if a RAW has completed all the necessary requirements to have a vehicle added to their list at the time of application, then this shows that the vehicle is allowed to be imported and should stay this way for its entirety.

New applications after the Motor Vehicle Standards reform should be judged under the new law at the time of application. This would mean those who have spent many thousands of dollars on adding vehicles will be allowed to keep what they have worked hard for; not to mention the fees paid by them to do so. This would allow for a greater transition period for business while progressing to the new system over time.

The proposed new eligibility requirements are too restrictive. Why are we making it harder to import cars especially since we have no manufacturing here?

Power to Weight Ratio

Increasing this slowly year by year will eventually mean no cars will be able to be imported under this rule. Manufactures are not increasing the power their vehicles are making, they are decreasing it for fuel efficiency. The current set power to weight limit should be adopted with no addition per year.

Environment category

Any car that has low emission or low fuel usage and not just hybrids should be allowed import. An example is the Nissan Cube which is very fuel efficient and many others like it should be allowed import under this heading. Importation of just hybrid cars from overseas could cause an issue with serviceability and safety for repairs and service of these cars. If there has been no training available here, battery powered vehicles can cause death if worked on improperly due to high output of the battery system.

Disability category

This category should be expanded to include cars that can be made disability approved. The small numbers of factory made disability vehicles in Japan are very expensive. This stops supply of cost effective, quality disability vehicles to the market here, depriving disabled South Australians.

Rarity should be adopted for vehicles unlike any produced here, this would include limited runs of vehicles and any other that was sold here

LHD category should contain vehicles that are LHD, not produced in the importing country stay LHD a reasonable addition could be limited to non-commercial vehicles and 5-10 years old.

Motorhomes category could stay as is if the above changes are adopted to the other categories.

Elgrand and Estima

The current stigma surrounding these vehicles is poorly researched. I do agree that the Estima does resemble a Tarago so I can see why this has caused an issue. However the Nissan Elgrand and other similar people movers are not like anything else provided here and as such isn't this what SEVS are all about?

At the current consultation there was a comment made that these cars are too old, yet the Elgrand E51 is current all the way to 2010/11. Also there is current evidence for this model as a non-camper imported vehicle and E52 from 2012. Many business's make good money providing these vehicles to growing families that can't afford to spend 50k on a new people mover. The second hand AUS people mover market is filled with aged high km, mistreated cars. Having an option to import a safe low km, good quality vehicle for families is exactly what we are trying to do with this reform.

If the new law proceeds with no change these points should be addressed:

Section 117 – Has not been provided at any time, be change to is not currently provided In Australia

Section 124 – variant – to be changed to any variant to the current supplied AUS model including engine output, exterior or interior styling hardware ect. If there is any difference to the model that was produced for AUS then this should qualify no matter how small.

Cost recovery / reform

The current cost recovery model could be better proposed for current businesses.

There should be a lower cost for the application of a vehicle onto the SevR. Such a high cost will make it difficult to add vehicles. Once approved the nominated cost be applied. Cars added should stay on the list and not be removed and be re-applied for every two years. This seems a way to stop imports in the end. Ongoing costs should be scrapped as there are enough costs to have vehicles added, or a yearly subscription.

How it will affect me

If the current law is changed as proposed then this could mean the end to small business that deals in imported vehicle resale and supply. A lot of us supply quality vehicles to people who can't afford similar vehicles built for Australia. These are all used vehicles so this does not affect the new car manufactures and their current profit. Allowing the current system to stay and reforming it for all newly applied vehicles is a much better approach. Drastic change as suggested will put many out of the auto business when it's already struggling.

Kind Regards,

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Owner/Manager

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