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## Norden Conversion

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Quality  
ISO 9001

SAI GLOBAL

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### 2018 Public Consultation on the new Road Vehicle Standards legislation



Norden Body Works was established in 1959 as a truck body builder. Today the majority of our work is converting vehicles for improved accessibility, particularly for transporting passengers in wheelchairs.

We are making this submission on the RVSA 2017 draft bill and rules to help protect the safety of people with disabilities. We are motivated by the following obligations that we feel our society and government owe to these disadvantaged people.

1. People with disabilities are entitled to expect that vehicles with special mobility features meet all of the relevant safety standards.
2. The level of safety of vehicles with special mobility features should not depend on the pathway used to bring the vehicle to the Australian market.
3. People with disabilities need adequate service and parts support for their vehicles.

One of the primary objectives of the Motor Vehicle Standards Act (MVSA) is to control the safety of road vehicles entering the Australian market. This objective is particularly important for vehicles designed to assist people with disabilities.

The focus of the changes to the MVSA is to strengthen and modernise the legislation and continue to deliver world-leading standards in community and environmental safety. The current legislation has some weaknesses in relation to vehicles with special features to assist people with disabilities. The changes to the legislation should address these weaknesses while still providing more choice to consumers.

The RVSA draft bill and rules will allow for the importation of vehicles under new Mobility criteria. These criteria do not mandate that imported vehicles must meet the relevant Australian standards for wheelchair accessibility and transport (including AS 2942, AS 3856 and AS 10542). These standards protect the safety of wheelchair passengers and apply to vehicles modified in Australia for wheelchair accessibility. Norden recommend that the relevant Australian Standards be mandatory requirements for vehicles brought into Australia under the Mobility criteria. This will put Australian vehicle modifiers on a level playing field with importers and more importantly assure buyers that all vehicles meet the same safety standards.

The RVSA draft bill and rules do not require importers of Mobility vehicles to provide adequate spare parts and service. This means that people who need these vehicles may not be able to get their vehicles repaired in a reasonable time, or possibly not at all. This can have a far greater impact on people with disabilities as they have fewer options for transport if their vehicle is off the road. Norden recommend that local parts and service support be mandatory requirements for vehicles brought into Australia under the Mobility criteria.

The abovementioned lack of requirements for meeting Australian Standards and for providing spare parts and service lead to another hidden risk for users of mobility access vehicles. This arises when they need repairs or modifications to vehicles that are not supported by the importer. In those cases they have no choice but to seek the support of a local vehicle modifier. Under the chain of responsibility for vehicle safety this local modifier is obliged to ensure that, after their work is completed, the vehicle meets the relevant standards. Because the original imported vehicle may not have complied with the Australian Standards it may be very costly or even impossible to bring the vehicle up to standard. Therefore, a relatively small repair or modification may become a major issue.

Norden appreciates the opportunity to offer this submission on the RVSA 2017 bill and rules and we look forward to the response to the public consultation.

Yours sincerely,

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