

Submission 57 – RVS Legislation Consultation

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Dear Sir or Madam:

After attending your Perth information session I will like to submit the following points;

Letter of compliance importation method;

The current method should be included in RVS bill as all vehicle(s) imported will demonstrate compliance as per the full volume vehicles, and this method will be easily administered by the department with little resources required to administer.

SEVS eligibility in particular the definition of a variant;

A SEVS listing purpose is to provide the consumer with choice of Specialist and/or Enthusiast purpose.

It is 'critical' to the intent of the new legislation.

The current proposed definition "*a vehicle within a model that has a different body, transmission or propulsion system, or is a different vehicle category.*" This definition will in fact *restrict* the Australian public from access to genuine SEVS vehicles, which are a different variant to what is available in Australia. Many manufacturers offer different variants of a model, which share the same body, transmission and engine but are in fact a specialist vehicle.

Proposed definition

A variant is defined as a vehicle within a model that has a different body, transmission or propulsion system, or is a different vehicle category or is marketed as a 'special edition' or version of the vehicle which is factory fitted with parts not available as options in the full volume supplied vehicle, these may include but not limited to; engine performance upgrades, body modification (aero bumpers, wide body kits), and interior packages.

The definition of a variant maybe the single factor that restricts motoring enthusiast from genuine SEVS vehicle which I feel is not what the new RVS is trying to achieve.

Two examples of genuine SEVS vehicles which would not qualify under variant;

1. Subaru WRX STI S204 – Share the same body, transmission and propulsion type as the Australian delivered WRX STI however was in fact a limited edition of 600 examples costing substantially more than the standard WRX STI and featured many differences.

“The performance parts include a large-sized twin scroll ball-bearing turbo, sports ECU, sports catalyzer, titanium sports muffler, silicon air intake duct, air cooled engine oil cooler, high strength casting pistons, STI large size intercooler, hard type engine mounts and balanced engine internals.”

Source: <https://www.supercars.net/blog/2006-subaru-impreza-wrx-sti-s204/>

2. Mitsubishi Evolution X FQ-variants

Again the same transmission, body and propulsion system as the Australian delivered vehicle however viewed by the motoring enthusiasts and vehicle manufacturers as a different vehicle with justification through a substantial difference in price and modifications lists at manufacturing.

UK models [edit]

UK cars kept the Evolution X name.

- **GS** – Base Japanese GSR with Enkei or BBS wheels, 5-speed manual transmission, radio and music server (MMCS), Rockford Fosgate premium audio, iPod/MP3 auxiliary input port.
- **GSR SST** (FQ-300, FQ-330) – GSR FQ-300 with 6-speed TC-SST transmission with SST mode selection (normal, sport, super sport). GSR SST FQ-330 was released in 2009.^[38]

Variants:

- **FQ-300** – Engine rated 300 PS (220 kW; 300 hp) at 6500 rpm and 407 N·m (300 lb·ft) at 3500 rpm.
- **FQ-330** – Engine rated 329 PS (242 kW; 324 hp) at 6500 rpm and 437 N·m (322 lb·ft) at 3500 rpm.
- **FQ-360** – Engine rated 359 PS (264 kW; 354 hp) at 6500 rpm and 492 N·m (363 lb·ft) at 3500 rpm. Carbon fibre front lip spoiler, rear vortex generator, gear knob, hand brake. Front leather Recaro seats.
- **FQ-400** – Engine rated 410 PS (300 kW; 400 hp) and 542 N·m (400 lb·ft) of torque. It also includes 5 speed manual transmission, six-piston brake calipers, upgraded brakes and 18-inch wheels fitted with Toyo Proxes R1R tyres (summers) or Toyo Snowprox S953 tyres (winters), a new aero kit that includes additional cooling intakes, vents, a larger air intake in the hood and ducts. An estimated 100 vehicles would be made.^[39] It accelerates 0–62 mph in 3.8 seconds (est.) and has a top speed of 155 mph (electronically limited). Standard equipment for the range-topping Lancer Evolution X model is comprehensive, the FQ-400 coming with Bluetooth hands-free telephone connection, a CD-tuner with 30 GB hard drive, DVD satellite navigation and privacy glass. Convenience features like remote central locking, automatic headlamps and windscreen wipers increase the FQ-400's ease of use. Available from June 2009, the FQ-400 is covered by a three-year / 36,000 mile warranty. Cost £49,999 (list price).^[40]
- **FQ-440 MR** – Engine rated 450 PS (330 kW; 440 hp) Released in 2014 as a special edition with only 40 units available. It was available in only the Frost White colour priced at £50,000.

(Snapshot listing of page using the terminology of *variant* also)

https://en.wikipedia.org/wiki/Mitsubishi_Lancer_Evolution

Also featured in Australian online publication.

<https://www.carsguide.com.au/car-news/fq-400-the-ultimate-mitsubishi-evo-16639>

Holden Commodore/ HSV GTS (Local example from Australian manufacture.)

Hypothetically if the standard V8 commodore was available in the Australian market and the HSV GTS (or any HSV model) was not, the HSV GTS would not

qualify (under proposed definition) as a variant as it is fitted with the same transmission, body and propulsion system. As you would be familiar with these vehicles it is clear that the HSV would be a 'specialist and enthusiast vehicle' and is infact a variant of the commodore.

RAV

During the workshops it was said that racing vehicle are deemed a non RAV vehicle, has consideration been made for "rally vehicles" which do get registered under a "racing" or "restricted" license, will it still be possible for the states and territories to still license these vehicle if they do not appear on the RAV.

SEV Register 'duration'

The current proposed 2-year duration of a SEV ruling will make the system unviable and risky for business. This should be increase to 4 or 5 years. The basis behind this are as follows;

Timeline:

1. SEV entry approved
2. RAW searches for suitable vehicle to purchase and ships to Australia
- (3months)
3. Model Report developed with engineers - (3 months)
4. Process of approval from the Department - (up to 6 months)
5. Vehicle ready for public - (9 to 12 months) in total

** The above time estimates are taken from current experiences in dealing with imported vehicles and would see them as relatively accurate under a new regime.

This will result in the importer only having a window of approximately 12 months to import the vehicle, with no guarantee that the model will re-qualify for the SEV register.

With the cost associated with developing the Model report and all associated fees it will be unfeasible for any business to import vehicles once again restricting the consumer from a range of SEV vehicles.

Yours faithfully

David Bobowski

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