

Submission 70 – RVS Legislation Consultation

To whom it may concern

I recently added one of the information days put on by the department which was supposed to inform and clarify the changes that are being put into place, unfortunately I came away from the meeting more than a little disappointed and not any more informed than before.

The presenters seemed to be very knowledgeable in a broad sense, but not when it came to very important and relevant questions put forward by the guest present.

Whilst I am one of the first people to stand up and say that the present system has multiple floors, I can see the same thing happening again in the future.

On top of that it seems as if the people putting the new system into place are bending over backwards to make allowances for the section of the old system that I would have considered to be one of the biggest problems, it seems to me as if the people that import Estimac and Elgrand are being given more consideration than anyone else. As an approved engineer working in the public sector and inspecting modified used vehicles on a daily basis I can say with certainty that the importers of those type of vehicle are among highest percentage of rule breakers.

I regularly carry out inspections where the vehicle need to be approved for additional seating and have an ADR category change, it's a very rare occurrence to across one of these vehicles that have actually ever had any changes made!

I have been in the auto industry my whole working life and have been in the import industry sector since the mid eighties and have seen many changes.

I originally worked with individual states gaining approval on imported vehicles, then moved into the old green plate compliance scheme. Then the RAWS was introduced and I was hesitant to get involved because of the complexity and cost, but we eventually took the steps to get step up and into the scheme. During the past 10plus years we have worked tirelessly to make an honest living from our family based business.

We added equipment and skills to our shop and eventually achieved a process of not only being able to carry out the work on the vehicles we import, but we could also carry out the required testing and evidence production to create and hold approval on a substantially large schedule.

We never at any one stage expected this to be a get rich quick scheme, but as I said we are a family business and we all looked at this as something we were investing both time and money in for the long term future. Now all of that is being thrown in the bin and the hundreds and hundreds of thousands that we have spent to date will be lost with only a partial return.

Mr Spencer said to one person at the meeting a question outlining some of these types of concerns to which he replied "Well you'll have the two year transition period to make your money back", that to me was just an uneducated and ignorant statement as he obviously has no idea how long it sometimes takes to get a return from some of these vehicles.

We kept adding vehicles hoping in the long run with a broad enough mix of vehicles over the years to come my family could eventually earn some dividends as well as make a secure living.

Maybe if we had have gone down the path of many of our competitors, and ignored the rules and regulations we probably would have made money. But we actually spent money on making sure every vehicle met with the compliance requirements and were happy with a small profit.

So that leaves still with many unanswered questions, most of which I have been putting forward now for almost two years.

1. Will my current schedule be worthless and null and void in two years , and if so how am I expected to ever recoup my expenditures ?
2. Will my current approved evidence packages be excepted as model reports ?
3. Who will set the costs for the AVV inspections?
4. If I find that I cannot afford to continue with the RAWS or that I cannot afford to start from scratch again, could I consider setting up as an AVV inspection facility ? As well as an model report provider ?
5. Is there anyway I can be compensated for the money spent on my soon to be worthless schedule.
6. What is the reasoning behind removing vehicle off the SEVS every two years ? and if I pay to have something added why can't I hold that exclusively or be paid to access my listing ?

Although I don't expect to get many answers that will be of any comfort to either my family or myself, I do look forward to your reply.

Regards
Robbie Holmes

A to Z Imports