

Submission 76 – RVS Legislation Consultation

Importation of NAVYA Arma by Flinders University Dec-Feb 2018, key issues

- **Application type:** his application was “SPV” (Special Purpose Vehicle). As NAVYA has 9+ seats it is a bus and he could apply under this category and thus minimise fees – see below.
- **Time delay:** He applied 23 December 2017/ 22 January 2018 they sought further information/ he responded same day/ he has contacted them a number of times – still no decision. He rang them this morning (12 February 2018), told it is with the administrator for final decision but no one available to talk to him. Still no decision
- **Copy of application:** He doesn't have a copy of his application – application is made on-line with DIRD. Once you have completed the on-line application there is a print option available on DIRD website. He chose to print and information printed was only his address details – not the detail of his application????
- **Information sought:** the details initially requested by DIRD included if shuttle would be used on road AND details of non-compliance with ADR. He stated shuttle would be used on-road and in relation to ADR compliance that 5 or 6 NAVYA shuttles had already been imported and his was the same.
- **Clarification sought by DIRD on 22 January:** despite Rocco response DIRD again asked for details of trial and if shuttle was to be used on public road, details of supervision, and details of ADR non-compliance.. On same day he responded, sending DIRD a copy of his DPTI application showing route/ supervision etc and a document prepared by RAA showing ADR compliance.
- **Clarification sought by DIRD on 12 February:** on following up today with DIRD he later received a request for two further bits of information: (1) evidence of compliance with the ADRs listed in the trial proposal AND (2) clarify why the vehicle does not meet ADR 58 — Requirements for Omnibuses.
- **Important issue for Rocco was fees payable:** Rocco had not previously not been aware of fees – unbudgeted. See explanation of the various fees below: Rocco made his application as an SPV as this minimised the fees payable by him. Significantly it meant he was not required to pay Luxury car tax. He was also exempt from GST as a University but did still have to pay 5% import duty, given costs paid some \$25K

In summary it was expected the clarification details sought by DIRD on 22 January are generic nature and should have been asked up front by DIRD if they had a common importation class for Shuttles/ Pods – this would benefit DIRD – less double handling, speed up application for DIRD (phone calls, follow-ups) as well as streamlining imports – transparent fees, application, details sought and speed up application. Likewise it would be expected that the request today (12 February) would be equally relevant to NAVYA or Easymile shuttles previously imported and it is unclear why this is not understood by DIRD? Now looks like his application will take 2-3 months, another significant business impediment???

Importation of Zero Pod NAVYA Arma by Aurrigo in November 2017, key issues

- **Application type:** his application was for a MV import licence (that is as a car). At no time did DIRD question the type of application being sought. Subsequently when he subsequent

sought review of fees, DIRD dismissed his review on basis that these are the fees relevant to the application class he made.

- **Time delay:** Roger reports he got considerable assistance from Linda Rasmussen and managed to get approval within 7-8 days. Probably as the path he took was one most commonly used. Yet as noted below when seeking relief of the Luxury Car and GST fees he was told these would be quickly refunded once paid. That is, he still had to pay the large amounts being demanded.
- **Copy of application:** like Rocco He doesn't have a copy of his application.
- **Information sought:** Roger was told he must pay some \$250K luxury car tax for 2 pods. He was eventually told he had to approach the ATO to challenge the luxury car tax and although told this would be refunded b he ATO is frustrated that he has to pay the amount in the first place. This amount has caused his management in the UK to seriously question the point of importing vehicles to Australia — it is a significant business impediment..
- **Luxury Car and GST Tax:** Roger maintains his high price is not due to any luxury in the pod. Quite the opposite, it is quite un-luxurious – high price is result of high development costs (AV) and low volume production. ATO has only agreed to refund the LCT and has also agreed to refund GST (\$22k for one Pod) due to purpose of Pod – research and development.
- **Import duty:** as with Rocco, Roger also had to pay import duty which I recall he said was \$8,000
- Both Rocco and in particular Roger very much welcome the review of the import process and are happy to assist.

In summary, the most significant issue, different type of application and the huge additional fees payable and the significant barrier this presents towards the introduction of MaaS. Moreover, even though the ATO will refund, he must pay \$ upfront which is crazy!!!