

## Submission 78 – RVS Legislation Consultation



### **Input to new Road Vehicle Standards Act legislation**

15 February 2018

Further to your invitation, please find our comments regarding the new legislation below:

#### **ADR Low Volume Compliance:**

We are concerned that the Low Volume Approval is now proposed to be categorized under RAWS. Unlike RAWS operators, we do not make any changes to the vehicles once they arrive in Australia. All our cars are factory built in England to meet the Australian Design Rule requirements.

We understand that there are substantial workshop and facility requirements to currently meet RAWS approval, but as we do not have the need to make technical changes to the cars we import, we do not need such a workshop.

We would prefer to see Low Volume Importers still classified into a separate category and we hereby make that request. If that is impossible and we are classified under the general RAWS category, please ensure that there is a separate sub-category for Low Volume importers, who do not require the current RAWS technical infrastructure.

Such an approach we believe is in line with your general approach to eliminate unnecessary complexity and the Government commitment to assist Small Business.

#### **New Production Passenger Cars category (NPPC):**

Currently, this NPPC category allows very small manufacturers to be represented in the Australian market, albeit limited to 25 units per annum. The NPPC sub-category also allows some further relaxation of technical requirements for these small manufacturers (who are statistically irrelevant to the overall vehicle market), particularly in regard to being exempt from crash testing.

We ask that this category be retained. This will allow us to continue to bring in specialist light weight Caterham sports cars for enthusiasts.

#### **In conclusion:**

Thank you for the invitation to attend the meeting and for seeking input from stakeholders. Continued recognition of Low Volume importers who also qualify under European Small Series Type Approval (ECSSTA) provisions, such as ourselves under the new regulations, is hereby requested.

Yours sincerely,

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