

Submission 9 – RVS Legislation Consultation

Dear Review.

Further to a submission I did a long time ago and recently attending the new review presentation in Perth on the 31st Jan 2018, being on the receiving of the Dept, importing important new transport technology, I am still concerned proposed changes to our ADR and vehicle and allied sections of regulations determining imports, is not going nearly far enough.

I think the whole system is so radically wrong that the whole system could be put in a fire and totally start from scratch again and this includes many of the people in the system and bring in fresh ideas and fresh people.

Get away from most of the mindless rules and regulations and replace them with practical common sense and with people there to serve the public and not there to justify their own existence and waste huge amounts of time and cost fortunes as well as destroying businesses and the stress seriously effecting peoples health and I speak from first hand experience.

I would go so far as to say a Royal Commission should investigate the Dept, the system and the people.

There would be some horrendous stories that would come out that would justify some form of compensation.

I am extremely concerned proposed reforms will not go nearly far enough

The whole system needs to be radically simplified as regulated detail can never keep up with fast moving and new engineering methods and to regulate old methods is simply delaying progress.

I think the Dept is kidding itself if it believes proposed new legislative changes will solve any problems and will be little more than more of the old system.

On Cost Recovery, if the Government expects some form or all Cost Recovery, then it has to be cost effective itself.

There has never been from my own experiences either credibility or accountability, just an absolute soul destroying, health destroying, business destroying nightmare without any logic with Dept employees hiding behind probably roomfuls with not a care in the world of the consequences, of mindless regulations, confusing, complicated, contradicting so much so my own Certification engineer got out of the business and the Dept's own employees can't even understand it.

I write from being on the receiving end of the Dept and quite apart from a need for a radical simplification of the whole system, there is so need for some employed in senior, positions in the Dept to either be redeployed or simply moved right out of the system because in my own situation, they were making arbitrary decisions on technology they didn't even understand nor prepared to

use discretionary powers they have or prepared to listen to other peoples (mine) opinion.

I ask the question, What are the new reforms?

I will answer that question to start with.

Downloading the Reform of the Motor Vehicle Standards Act 1989, it says " The Motor Vehicle Standards Act 1989 (the Act) **controls the safety, environmental and anti-theft** performance of all vehicles entering the Australian market for the first time both new and used.

I have highlighted because I wish to comment on the three.

Importing electric vehicles which is my only real interest, Safety is the only real issue as they don't have any CO2 emissions and now, most vehicles have good anti theft so that just leaves Safety and most modern vehicles have good lights, brakes, tyres, steering and other safety features so what are the reforms for?

Just scrap the whole system and replace it issuing probationary approval converted to full approval after a suitable qualifying period.

As I explained, what is so different about Australian conditions so why can't we save a fortune in time and use other countries certification.

The whole system including ADR's, the Import section need to be scrapped and replaced with a radically more simple and common sense system.

I don't think our country would blink an eye if the old system was completely disbanded.

If something is good enough to be allowed on other countries roads, why can't it simply be just imported, brought in to Australia, maybe for a probationary period as above.

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[Stigobike Interview In The West Australian](#)

My experiences in importing transport technology just shows the total stupidity of the whole system and I would be happy to explain in detail why.

I am extremely concerned the same inflexible and arbitrary mindset and many of the same people will remain in the new system and I saw that rear its head in talking with one of the presenters last Wed involved in vehicle safety.

Importing the Stigobike technology, I never heard such nonsense talked, one of the safest means of transport you could ever have much, much safer than kids skateboards and some of these people need to be replaced with some with some common sense.

I ask a question, in this modern age with electric vehicles including electric only bikes becoming much more of the norm, why doesn't the Dept have an Electric only Bike category and why does a bike have to be defined as having pedals? Why can't we have purely electric bikes which of course don't need or have pedals?

Following the Dept's refusal to allow me to import a 250W Stigobike because the Dept was so behind the times in not having an Electric Bike category but which was subject to an Appeal through the AAT (Administrative Appeals Tribunal) which recommended the Dept liaise with me which was way back 3rd May 2017 but which I was subsequently given import approval to import the lessor powered 200W version, identical in every way except just a mere 50W difference in power which would be handy for getting up steeper hills, why hasn't the Dept got back to me?

This example also showed the stupidity of the whole import system and why there is need for radical reform including the people involved in this decision making who clearly did not understand this technology.

I am more than happy to work with the Dept so we can have a much more common sense approach to the Dept.

Kind regards

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Theo Marshall