

## Submission 109 – MVSA Review

Dear Sir or Madam,

Thankyou for the opportunity to make a submission to your 2014 Review of the Motor Vehicle Standards Act 1989. I believe this is overdue and Australians deserve concise leadership on this legislation. For too long the importation of rare and collectable vehicles has been beyond the private individual in terms of compliance costs and gaining an import identification plate approval.

The imports of vehicles should be determined by age, international safety standards and co2 emissions, not by who owns the importation rights, if it meets ADR rules or if it was sold in mass volume in the past.

ADRs should be restructured and act as a safety advisory board to the government. International safety standards like Euro NCAP should automatically be accepted at time of registration in Australia. How can one vehicle be allowed to be imported under the personal import scheme and an identical vehicle not be allowed to be imported by an Australian resident because it doesn't meet ADR rules. There is an inconsistency in vehicle safety standards.

Here are some examples of rare cars on Australia roads that are currently ineligible to be imported under the existing vehicle import framework and why this review is justified from a car enthusiasts point of view.

1993 to 1995 XJS 6 litre V12 convertible. Less than a handful in the country but not allowed to be imported because Jaguar sold the earlier 5.3 V12 version to the Australian market under full volume.

2010 Toyota Corolla diesel. Never sold new in Australia but cannot be imported under the current legislation. Toyota Australia will not import it and will not allow any private individuals import it.

1999 Rover R8 Cabriolet. Approximately 6 vehicles imported privately through the personal import scheme into Australia. Can be imported into Australia under the SEVS program but the one off ADR compliance cost exceeds the value of the car.

1997 Rover 800 Turbo Coupe. No vehicles registered in Australia but not allowed to be imported because it shares some body panels with Honda. The engine, interior, bonnet, brakes, transmission, alloys all differ from Honda but the administrator has chosen to omit this from SEVS register.

Ford 2009 Focus RS Turbo WRC. No vehicles registered in Australia. Not allowed to be imported because Ford sold the less desirable 2.5 turbo version. Built in limited numbers and very collectable.

I am sure there are numerous rare and classic modern vehicles that cannot be imported into Australia due to the current overly restrictive legislation and I ask that Aussies be given the choice in future to own and drive whatever vehicle they like assuming it meets international safety standards.

The sevs register in its current format will have no place in a reformed motor vehicle standards act. I see it as a tool to allow certain specialist vehicles to be imported that don't fall within the proposed new vehicle import categories. It needs to be refined to cover enthusiast's vehicles only as originally intended, not Japanese people movers, American and Japanese SUVs and mass market sedans from around the globe. The eligible criteria could be refined to vehicles where total model production is less than 2000 vehicles etc.

One last reason for reviewing Motor Vehicle Standards Act 1989 is that the end of Australian vehicle manufacturing industry is nearing an end and there will be a deficit of available cars on the market and good quality used imported vehicles can fill this gap. These vehicles will generally come from RHD markets where safety standards are equal to or exceed Australia's ADRs like New Zealand, UK, Japan, Singapore etc.

Anyone should be able import a vehicle just like they can import a painting, antique furniture or some other item. I don't see why vehicles should be treated any differently particularly when they are already sold in Australia (parallel importing). Vehicle safety legislation should take effect when the owner intends to register the vehicle for road use.

I see only positives with a reformed Motor Vehicle Standards Act. Cheaper compliance costs, a more modern national fleet and more vehicle choices for consumers. I am sure OEM dealers will embrace the changes as they have in New Zealand. New Zealand Toyota dealers import and retail their own vehicles which are commonly known as Toyota signature class vehicles. These are ex Japanese used vehicles that are refurnished and sold with a 3 year warranty and backup parts support.

Thankyou again for considering my submission to your Motor Vehicles Standards review.

Miles Winchester