

Submission 11 – MVSA Review 2014

My company is Automobility Pty Ltd and we manufacture vehicles for wheelchair access. In addition, I am also an accredited Engineering Signatory.

The wheelchair access conversions we manufacture are performed in accordance with Australian Standards 2942 (now superseded), 3856 and 10542, with the vehicles being assessed under State Registry Authority requirements, including the assessment of the vehicle by an accredited Engineer.

However, it has recently come to my attention that there are wheelchair access vehicles being imported under the SEVS program – Toyota Wellcab is one example – that are being approved under RAWs.

The issue this causes is that neither RAWs or the ADR's include any consideration or requirements for wheelchair access vehicles and the compliance of those vehicles to the relevant Australian Standards. This then results in vehicles being registered and used that are NOT compliant in relation to the wheelchair access modification.

The particular areas of the Australian Standards that are not generally compliant for these vehicles include;

- No wheelchair occupant lap-sash seat belt provided. (Often no wheelchair user seat belt at all.)
- No wheelchair restraints compliant with AS10542 provided
- Ramp edge barriers not of compliant height
- Clearances for entry and internal heights inadequate.

The primary reason this is of such concern is that these vehicles are being sold by car salespeople who have little if any knowledge of the mobility industry or the existence of Australian Standards for wheelchair access vehicles. Further, often the usage instructions for the wheelchair access conversion are written in Japanese and not translated into English so it is quite likely the wheelchair access aspect of the vehicle is not even being used in accordance with the manufacturer's recommendations.

Further, many potential purchasers of these vehicles are also unaware of the requirements and are purchasing the vehicle on the strength of the parent vehicle manufacturer's reputation, ie, Toyota is a reputable company, therefore the vehicle must be "good".

I have raised this issue with VicRoads at a State level but they are only able to address the issues should the vehicle require expert assessment. As the vehicles are RAWs compliant and able to be issued with a certificate of roadworthiness, generally there is nothing to prevent the vehicle being registered.

Please contact me if you have any questions or require further information.

Kind Regards,



Jeff Watters

Director