

## Submission 148 – MVSA Review 2014

Thank you for the opportunity to comment on the proposal. I comment in so far as the proposal relates to reducing restrictions on second-hand vehicle imports to Australia.

The perspective from which I comment is as a professional engineer versed in transport safety standards and as a car enthusiast seeking better access to second-hand vehicle importation. ( I apologise for this hurried submission; I was only very recently made aware of the Productivity Commission's report and at the time of writing have not yet read the full report - nonetheless I hope my comments are helpful).

All vehicles imported to Australia must comply with acceptable design rules. While Australian Design Rules (ADRs) were originally introduced with good intent, I doubt that they are necessary or beneficial in the present context. I draw comparison with air transport regulation. Australia used to have unique aircraft certification design requirements for Australian registered aircraft. Those requirements were removed several decades ago on the basis that the certification requirements of recognised countries of manufacture were adequate for Australia. This has clearly proved to be the case, and I am confident that Australia could similarly remove unique design rules for cars without adverse impact.

Commercial import of second-hand vehicles must be carefully considered and controlled. Wholesale dumping of second-hand cars in Australia would be adverse and must be prevented.

As I understand current Australian vehicle import restrictions, it is prohibited to privately import a vehicle to Australia unless the vehicle is over 28 years old or it is imported by an Australian returning from residency overseas. If so, I consider this to be grossly unacceptable restriction.

Private motoring enthusiasts should be able to import vehicles which comply with an acceptable set of design rules and are deemed roadworthy. There should be a limit on the number/frequency of permissible imports to ensure that the activity is not commercial. Establishing that a vehicle complies with an acceptable compliance basis would not be administratively onerous. Such relaxation of private importing would certainly not swamp the local vehicle market.

I note that Minister Briggs has made reference to: "consumer access to vehicles at the lowest possible cost". Australian car enthusiasts are currently denied access to foreign markets where vehicles which meet totally acceptable design rules sell for significantly lower prices than comparable vehicles in the Australian market. I believe that the import monopoly of Australian commercial new car importers results in new and second-hand car prices which are typically significantly higher than in overseas markets.

Australians should be permitted to import vehicles with much less restriction, so that they can buy sound vehicles at competitive cost.

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