

# **Department of Infrastructure & Transport**

## **2014 Review of the Motor Vehicle Standards Act 1989**

### **Public Submission from David Blom.**

I wish to make my submission & have my say regarding the current regulations under the pre 1989 rule for vehicle imports & some points of discussion in relation to further harmonisation of Australian Standards with UN regulations.

#### **A 10 – 15 year rolling rule**

It is mentioned in the discussion paper the average age of the Australian fleet is 10 years. I believe the restraints of the pre 1989 rules are currently restrictive & perhaps contribute to some of these previously mentioned statistics.

By reducing the barriers to importation of good second hand vehicles to a 10 or 15 rolling rule this would allow many enthusiasts to import later model vehicles that not only would have better safety features but they would also be more fuel efficient & have improved emissions standards.

It is only fair to also mention the greater range of model choice, reliability & range would also open the market to car enthusiasts who previously were discouraged due to restrictions on importing a vehicle already up to 25 years old.

The other options for some enthusiasts to import later model vehicles through a SEVS scheme or a RAWS workshop is either a regulatory hurdle that is too hard or financially punitive.

#### **RAWS Compliance**

The existing RAWS workshops would still have sufficient volume under this proposal for those still wishing to bring in late model left hand drive vehicles or even compliance modified or heavy vehicles

#### **Compliance & Safety**

Acceptable levels of safety & compliance can be achieved from the following points,

- Current vehicle inspections that are conducted by the private sector prior to registration & ongoing registration inspections
- Safety standards acceptable on an international platform e.g. UN regulations or countries with design standards similar to Australia

## **Financial impacts & Other business Opportunities**

It has also been said the import of later model second hand vehicles could possibly devalue existing markets. It is my understanding that most vehicles depreciate over time all but the rare few.

Opportunities exist for other markets to emerge & create jobs due to specialised servicing & parts suppliers as well as businesses that can offer a one stop shop, sourcing & supplying specific vehicles to customer's orders.

## **Left Hand Drive Vehicles**

The current guidelines that allow for left hand drive vehicles should also be inclusive in the 10 -15 year rolling rule. The need for converting these vehicles to right hand drive is an unnecessary cost to no real benefit apart from convenience of ordering at a drive through fast food outlet!

Most European countries adopt left or right hand drive vehicles on equal standing & the existing provision for left hand drive vehicles in Australia be it the 30 year old rule (NSW), Carnet, Diplomatic or armed forces exemption has not proved to be detrimental to other road users or contribute to any accident statistics.

The protection of the consumer is also addressed by ensuring the imported vehicle meets a set of international standards which can be verified during initial inspection.

## **Consumer protection**

The actual protection of the consumer from dodgy operators or scams is ultimately up to the consumer to decide how & where they wish to spend their money. There are many tools at the consumer's disposal already to assist them in making an informed choice, much like is currently done when buying a vehicle by private treaty.

## **Harmonisation with international Standards**

On the subject of further harmonisation with UN or other international standards I believe this could help remove some of the regulatory burden & allow consumers to still buy safe vehicles at a reduced cost.

I would also like to reference the submission paper By the Australian Trucking Industry dated 21<sup>st</sup> June 2013.

Whilst heavy vehicles still need to be regulated I believe by allowing the specific ruling of vehicle widths to be set at the global standard of 2.6 metres rather than the current 2.5 metre rule. This would allow for some real options of alternative, efficient vehicles that would not be likely to have any real impact on other roads users. This could also allow for trailers previously unavailable to our market.

Our highways & infrastructure systems are more than capable of accommodating this small extension.

### **Implementation**

Implementation of these new rules could begin as early as late 2015 for late model second hand imports with further allowance into 2017 for the importation of new vehicles. This would also give the market time to adjust & also allow for industry to

### **Summary**

In conclusion I would like to summarise the following points

- A 10 -15 rolling rule be adopted, they are safer & more efficient
- Vehicles within these guidelines should be able to remain as left hand drive
- Further harmonisation would be beneficial with no detriment e.g. adopting the international standard for vehicle widths
- Consumers can make their own informed choices
- Industry & Markets will evolve & adjust

Thank you

David Blom