The Future Australian Automotive Manufacturing Industry

Supplementary Submission to the Senate Standing Committee on Economics

May 2015

The Australian Automotive Aftermarket Association

The Australian Automotive Aftermarket Association (AAAA) represents over 1850 companies nationally that are engaged in the manufacture and distribution of automotive aftermarket parts, accessories, workshop tools and equipment in a sector that turns over $11 billion per annum, exports $800 million worth of product and employs over 40 000 Australians. Our links to our colleagues in international markets are extensive. We have visited and hosted our collegiate associations from Asia and Europe and we enjoy a highly productive and intensive exchange of ideas and support from the American Specialty Equipment Market Association (SEMA) and the AutoCare Association. We travel extensively throughout the US, Asia and Europe attending and facilitating trade missions and we regularly receive market intelligence that we share with our exporters and aftermarket product development community.

AAAA members manufacture, distribute and fit motor vehicle components that:

- Last the life of the vehicle or are replaced irregularly during the life of the vehicle, usually as the result of a crash or a major mechanical failure – e.g. seats, instrument panels, engines, and transmission; or
- Are replaced regularly throughout the life of the vehicle because of normal wear and tear – e.g. filters, tyres, wiper blades, spark plugs, bulbs, batteries and brake pads.
- Are manufactured and distributed to maintain or enhance the appearance and performance of vehicles, including accessories, safety, comfort, appearance, entertainment and information, functional performance, body components, tools and equipment, mechanical, lubricants, additives and chemicals.

The economic contribution of the automotive aftermarket is significant. The market is growing due to the increase in the motor vehicle stock in Australia. There are 17.6 million motor vehicles serviced by aftermarket component producers and the number of registered vehicles is increasing by 2.5% annually, the average age of all vehicles registered in Australia is over 10 years. The Australian automotive aftermarket has earned an enviable reputation internationally as a supplier of world-class innovative automotive products and Australian manufacturers are known for their flexibility and ability to supply high quality product often in niche volumes in a timely and consistent manner.

Australian Automotive Aftermarket Association

Serving the automotive parts, accessories, tools & equipment industry in Australia since 1980.

The Automotive Aftermarket

Approximately 260 AAAA member companies manufacture product locally with around 65% of these companies (170) actively exporting. Automotive aftermarket manufacturing represents 36% of all automotive manufacturing in Australia - that's $5.2 billion per annum. And the aftermarket manufacturing sector alone employs 21,000 people directly and exports $800 million per year of locally manufactured product. The aftermarket segment continues to show strong year-on-year growth.

Not only is the aftermarket segment significant in terms of its size, but it has totally different drivers compared to the Passenger Motor Vehicle Original Equipment (PMV OE) segment. While some aftermarket manufacturers also supply OE components for fitment to Australian made or imported vehicles, the majority of product (85%) is sold to customers external to the car companies and their franchised dealer networks. Customers include wholesalers, retailers, resellers and end-users. Aftermarket products include replacement parts, accessories, vehicle modification and performance enhancement products and workshop tools and equipment. Many aftermarket manufacturers are expanding through high technology innovation with exports to Asia, Europe, Middle East and the USA.

The global demand for specialty components is growing in line with higher SUV sales and the ageing of the population is supporting demand for specialised vehicle retrofit components. The rise of global platforms, while representing a threat to local OE component producers, is generating opportunities for the development of accessories and modification products, first developed for local use and then exported. The Australian aftermarket has also been successful in branching out into non-automotive industry sectors, such as rail, defence, mining, marine and industrial, creating further opportunities for volume growth through diversification.

In the face of strong import penetration, our industry's response has been to move up the value chain - from service parts to high-value specialty products with a technological advantage such as 4WD, high performance and motorsport components. These products are purchased on innovation, performance and features rather than on price. This competition has created an aftermarket segment that has the right pre-conditions to be a globally competitive sector. These businesses have been successful because they have made significant investments in R&D and capital equipment and have a strong export focus.

If the full growth potential of the aftermarket manufacturing segment is realised, it can absorb some of the excess capacity, skills and knowledge that become available as the shutdown of the Australian domestic passenger vehicle sector plays out. In fact, the performance of both the PMV OE component and the aftermarket sector can be simultaneously enhanced through a holistic approach to policy setting which embraces both segments. There is a great deal of synergy in labour skills between PMV OE and aftermarket employees and it is quite realistic to assume that a growing and sustainable part of the industry can assist in absorbing some excess labour.

Introduction

The setting of industry policy for the automotive industry is one of the few areas of public policy in which successive governments have sustained a consistent approach over a period of decades. In the mid-1980s tariffs on imported vehicles and original equipment (OE) components were set at 57.5%. Over the ensuing decades, tariffs have been gradually reduced to a point in which the average tariff now rests at 3.5%.

As quid-pro-quo for opening up Australia's borders to ever increasing import penetration, the Australian passenger motor vehicle manufacturers (PMV) and their OE supply base have been receiving various kinds of transitional assistance. The more notable forms of assistance include the Duty Free By-law (DFA); the Export Facilitation Scheme (EFS); The Automotive and Competitiveness Scheme (ACIS) and since 2011, the Automotive Transformation Scheme (ATS).

What is now clear is that the trends towards global platforms, global engineering centres and regional purchasing has meant that the Australian landscape can no longer sustain global platform passenger vehicle production. Hence, a central premise about the intended end-point for this three decade-long policy process is in serious doubt and it is time for government policy to break with the past and re-define the intended transitional end game for the Australian automotive industry.

Now that policy makers can see that the expected and intended end point for the industry will most likely not be reached (i.e. a passenger motor vehicle manufacturing supply chain that can be sustained by domestic and export volumes), it is time to look at the automotive industry in a far broader sense than has traditionally been the case to pave the way for a transition by the industry to deliver a sustainable future.

In short, the aftermarket and PMV OE sectors, if considered together in the policy making process, can leverage their respective capabilities and performance potential.

On the one hand the aftermarket has made progress in accessing growing speciality component markets, both domestically and globally, as well as achieving market penetration in rail, mining, defence and marine. It is poised to act as a catalyst for diversification for the wider automotive industry, but will need to grow and improve efficiency and innovation to realise its full potential. While on the other hand the PMV OE segment which needs urgent access to diversification opportunities, can provide the much needed workforce skills, R&D capability, intellectual property, quality systems and knowledge of OEM product development and validation process, to help the aftermarket segment to overcome supply side constraints. Clearly then, policy settings which seek to maximise these synergies between the two sectors will produce win-win outcomes for the sustainability of the sector as a whole, and minimise the displacement of the workforce and other resources within the industry.

1. ATS Eligibility

1.4 Overview of Scheme

(1) To further the object set out in subsection 3 (1) of the Act, these Regulations prescribe the Scheme that replaces the ACIS from 1 January 2011.

(2) Under the Scheme, ATS participants are entitled to cash payments of assistance for eligible investment and eligible production.

(3) Part 2 provides that an applicant for registration under the Scheme must be engaged in production in Australia of one of the following:

(a) motor vehicles;
(b) engines or engine components;
(c) automotive components;
(d) automotive machine tools or automotive tooling;
(e) automotive services.

The principles of the Automotive Transformation Scheme (ATS) are sound but the continued use of a narrow eligibility criteria has cost the Australian community and has reduced the effectiveness of the Scheme as a means to achieve the intended outcomes.

The cost is in the missed opportunities to build upon the full breadth and complexity of automotive production: agriculture, mining vehicles, truck, bus, recreational vehicles, motorised personal vehicles, aftermarket, parts and accessories, performance enhancement, performance modification, aftermarket safety components, 4WD components and special purpose vehicles. Widening the eligibility for ATS by using a definition of 'Automotive' that embraces the full span of Australia's automotive industry is an opportunity to address the imminent decline in passenger car manufacturing activity and jobs.

There has always been a fundamental flaw in the scheme: the doorway to ATS is very narrow. Only a small (and shrinking) number of companies fit through that door. However, once admitted to the Scheme, the span of eligible activity is very broad.

We need to widen the eligibility doorway, because we need more economic activity in the broader automotive manufacturing sector. The eligible grant activity doesn't need to change – what is required is regulatory change to widen the door to encompass all Australian Automotive manufacturers – the innovative companies that include manufacturers of; heavy vehicles, speciality vehicles, motor racing components, 4WD safety and performance and replacement parts.

We are asking for a definition of 'Automotive' that is currently defined by the Customs Tariff Schedule (Appendix One).

Our contention that Section 17 - Schedule 3/Chapter 87 of the Customs Tariff is clearly intended to describe and cover the automotive industry: ALL of the (imported) automotive products referenced in this Schedule were subject to the same tariff phase down to the current level. However, despite the fact that the ATS (and many associated government programs) were designed to assist companies to restructure in the context of the tariff phase down, the current ATS eligibly takes a small number of the full list of automotive products (primarily 8702 and 8703) to define the eligible companies for ATS purposes.

To be eligible for ATS an automotive component producer must be, or will be, producing (producing defined as at least one substantial process which includes assembly) automotive components for fitment to vehicles produced by a motor vehicle producer for fitment to a new vehicle under 3.5 tonnes that *if imported* would be classified to a subheading 8702, 8703 (other than 8703.10.00) 8704.21 8704.31 or 8704.90 of schedule 3 of the customs tariff act.

The intent of this narrow and selective criteria was to specifically support the motor vehicle producers and their suppliers. However, given the economic weight of the recent decisions the net should now be broadened to include all Australian based automotive production. Not because these companies are under threat – but because these companies hold the greatest hope for absorbing the stranded assets and labour that will be created as the car companies exit the country.

The effectiveness of the ATS program is undermined by eligibly criteria that is now counterproductive to transitioning the industry to absorb excess capacity and jobs and is not responsive to the immediate imperative which is growing innovative companies in the shadow of the demise of local passenger motor vehicle production.

Once in the Scheme, the definition of Automotive becomes far broader and captures the production of components for vehicles (that if they were to be imported) would be captured by the full Chapter 87 of schedule 3 to the tariff, refer to section 1.7 of the regulations below.

1.17 Allowable plant and equipment

(1) An ATS participant may claim the following kinds of plant and equipment as allowable plant and equipment:

(a) plant and equipment for the manufacture, assembly, design, development or engineering of motor vehicles, engines, engine components, automotive components, automotive machine tools or automotive tooling;

(b) plant and equipment directly supporting the manufacture, assembly, design, development or engineering of motor vehicles, engines, engine components, automotive components, automotive machine tools or automotive tooling;

(c) plant and equipment required to comply with a law of the Commonwealth, a State or a Territory relating directly to the manufacture, assembly, design, development or engineering of motor vehicles, engines, engine components, automotive components, automotive machine tools or automotive tooling;

(d) plant and equipment for the activation of manufacturing processes for the production of motor vehicles, engines, engine components, automotive components, automotive machine tools or automotive tooling;

(e) plant and equipment facilitating the provision of automotive services or allowable research and development;

(f) plant and equipment indirectly supporting functions that are integral to the production of motor vehicles, engines, engine components, automotive components, automotive machine tools or automotive tooling.

Apparently, once you are in the program you are permitted to engage in activities and investment for the whole of the automotive industry – not just the small selective sections that are included in the ATS eligibility criteria.

Surely the companies that are already engaged in the full range of activities within section 1.7 above are also the very same companies that are likely to invest in these same activities. If the intent is to generate investment and jobs – why limit the number of companies that are to be included in the scheme by taking a narrow view of eligibility?

Therefore, it would be highly appropriate to use the tariff schedule to define the industry as this group of products have all been subject to exactly the same global pressures, for both eligibility criteria and eligible expenditure.

Recommendation 1.1:

Amend ATS eligibility to include the following: To meet eligibility an ACP must be (or will be) producing automotive components for fitment to vehicles that *if imported* would be classified to a subheading 8701, 8702, 8703, 8704, 8705, 8706, 8708, 8709, 8710, 8711, 8712, 8713, 8714, 8715 and 8716 of Schedule 3 of the Customs Tariff Act.

There are additional eligibility requirements that have the intent to limit the pool of companies that can apply. Additional requirements for application insist that the participant has sales of eligible product that exceeds $500,000 pa and be more than 30,000 units or that $500,000 is greater than 50% of total Automotive product (per the broader definition of Automotive). The $500k minimum is designed to exclude SMEs and maintaining this restriction will also be counterproductive in supporting innovation that will occur in the market place when the vehicle producers depart.

2.5 Application for ACP registration

(1) A person who is a producer of automotive components may apply to the Secretary for registration as an ACP if:

(a) in the 12 months preceding the application:

(i) the person produced in Australia at least one kind of automotive component for use as original equipment in at least 30 000 motor vehicles or in at least 30 000 engines and the production value of the component was at least $500 000; or

(ii) the production value of the automotive components produced by the person in Australia as original equipment was at least $500 000 and comprised at least 50% of the production value of all automotive components produced by the person; or

(b) if paragraph (a) does not apply — the person is able to demonstrate, to the satisfaction of the Secretary, that for the ATS year to which the application for registration relates:

(i) the person is likely to produce in Australia at least one kind of automotive component for use as original equipment in at least 30 000 motor vehicles or at least 30 000 engines and the production value of the component will be at least $500 000; or

(ii) the production value of the automotive components produced by the person in Australia as original equipment is likely to be at least $500 000 and to comprise at least 50% of the production value of all automotive components produced by the person; or

(c) if neither paragraph (a) nor (b) applies — the person has been given permission by the Minister, under regulation 2.8, to apply for registration as an ACP.

In addition to minimum quantities, the current scheme also requires that applicants are producers of 'original equipment'. This requirement limits the reach of the scheme and reduces the opportunity to support products that are often subject to the same manufacturing process. Generally it is understood that there are four sources of automotive parts:

1. Original Equipment Manufactured (OEM) Parts – these are usually manufactured by the car makers' parts suppliers. In addition to providing parts for the manufacture of the vehicle, these suppliers enter into an agreement to supply additional parts that are distributed by the car companies through their dealer networks as 'genuine' parts.
2. OEM supplier branded aftermarket parts – these are the same manufacturers as the 'genuine' parts (above) but the supplier uses their own company branding. Same part, same manufacturer, different box.
3. Independent Aftermarket Parts –replacement parts that are manufactured specifically for use after the car is built for local and export markets. They are quality, fit for purpose, interchangeable parts with the same functionality as the Original Equipment part but produced by a different manufacturer to the OEM supplier (above).
4. Specialist Parts & Modification and Performance Enhancement – parts and accessories that the car companies do not include in the original build and are added after purchase to modify the vehicle for its intended end use (bull bars, suspension lift kits, roof racks, tow bars etc.).

The issue here is not whether the parts were manufactured for use as 'original equipment', it is whether the part/s are for fitment to an automotive and whether the part is fit for the purpose intended.

If an independent (non-OE) part is interchangeable with the manufacturer branded part, it is deemed as being fit-for-purpose and does not therefore void the manufacturer's warranty. Also just as OEM parts do, these parts also come with Consumer Guarantees under the Australian Consumer Law.

Recommendation 1.2:

Remove reference to minimum sales values, minimum quantities and the term "original equipment".

2. A Fairer Contribution to Plant & Equipment Investment

The current program provides a 50% benefit for R&D and a 15% benefit for Plant and Equipment.

The determination of what is eligible plant & equipment (contained in sections 1.17 and 1.19 of the regulations) is appropriate, fair and equitable. The benefit receivable for plant and equipment investment is, however, capped at 15%, per section 2.43 of the ATS Order of 2010.

In the current climate, there should be a far greater emphasis on encouraging investment in plant & equipment (under the scheme the equipment must be located in Australia and we strongly agree with this approach). If the allowance was raised this would encourage domestic investment in productive assets.

Capital investment is the clearest evidence available to ascertain the level of on-shore commitment to local manufacturing. The decision to invest in plant and equipment is the signal to the market that the economic activity is to occur locally and jobs growth and job stability occurs as a direct result.

Whilst we see enormous value in supporting R&D, the fear that most in the community hold is that post 2017 the volume of local advanced manufacturing activity will decline. R&D investment is important for the long term future of all manufacturing industries, however it is the Investment in plant and equipment that represents the best opportunity to absorb labour. The benefit split between plan and equipment and R&D should be adjusted to increase the Plant and Equipment component to 50%.

Recommendation 2.1

That the rate of benefit allowable for investment in plant and equipment be raised to 50%.

3. Future Investment

There are a number of administrative arrangements within the ATS that are not conducive to future automotive investment and activity.

The range of projects that are currently under active consideration are, in the most part, ineligible for ATS. Projects that build on our strengths, absorb labour and capital should be the priority projects that are supported by the ATS.

If the ATS is examined from the lens of these new projects and opportunities it becomes clear that there are unnecessary hurdles and barriers that should be removed.

Areas that we have identified for reform include the following:

A. Eligibility of a Motor Vehicle Producer (MVP).

B. Minimum volumes.

C. The Arbitrary 55/45 Split.

D. The Sales Cap, and

E. The Annual registration process.

3A Eligibility of a Motor Vehicle Producer (MVP)

Eligibility of a Motor Vehicle Producer (MVP) is governed via section 1.6 of the regulations that requires colour coated painting in Australia or inserting of a crankshaft into an engine as an MVP.

1.6 Meaning of production of goods and provision of services in Australia
Production of engines
(3) Subject to subregulations (1) and (2), an engine is taken to have been produced in Australia if:
(a) the fitting of the crankshaft into the engine is carried out in Australia; and
(b) the engine has passed final quality control at the end of a production line in Australia.
Production of motor vehicles
(4) Subject to subregulations (1) and (2), a motor vehicle is taken to have been produced in Australia if the motor vehicle:
(a) has undergone a process of colour coated painting in Australia; and
(b) has passed final quality control at the end of a production line in Australia.

3B Minimum Volumes

Minimum volumes, as per regulation 2.4, are set at 30,000 per annum.

2.4 Application for MVP registration

(1) A person who is a motor vehicle producer may apply to the Secretary for registration as an MVP if:

(a) in the 12 months preceding that application, the person produced in Australia at least 30 000 motor vehicles or at least 30 000 engines; or

(b) if paragraph (a) does not apply — the person is able to demonstrate, to the satisfaction of the Secretary, that in the 12 months following the application, the person is likely to produce in Australia at least 30 000 motor vehicles or at least 30 000 engines; or

(c) if neither paragraph (a) nor (b) applies — the person has been given permission by the Minister, under regulation 2.8, to apply for registration as an MVP.

There are innovative projects in the market place and in the investment pipeline, including engineering and manufacturing activities to convert left hand to right hand drive vehicles. There are a number of projects for specialist and emergency vehicles all of which will be low volume and all of which would add to a critical mass for the automotive aftermarket. Each of these activities represents an opportunity for Australia to maintain and grow investment, infrastructure, skills and jobs in automotive manufacturing. The 30,000 threshold prevents the growth of these innovative programs that are likely to emerge as the vehicle producers leave the country.

Neither of these definitions are useful or relevant to assist us to meet the challenges that are presented by this period in our automotive manufacturing history.

Recommendation 3.1:

That the ATS program provide incentive for the establishment of CKD (complete knockdown) or outsourced assembly operations where volumes do not need to exceed 30,000 per annum. That the definition of an MVP is broadened and volume requirements are examined on a case by case basis for commercial viability rather than an arbitrary number.

3C The Arbitrary 55/45 Split

The program directs 55% of the benefits under the program to the MVPs with all other participants sharing in 45%. Post 2017 the MVPs will no longer qualify (Ford may qualify as a service provider) and the funds will not be distributed. There can be little doubt that the Government is expecting to take these funds back to revenue.

3.10 Capped assistance divided between MVPs and others

> **The ATS year cap for capped assistance for an ATS year set out in regulation 3.9 must be divided as follows:**
> **(a) MVPs — 55% of the ATS year cap;**
> **(b) ACPs, AMTPs and ASPs — 45% of the ATS year cap.**

The issue here is that there are some innovative projects that could provide unique opportunities for local production and export. Consistent with the consequences of a 'narrow doorway', the split of grant funds requires an arbitrary definition of where this innovative economic activity may sit.

There are early stage discussions of completing, adapting and assembling highly specialised low volume vehicles in Australia and these activities do not quite fit a neat delineation between 'vehicle producer' and 'component producer'. Effectively the guiding rule for grant approval should clearly be economic benefit and not a predetermined split of the funds – merit should be the deciding factor here.

Recommendation 3.2

That all ATS applications are judged on merit and that there be no arbitrary split between MVP and the rest of the automotive component and transport equipment participants.

3D The Sales Cap

The Sales Cap Is Not Supportive Of Capital Intensive Growth. The program sets a cap of benefit at 5% for an existing business and 15% for a start-up business. If a company enters into capital intensive activity it risks not getting the full benefits.

> **3.11 Sales-based cap for payment of assistance**
> **(1) For a particular ATS year, the payment of assistance under the Scheme to an ATS participant, other than during an eligible start-up period of the ATS participant, must not exceed 5% of the sales value of the ATS participant's goods and services for the previous year.**
> **(2) The payment of assistance to an ATS participant in an eligible start-up period must not exceed 15% of the eligible start-up investment amount of the ATS participant.**

Recommendation 3.3

That the sales cap be removed if a business exceeds its sales cap as a result of investment in plant & equipment.

3F Annual Registration Process

The program is open for applications once a year. The impact is businesses only have an annual opportunity to register and if they become eligible part way through a year they are forced to wait out the balance of the year. If an applicant gets their application wrong and wishes to resubmit they must wait a full year.

> **2.14 When to apply**
>
> **(1) A person may apply for registration before 1 January of the ATS year for which registration is sought.**
>
> **(2) The Secretary must not accept an application for registration for an ATS year after 1 January of that year.**
>
> **(3) For the avoidance of doubt, the persons to whom this regulation applies include a person who has been granted permission to apply for registration under regulation 2.8.**

The amount of time to transition our industry is limited – the withdrawal deadline is not far away and we are headed for some very difficult times – our contention is that the wait period is not necessary and carries an unacceptable opportunity cost.

Recommendation 3.4

That the program is open for quarterly registration in line with the original Automotive Competitiveness and Investment Scheme (ACIS).

Concluding Remarks

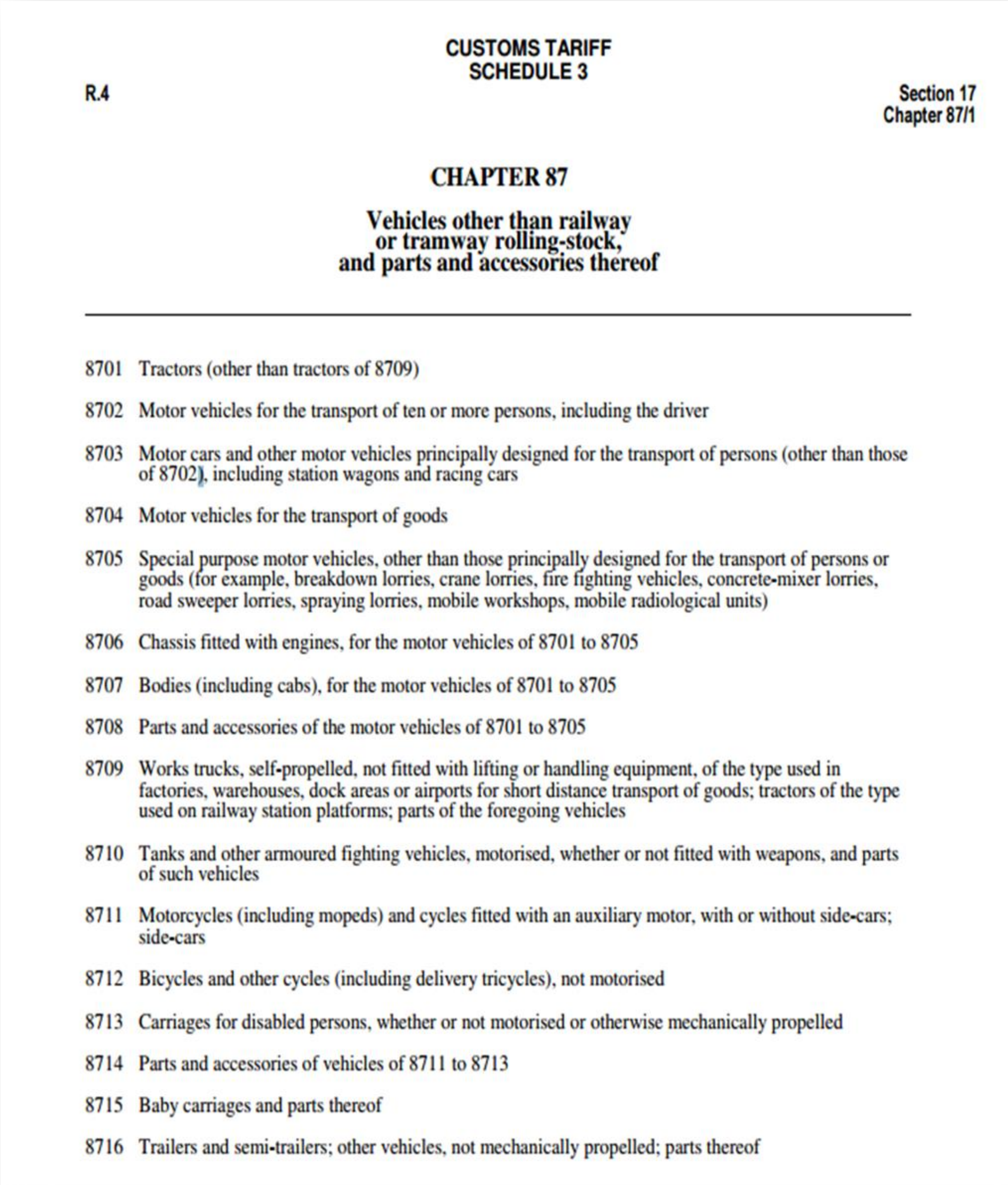
The ATS scheme as it currently designed does not meet the significant challenges of today nor tomorrow. Changes to the program should be built on the intended outcome – the ATS is a means to an end: maintaining and growing Australia's advanced manufacturing capability, investment and infrastructure. Even though the automotive aftermarket segment has reasonable profitability our industry is still critically aware of the need to further improve productivity, to invest in capital deepening, plant and equipment and to continue to innovate and undertake research and development to push production further up the value chain.

The centrepiece scheme to support investment and innovation of the automotive supply chain is the ATS. The Automotive Transformation Scheme in its current form was not designed to meet the challenges that we now face. The ATS was NOT designed with foreknowledge that in 2017 all of the vehicle manufacturers would have left the country.

Under the current legislation aftermarket competitors that find a way to slip through the narrow door gain a significant advantage over those that can quite get through the door. The doorway could be broadened to include original equipment for other vehicles (such as trucks and buses), removal of volume quotas or more inclusive of Aftermarket production. Opening the scheme comes with very little risk. The program has a cap on benefits to ensure that government doesn't need to deal with a blow-out of cost, and a mechanism to deal with over subscription.

Designing the right changes will provide economic stimulus to this industry. It is reasonable to take a look at the objectives of the program and have a rethink about how best to achieve these objectives – simple, logical changes could reposition the industry for growth and sustainability and lead to a program that is responsive to the challenges of this century and beyond.

Appendix One



CUSTOMS TARIFF
SCHEDULE 3

R.4

Section 17
Chapter 87/1

CHAPTER 87

Vehicles other than railway or tramway rolling-stock, and parts and accessories thereof

8701 Tractors (other than tractors of 8709)

8702 Motor vehicles for the transport of ten or more persons, including the driver

8703 Motor cars and other motor vehicles principally designed for the transport of persons (other than those of 8702), including station wagons and racing cars

8704 Motor vehicles for the transport of goods

8705 Special purpose motor vehicles, other than those principally designed for the transport of persons or goods (for example, breakdown lorries, crane lorries, fire fighting vehicles, concrete-mixer lorries, road sweeper lorries, spraying lorries, mobile workshops, mobile radiological units)

8706 Chassis fitted with engines, for the motor vehicles of 8701 to 8705

8707 Bodies (including cabs), for the motor vehicles of 8701 to 8705

8708 Parts and accessories of the motor vehicles of 8701 to 8705

8709 Works trucks, self-propelled, not fitted with lifting or handling equipment, of the type used in factories, warehouses, dock areas or airports for short distance transport of goods; tractors of the type used on railway station platforms; parts of the foregoing vehicles

8710 Tanks and other armoured fighting vehicles, motorised, whether or not fitted with weapons, and parts of such vehicles

8711 Motorcycles (including mopeds) and cycles fitted with an auxiliary motor, with or without side-cars; side-cars

8712 Bicycles and other cycles (including delivery tricycles), not motorised

8713 Carriages for disabled persons, whether or not motorised or otherwise mechanically propelled

8714 Parts and accessories of vehicles of 8711 to 8713

8715 Baby carriages and parts thereof

8716 Trailers and semi-trailers; other vehicles, not mechanically propelled; parts thereof

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