



The Parliament of the Commonwealth of Australia

REPORT ON THE PROVISIONS OF THE

**MOTOR VEHICLE STANDARDS
AMENDMENT BILL 2001**

**Report by the Senate Rural and Regional Affairs and
Transport Legislation Committee**

September 2001

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ISSN 1038 - 2755

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ABBREVIATIONS

AADA	Australian Automotive Dealers Association
AAIMA	Australian Auto Importers and Manufacturers Association
ADRs	Australian Design Rules
CPA	Compliance Plate Approval
DISR	Department of Industry, Science and Resources
DOTRS	Department of Transport and Regional Services
FCAI	Federal Chamber of Automotive Industries
FORS	Federal Office of Road Safety
LVS	Low Volume Scheme
MTAA	Motor Trades Association of Australia
MVSA	<i>Motor Vehicle Standards Act 1989</i>
RAWS	Registered Automotive Workshop Scheme
SEVS	Specialist and Enthusiast Vehicle Scheme
VICAA	Vehicle Importers and Converters Association
VIN	Vehicle Identification Number
VSS	Vehicle Safety Standards

CHAPTER ONE

THE COMMITTEE'S INQUIRY

Reference of the Bill to the Committee

1.1 On 29 August 2001 the Senate referred the Motor Vehicle Standards Amendment Bill 2001 to this Committee for examination and report on Tuesday, 25 September 2001.

1.2 The Committee has been asked to inquire and report on the following matters related to the Bill:

- a) Scrutiny of the draft Regulations;
- b) The impact on small business and local manufacturing industry.¹

Purposes of the Bill

1.3 The main purpose of the Bill is to amend the legislative framework to enable new arrangements for the importation and supply to the market in Australia of low volume road motor vehicles, including motor cycles, ie what are now termed specialist and enthusiast vehicles.

The Committee's Inquiry

1.4 On referral of the provisions of the Bill, the Committee received numerous representations from the automotive industry on the Bill and its impact on their businesses. The Committee received 50 written submissions on the Bill as at Monday, 24 September and a number of supplementary submissions. These submissions are listed at Appendix 1 of the report. Submissions continue to be received.

1.5 The Committee held public hearings on the Bill in Canberra on Thursday, 20 September 2001 and Monday, 24 September 2001. The witnesses who appeared at the hearing are listed at Appendix 2 of the report.

1.6 Published submissions and the *Hansard* of the Committee's hearing on the Bill are tabled with this report, together with supplementary material provided to it following the Committee's hearing. The *Hansard* of the hearing is available at the Hansard site on the Parliament House homepage on the Internet (www.aph.gov.au).

Consideration of the Committee's Report

1.7 The Committee met on Tuesday, 25 September to consider its report.

1 Selection of Bills Committee Report no 13 2001, 29 August 2001

Acknowledgments

1.8 The Committee acknowledges the assistance and contribution made to its inquiry by all those who prepared written submissions on this inquiry at short notice. The Committee also acknowledges the assistance provided at its public hearing on the Bill by all witnesses, and the prompt provision of supplementary information requested by the Committee. The Committee also acknowledges the assistance of the following:

- a) The Department of the Parliamentary Reporting Staff in providing the Hansard transcript of proceedings, again within a very short timeframe; and
- b) the Law and Bills Digest Group of the Parliamentary Library, which produces the Bills Digest report.

1.9 This assistance has allowed the Committee to prepare and present its report within a short period of time.

CHAPTER TWO

MAJOR ISSUES

2.1 The Bill is the result of the government's decision announced on 8 May 2000 following a review of the *Motor Vehicle Standards Act* 1989. In introducing the Bill, the Government advised:

The decisions aim to balance the government's commitment to the local automotive manufacturing industry, full volume importers, franchised motor vehicle dealers, importers and converters of used vehicles, and consumers of genuine specialist and enthusiast vehicles. The decisions include revised eligibility criteria for vehicles being imported under the low volume scheme and the establishment of a registered workshop arrangement for the importation and supply of used vehicles to the market. The registered workshop arrangement will operate on a cost recovery basis. It will improve consumer protection for purchasers of used imported vehicles.

2.2 The Government further stated:

The changes made by this bill are intended to return the low volume scheme to its original intent of catering for the importation of genuine specialist and enthusiast vehicles and to prevent unchecked growth in the importation of used vehicles that are very similar to vehicles already marketed in full volume.¹

The Bill and its Origins

2.3 The Bill amends the *Motor Vehicle Standards Act* 1989 to:

- allow for a register of specialist and enthusiast vehicles to be established which will be used to restrict the importation of used vehicles (except used motorcycles) to those assessed to be specialist and enthusiast and prevent the importation of what are, effectively, standard vehicles.
- introduce a scheme to regulate registered automotive workshops;
- require imported used vehicles to be modified and inspected by registered automotive workshops, on a vehicle by vehicle basis, to ensure each vehicle's compliance with the appropriate national standards – provides for vehicles to be modified and inspected and approved for plating on a vehicle by vehicle basis rather than on the basis of vehicle type;
- introduce a charging regime for registered automotive workshops that aims to recover the costs of administration of the scheme;
- limit the number of vehicles a registered automotive workshop may supply during a specified period;
- create various offence provisions;

1 The Hon John Anderson MP, Second Reading Speech, p 1

- replace the existing approvals to modify imported used vehicles with transitional approvals;
- provide for the transitional approvals to be in force, for a period to be set out in the regulations. The period of the transitional approvals will aim to achieve a smooth transition to the new arrangements.²

The Review Task Force

2.4 In 1997, the Government established an interdepartmental Task Force to conduct a review of the *Motor Vehicle Standards Act 1989*, the legislation which regulates motor vehicles to the point of first reply to the market in Australia. The background to the Bill and the findings of the Review are discussed in detail in the *Bills Digest*³ produced by the Parliamentary Library. It should be noted, however, that the Review findings and recommendations were not fully accepted by the Government and the amendments resulting from this Bill are different from the actions recommended by the Review Task Force.

2.5 The Government's announced its response to the Review of the *Motor Vehicle Standards Act 1989* on 8 May 2000. The two main changes to arrangements for importing used vehicles related to:

- a) The introduction of a Specialist and Enthusiast Vehicle Scheme [SEVS]. This would effectively restrict the importation of used vehicles to those which meet a specific set of criteria (which aim to define vehicles which are vehicles of interest to the genuine enthusiast).
- b) The introduction of a vehicle-by-vehicle inspection scheme (to replace the current 'type' approval system). It is proposed that all approvals be conducted through a Registered Automotive Workshop Scheme [RAWS].

Specialist and Enthusiast Vehicle Scheme [SEVS]

2.6 The Review noted that the two main regulatory influences on the number of vehicles being imported under the Low Volume Scheme [LVS] were:

- the eligibility criteria; and
- the number of Compliance Plate Approvals [CPA's] issued (and the limit on the number of vehicles that can be imported under each CPA).⁴

2.7 A number of submissions to the Review argued that there had been several changes made to the eligibility criteria over the years, resulting in a departure from the 'original intent' of the LVS. The Review noted that there was considerable disagreement amongst stakeholders about what the original intent actually was. In addition, it found that the LVS

2 Explanatory Memorandum, Motor Vehicle Standards Amendment Bill 2001

3 Dept of the Parliamentary Library, *Bills Digest* No. 25, 2001-02 (www.aph.gov.au/library/pubs/bd/)

4 Department of Transport and Regional Services, *Review of the Motor Vehicle Standards Act 1989*, August 1999, pp 89-95; Department of the Parliamentary Library, *Bills Digest* No. 25, 2001-02, p 3

criteria were particularly subjective, resulting in decision-making regarding eligibility being very time consuming.⁵

2.8 In recommending a revision of the criteria, the following options were put forward for consideration:

- Option 1 - limit the number of models by tightening up eligibility criteria to ensure only "specialist and enthusiast" vehicles are eligible
- Option 2 - retain the current criteria with clearer working guidelines, or
- Option 3 - expand the scope of the scheme through having the single criterion that the vehicle models not be already in the Australian market in full volume.

2.9 The Committee notes that the Task Force did not consider Option 1 appropriate, concluding that it "would have an adverse impact on the viability of small business and would reduce consumer choice". The Task Force also indicated that it did "not see any positive benefits for restricting the vehicles to enthusiast vehicles".⁶

2.10 The Task Force's preferred option was Option 2 with the provision that the amendments or guidelines were developed to make the criteria less subjective.⁷

2.11 The Government released its response to the Review on 8 May 2000, and announced that Option 1 was the preferred option. Option 2 was not considered feasible based on the argument that there had been a rapid increase in the number of imported vehicles and that a number of stakeholders had argued that the LVS was a concessional scheme and that it should return to its original intent.⁸ The Government also announced its decision to change the name of the Low Volume Scheme to the Specialist and Enthusiast Vehicle Scheme (SEVS).

Type Approval

2.12 The current approval system for supplying used vehicles to the market is a 'type' approval system. Approval is granted on the basis of a single test and evaluation vehicle and once an approval is granted it is up to the approval holder to demonstrate that all vehicles are the 'same' as the test vehicle.

2.13 The Review Task Force argued that because of the lack of uniformity in used cars, an individual test vehicle is not necessarily representative of all vehicles of that model. The

5 Department of Transport and Regional Services, *Review of the Motor Vehicle Standards Act 1989*, August 1999, pp 89-90

6 Department of Transport and Regional Services, *Review of the Motor Vehicle Standards Act 1989*, August 1999, p 89

7 Department of Transport and Regional Services, *Review of the Motor Vehicle Standards Act 1989*, August 1999, p 91

8 *Motor Vehicle Standards Amendment Bill 2001*, Explanatory Memorandum, p 13

Review also suggested that the current system posed problems in relation to the regulation of safety and emission standards.⁹

Registered Automotive Workshop Scheme [RAWS]

2.14 The Review recommended that the current system be replaced with vehicle-by-vehicle approval using a system of registered workshops. This recommendation for a registered workshop system, which was accepted by the Government, was based on the following arguments:

- the potential for development of co-regulation with industry
- the workshops will provide a higher level of assurance that the vehicles comply with the Australian Design Rules
- the workshops can provide a network of service and spare parts
- the workshops may be held responsible to conduct vehicle safety recalls, and
- it would restrict the Scheme to legitimate vehicle converters.¹⁰

Views of Stakeholders

2.15 The Committee notes that the views of stakeholders are polarised regarding the proposed amendments to the Act.

Vehicle Manufacturing and Automotive Industries

2.16 Representatives of the vehicle manufacturing industry and the automotive industry argued very strongly for the immediate passage of the Bill. The manufacturing and automotive industries were united in their views and argued that imported used vehicles being imported under the LVS pose a serious threat to Australia's automotive and manufacturing industries.

2.17 The Motor Trades Association of Australia [MTAA] argued that if the current Low Vehicle Scheme continues, Australian businesses and jobs will be under threat. The Association also argued, that without the new regulations:

... the Australian market would inevitably be flooded with second-hand Japanese cars which would destroy Australian manufacturing operations and scare off future investment in automotive manufacturing (as has occurred in New Zealand).¹¹

2.18 The MTAA argued that allowing the current LVS to continue would force new car dealers to commence importing used vehicles in order to compete. Mr Michael Delaney, Executive Director of the MTAA, indicated that there were a large number of dealers who hold new vehicle franchises who are not currently in the business of importing vehicles but

9 Department of the Parliamentary Library, *Bills Digest* No. 25, 2001-02, p 5

10 Department of the Parliamentary Library, *Bills Digest* No. 25, 2001-02, p 5

11 Submission No. 4, Motor Trades Association of Australia, Attachment, p. 2

who have indicated they will enter the business if the legislation is not passed. Mr Delaney predicted that this could result in a huge increase in vehicles imported under the LVS:

They are fully capitalised, unlike the small operators who are presently there, and they would be in a position through their capital, their outlets, their expertise and their long standing in the business to import both new vehicles, which might be able to be imported whatever franchisors might wish under copyright arrangements, and used vehicles to a volume that is easily arrived at by saying, 'For permits by 1,500 dealers gets you readily to about 150,000'.¹²

2.19 In evidence provided at the Committee's 20 September 2001 hearing, Mr Peter Sturrock, Chief Executive of the Federal Chamber of Automotive Industries [FCAI] indicated that the Chamber was in agreement with the proposition put forward by the MTAA:

It is quite realistic. If they [franchised motor dealers] are given the green signal to proceed they will move into that area -- I am talking about the large operators with the capacity, both management skill and financial acumen so to do. There is no question about that.¹³

2.20 In addition to the arguments regarding the threat posed by the LVS to the automotive manufacturing industry, this section of the industry also argued that there are significant consumer and motorist safety problems in relation to imported used vehicles including:

- imported vehicles which are not designed for Australian conditions;
- the lack of a system to carry out safety recalls;
- vehicles not meeting Australian Design Rules; and
- parts and service back-up not being readily available.¹⁴

Opposition to the Legislation

2.21 The Committee received a considerable number of submissions and heard evidence from a number of individuals, associations and groups who are opposed to the proposed amendments to the Act.

2.22 Both the Vehicle Importers and Converters Association of Australia [VICAA] and the Australian Auto Importers and Converters Association [AAIMA] gave 'in principle' support to the introduction of a registered workshop scheme, however it was argued that under the proposed arrangements small businesses would be required to obtain ISO 9001 accreditation in addition to obtaining RAWS accreditation.¹⁵

12 Evidence, RRAT, 20 September 2001, p 21

13 Evidence, RRAT, 20 September 2001, p 34

14 Submission No. 4, Motor Trades Association of Australia, Attachment, p. 2; Submission No. 30, Federal Chamber of Automotive Industries; Submission No. 41, Victorian Automobile Chamber of Commerce; Submission No. 10, Toyota Motor Corporation of Australia Limited.

15 Submission No 34, Vehicle Importers and Converters Association of Australia [VICAA]

2.23 It was argued by both VICAA and AAIMA that the current proposal will be both time consuming and administratively onerous for both regulators and industry. The Committee also received considerable evidence regarding the excessive administrative burden the new legislation will impose on vehicle importers and converters. It was also argued that introduction of the proposed amendments will place a severe financial burden on those moving to the proposed RAWs and that the cost of transferring to the new scheme will effectively destroy the Low Volume industry.¹⁶

2.24 In evidence provided to the Committee at a hearing on 20 September 2001, Mr Gary Blogg, National Vice President of AAIMA stated:

Our position is that we support the introduction of a registered workshop scheme, with some amendments to the regulation. The problem we have is that the additional costs and the much higher burden with ISO accreditation, the increased level of evidence, is not going to be supported by the very restricted models that have financial viability under the new specialist and enthusiast vehicle regime..

2.25 In addition to the arguments raised in relation to the increased administrative burden and financial costs, the owners and operators of vehicle import and conversion businesses also raised the following issues:

- a) A significant number of the turbo-diesel sedans imported from Japan under the current LVS are sold to farmers and rural transport owners because they are economical to run.¹⁷
- b) Under the new arrangements diesel and turbo engines will not be considered specialist and enthusiast vehicles, yet they were allowed under the original intent because it was recognised that the mainstream industry did not cater for this market as it was too small.
- c) An increase in the annual cap from 25 to 100 used vehicles per approval holder is not necessarily helpful to small business owners, particularly when you consider that the majority of small businesses only have the capacity to convert a small number of vehicles per year. Even if some businesses have the authority to process 100 vehicles, some will only be able to manage 10-12 per year.¹⁸
- d) The current number of used car imports (approximately 16,500) has allowed for people to set up businesses specialising in the supply of spare parts. If that number is reduced to two or three thousand cars, that volume will not be able to support viable spare parts operations.¹⁹

16 Submission No 34, Vehicle Importers and Converters Association of Australia [VICAA]; Submission No. 38, Australian Auto Importers and Manufacturers Association [AAIMA];

17 Submission No 1, Trucks Plus [Mr Brian Lynch]

18 Submission No 7, Lone Star Vehicle Imports [Mr Steve Kranz]; Evidence RRAT, 24 September 2001, p. 51

19 Evidence, RRAT, 20 September 2001, p 38

Impacts on Small Business

2.26 The Government's Review of the *Motor Vehicle Standards Act 1989* indicated that there were approximately 1,210 individual businesses directly involved in the Low Volume Scheme. The Explanatory Memorandum states that an additional 943 individual businesses had applied for plates under the LVS in 2000.²⁰

2.27 According to the Explanatory Memorandum many of the businesses involved in the Low Volume Scheme:

"... do not solely rely on used import activities and LVS businesses also have the capacity to switch to other vehicle types".

2.28 It is estimated that approximately 400 individual businesses will be affected by the tightening of the eligibility criteria. The Explanatory Memorandum notes that importers of used 4WD vehicles will be adversely affected by the new eligibility criteria. It is also argued that smaller businesses involved in the Low Volume trade will benefit from an increase in the annual cap from 25 to 100 used passenger motor vehicles per approval holder - a move intended to improve the viability of firms currently constrained by the 25 car limit.

2.29 This argument was disputed however, by the operators of some small businesses. Mr Steve Kranz provided evidence at the Committee's 24 September hearing which indicated that he was one of a number of businesses that had neither the capacity nor the interest in increasing the size of their businesses.²¹

2.30 The Department of Transport and Regional Services was unable to provide the Committee with information regarding the value of the Low Volume vehicle industry to the economy. The Department was also unable to provide definitive figures on the numbers of businesses that may be forced to close down as a result of the changes to the legislation.

Low Volume Scheme Operators

2.31 The Committee received evidence from a number of owners of small businesses currently operating under the Low Volume Scheme. There were various estimates regarding the number of businesses facing closure of the Bill and accompanying Regulations were passed.

2.32 In evidence provided at the Committee's 20 September 2001 hearing, Mrs Audrey Petersen, a licensed motor dealer and Compliance Plate Approval holder from Queensland, indicated that the proposed new arrangements were already having an impact on the Low Volume industry.

In the Motor Vehicle Standards Act reform, the task force recommended on page 89 that, if they brought in the SEVS and RAWS that they had nominated, it would be totally unacceptable for small business: they simply would not survive. And that

20 Department of Transport and Regional Services, *Review of the Motor Vehicle Standards Act 1989*, August 1999; *Motor Vehicle Standards Amendment Bill 2001*, Explanatory Memorandum, p 12

21 Submission No. 7, Lone Star Vehicle Imports, [Mr Steve Kranz]; Evidence RRAT, 24 September 2001, p 51

is precisely what has happened. If you go through the industry now, you will see that people are terrified of what might happen.²²

2.33 The Secretary VICAA, Mr Jack Vanstone, also indicated that the impending changes to the Act had had a considerable impact on members of the Low Volume industry:

... It is VICAA's view that both of the ministers have provided a clear path for small business in the announcement; however after 16 months of a two-year transition period, genuine operators have no clear direction or details. The impact of the announcement of 8 May has been, for genuine operators, mostly closure - if not, only survival. VICCA's membership has been impacted dramatically. Prior to the announcement we had 300 members; today we have 50 survivors.²³

2.34 AAIMA also raised the issue of the number of small businesses which exist as a result of the Low Volume industry and argued that the current level of vehicles imported under the LVS has had no impact on the Australian manufacturing and automotive industries. Mr Gary Blogg, AAIMA's National Vice President, suggested that the current level of imports under the LVS has created a demand and provided opportunities for the development of small businesses which provide spare parts. Mr Blogg argued that a large drop in the level of imports under the LVS would mean that there would no longer be the volume of vehicles to support viable spare parts operations.²⁴

Vehicle Manufacturing and Automotive Industries

2.35 Based on its primary argument regarding the current Low Volume Scheme posing a threat to the viability of the Australian manufacturing and automotive industry, this section of the industry argued that it was concerned about the impacts on small business if the Bill was not passed.

2.36 Mr Russell Scoular, a representative of the Ford Motor Company of Australia, advised the Committee that the company spends more than \$1.12 billion annually in local component purchases. Mr Scoular expanded on the nature of this expenditure and summarised the company's concerns by saying:

Many of these components are made by small to medium businesses and are sourced from regional centres - for example Empire Rubber in Bendigo, ACL Bearings in Launceston, EGR Plastics in Brisbane, While & Sons in Riverwood and BTR in Albury. Furthermore, the company's vehicles are distributed through a national network of 240 dealers employing some 11,000 people. The majority of these dealerships are independently owned, with many making major contributions to the commercial infrastructure of regional and rural centres throughout Australia. A number are also second and third generation family businesses.

.... The suppliers and dealers I have mentioned are just a mere sample of the many hundreds of businesses throughout Australia whose livelihood is dependent on a strong and viable automotive manufacturing company and industry.²⁵

22 Evidence, RRAT 20 September 2001, p 3

23 Evidence, RRAT 24 September 2001, p 44

24 Evidence, RRAT 20 September 2001, p 38

25 Evidence, RRAT 20 September 2001, p 14

Significance of the quantum of imports of SEV's

2.37 The major argument advanced by the supporters of the Bill about the implications of used vehicle imports is the growth in the quantum of imports. The figures showing the growth in imports since 1993 are at Table 2.1.

Table 2.1 – Used Vehicle Imports – 1993 – 2000

Year	1993	1994	1995	1996	1997	1998	1999	2000
Passenger Motor Vehicles Number <i>Growth year-on-year</i>	992	1,250 26%	1,556 24%	2,535 63%	3,181 25%	4,551 43%	8,000 76%	10,094 26%
Four Wheel Drives (eg Toyota Surf, Nissan Terrano) Number <i>Growth year-on-year</i>	3	3 0%	22 633%	88 300%	1,435 1530%	2,368 65%	5,500 132%	5,705 3%
Light Commercial Vehicles (eg Ute equivalents) Number <i>Growth year-on-year</i>	35	55 57%	91 65%	203 123%	302 49%	727 141%	880 21%	981 11%
Heavy Commercial Vehicles (eg Trucks and Buses) Number <i>Growth year-on-year</i>	7	10 43%	36 260%	47 31%	131 178%	62 -53%	120 94%	45 -63%
Total Number <i>Growth year-on-year</i>	1,037	1,318 27%	1,705 29%	2,873 69%	5,049 76%	7,708 53%	14,500 88%	16,825 16%

Source: 1993 to 1998 - Review of the Motor Vehicle Act 1989 Report; 1999 and 2000 - Rounded figures by Department of Transport and Regional Services

2.38 The major car manufacturing companies in particular assert that continued exponential growth of used car imports in the order of that over the last few years is potentially damaging to the domestic industry and that current large scale dealers will enter the market if the legislation is not passed. Such an action would of itself have the most serious consequences for the domestic manufacturing industry:

So we have a situation where, I guess, we are putting to the parliament that it has a very simple choice: it can either regularise and achieve the original intentions of 1989 or fail to pass the amendments and let the future prospects, we would think, occur. Lest that sound a bit difficult, I can only say that our instructions are that that is what they intend to do, because their view of the growth is that it has been of such an order and such a challenge to them—and certainly such a challenge to their suppliers and has impacted them in other ways in their business—that they really would not have any choice. In effect, it would not matter whether the parallels were with New Zealand as an assembly nation or Australia as a manufacturing nation, if something like the volume of 150,000-odd units were to be taken out of the local equation they think it would produce circumstances where, to protect their brands and franchises, they would have to engage in the trade. They think that, for those who are concerned over the present operators—and we certainly are as well; we think those who are quite legitimate and abiding by the spirit of the scheme are enhanced through the amendments rather than disadvantaged—it would not matter whether they were operating fairly, how they were capitalised or what fairness questions arose, because they would be wiped out by the big dealers going into the business. They would have no impediment, no incapacity, no capital shortage or skill shortage that would get in the way of what they might want to do.²⁶

2.39 Mr Sturrock from the Federal Chamber of Automotive Industries went on to say:

It is important to acknowledge that manufacturers, and indeed all full volume brands, are required to undertake a considerable investment to ensure their vehicles fully comply with all the relevant standards for safety and emissions. The very rapid growth in mainstream imports of used vehicles under the previous low volume scheme in these recent years poses a threat to that investment and exploits the loophole in existing legislation to gain what we believe is an unfair competitive advantage.²⁷

2.40 However, the AAIMA refuted the position put by the FCAI and MTAA, stating:

Mr Blogg ...Could I address the claims by both the FCAI and MTAA that there are large dealers out there waiting. It is just a joke. With all due respect to the gentlemen, because I am sure that they all mean well, it does not matter whether they are a franchised dealer or how much money they have, the current regulations say they can do 25 a year. There has been evidence of multiple applications, multiple workshops, and so forth to circumvent the scheme.

CHAIR—Twenty-five a year or 25 a month?

Mr Blogg—Twenty-five a year, 25 vehicles per category—the current low volume scheme. If these guys have the resources and they had a mind to do what they say they wanted to do, they would have already done it, because at the moment it is

26 Evidence, RRAT, 20 September 2001, p 21

27 Evidence, RRAT, 20 September 2001, p 30

cheap. It is \$500 to put it in. For getting the approvals, the level of evidence under the current scheme is of a lower standard than the new scheme—and they have not done it. They have not done it because they are not going to sell any volume of these cars. The cars are not the sort of cars that they sell in volume. These guys are about selling volume cars. They specialise in selling cars on finance. Our cars are a niche market. That is why they have not done it.

Under the new regulations, sure, they can do 100. Some of the dealers that they mention sell 15,000 to 20,000 used vehicles a year. This is single dealerships we are talking about—one dealer selling more used vehicles than the whole low volume scheme Australia wide. So why would they bother getting into a scheme where they could do 100? Even if they got around the new regulations and had two or three or four workshops, 300 or 400 cars a year, and jumped through all of the ISO and all of the audits, with all due respect, it is a joke. I cannot see it happening.²⁸

2.41 At present, figures provided to the Committee indicate that something in the order of 16,000 used vehicles are being imported into Australia. This figure represents only a very small percentage of the number of new vehicles imported annually and total annual vehicles sales. Those figures are shown at Table 2.2. However, the representative from the Department of Industry, Science and Resources stated:

How important are 16,000 vehicle sales to Australian industry? The loss of this sort of volume is important to Australian producers. Sixteen thousand new sales would represent around a 40 per cent increase in production of Magna Verada and an almost doubling of Toyota Avalon volumes. In Australia's small market, the break-even production volume is often quite finely balanced and extremely sensitive to small changes. Five thousand units either way can make an enormous difference to the viability of the local manufacturing operation. You have only got to see the oscillation of the profitability of Ford and Holden over decades to see that those marginal changes in market share have an impact on viability.²⁹

Table 2.2 – Comparative Annual Import and Sales Figures

Year	New CPU PMV's³⁰	Other new vehicles	Total New Vehicles	Imported used vehicles	% of used vehicles imports to new vehicles
1996	243 847	141 808	385 655	2 873	0.75%
1997	281 265	168 837	450 102	5 049	1.12%
1998	316 704	213 782	530 486	7 708	1.45%
1999	288 176	231 596	519 772	14 500	2.78%
2000	319 471	234 083	553 554	16 825	3.04%

28 Evidence, RRAT, 20 September 2001, pp 40-41

29 Evidence, RRAT, 24 September 2001, p 72

30 CPU PMV's means completely built up [ie assembled] passenger motor vehicles imported

2.42 The figures in Table 2.2 show a very small percentage of the imported vehicle market being used vehicles. The used vehicle market is a smaller percentage of the total domestic market, probably a maximum of 2%. Further, opponents of the legislation argue that the increase over the last few years has now slowed and that the market is at saturation point:

...in terms of the specialist and enthusiast vehicles, it is important to highlight this issue of numbers. Yes, there were some 16,000 vehicles imported last year in—I will continue to use the old terminology—the low volume area, as it has been called. It must be kept in mind by the committee that, while 16,000 were imported—and, yes, that was an increase on the figures three and four years before—three things are very important there. First, the structure of the approval regime to import vehicles could have allowed 40,000 imports. The reason 40,000 imports did not happen in Australia is quite simply that the market is controlling the numbers, so the opportunity to import an extra 24,000 vehicles, which was quite legitimately possible under the government scheme, did not happen. The only reason it did not happen was quite simply that the dealers could not sell that many vehicles.³¹

2.43 AAIMA is of the view that the market will slow down in any case through a combination of factors – the substantial increase in the cost of gaining new approvals³², the combination of the lower dollar and the recession in Japan, which has meant fewer cars available for import at higher costs.³³

2.44 Both VICAA and AAIMA argued that the markets supplied by their members and those supplied by the major manufacturers and importers are different markets. AAIMA considers that there are in effect three sectors in the domestic market – new vehicles, used vehicles and imported used vehicles³⁴ and VICAA state:

Australian motorists who wish to own a typical low volume car like a Transam or a dual wheeled, dual cab pick-up are not even interested in a conventional means of transport, and I would imagine that the senators would know why. The answer again is simple: they already own a conventional car, and the other car is their second choice. Most of these motorists who are our customers are unique in themselves—they choose a second mode of transport because it is something different, it is unique, it has special features.³⁵

31 Evidence, RRAT, 20 September 2001, p 35

32 Evidence, RRAT, 20 September 2001, p 39

33 AAIMA, supplementary information, 22 September 2001

34 Evidence, RRAT, 20 September 2001, p 39

35 Evidence, RRAT, 24 September 2001, p 44

CHAPTER THREE

THE REGULATIONS

Introduction

3.1 The draft Regulations were provided to the Committee on Monday, 17 September. The major issues raised in the Regulations were:

- a) Clauses governing eligibility criteria for approval to import;
- b) Clauses governing eligibility criteria for RAW approval [Clause 13R];
- c) The review procedures; and
- d) The transitional arrangements.

Eligibility Criteria for the Specialist and Enthusiast Vehicle Scheme [SEVS]

3.2 Eligibility criteria are set out in Part 4 of the Regulations. Vehicles can only be approved on an individual basis and not by type. While the regulations contain a list of approved types at Schedule 4, Registered Automotive Workshops must still submit an application for approval for individual vehicles.

Individual vehicle approval

3.3 The matter of vehicle by vehicle approval, as opposed to type approval, is of significant concern to the importers and converters in the industry, with organisations arguing that vehicle by vehicle approval is not economically feasible for prospective RAW's, placing 'a tremendous paper and financial burden on small businesses'¹. The Vehicle Importers and Converters Association of Australia [VICAA] argues that the Register of SEV's eliminates 30% of current low volume imports and destroys 90% of current low volume businesses.²

The eligibility criteria

3.4 The Australian Auto Importers and Manufacturers Association [AAIMA] argues that the eligibility criteria are 'unnecessarily restrictive and capable of highly subjective interpretation'. VICAA is fundamentally opposed to the current Register, arguing that the current eligibility criteria are unacceptable, and that 'the only criteria which should apply should be that the vehicle is not available through Full Volume importations'³.

3.5 In response to the Committee's request, the AAIMA suggested a number of amendments to the draft regulations to enhance their effectiveness. At public hearing on 24 September, VICAA and Mr Bill Cuthbert agreed with the general thrust of the amendment as suggested by AAIMA.

1 Supplementary submission, VICAA, 24 September 2001, p 2

2 Supplementary submission, VICAA, 24 September 2001, p 2

3 Supplementary submission, VICAA, 24 September 2001, p 3

3.6 AAIMA recommended that, instead of the current eligibility criteria proposed under Regulation 13B(4)(c) for inclusion on the SEVS register, the regulation be redrafted as follows:

Redraft [Regulation 13B(4)(c)] to read (by replacing (i) and (ii)):

“if the vehicle is in the MA, MB, MC, MD1, MD2 or NA vehicle category, being any vehicle model not offered to the Australian Market in Full Volume.”

(Note, this amendment would also provide for the deletion of Schedule 4 at page 46).

3.7 AAIMA argues that the advantages of adopting this recommendation are:

a) The FCAI, MTAA and AADA concerns, with regard to import numbers growth, are addressed, with the Australian market opportunities remaining limited to a niche section of the market;

b) It specifically excludes any model, or variant of that model, sold new as full volume in Australia. This means it excludes a number of vehicle models currently imported under the existing scheme, eg. turbo diesel Surfs, Terranos, MUs and Prados in the 4WD category and turbo and twin turbo Nissan 300ZX coupes (in the MA passenger vehicle category);

c) There is no subjectivity in assessment, all judgements being based purely on historic fact; and

d) The information to make the assessment is readily obtainable for both the Department and the industry.⁴

3.8 The AAIMA further argues that the adoption of the revised regulation may also have the advantage of allowing the Minister to divorce him or herself from the decision making process by allowing the Review Panel to assess the historic market evidence and present the Minister with a definitive and objective analysis of the facts, on which the Minister could base a decision.⁵

3.9 The Committee considers that, with limitations placed on the number of Compliance Plate Approvals [CPA's], such an amendment would allow for the importation of specialist vehicles, with appropriate limitations on quantity. Such an outcome accords with the views of the Review Task Force as discussed in Chapter 2.

Clause 13G – Review of Decision under Part 4

3.10 Clause 13G currently allows a person to apply to the Minister for a review of a decision to refuse to enter a vehicle on the register. Vehicles are entered on the SEVS Register either by the Minister or through an application to the Minister, who is the decision maker.

4 Supplementary submission, 22 September 2001

5 Supplementary submission, 22 September 2001

3.11 The regulations provide for the following review mechanism:

- a) Before reviewing the decision the Minister may refer the application to a Review Panel;
- b) The Minister must give the applicant a reasonable opportunity to make representations about the decision;
- c) The Minister must take into account any recommendation of the Review Panel and any representations by the applicant;
- d) The Minister must either confirm the decision or revoke the decision and enter the vehicle on the register.
- e) There is no appeal from the Minister's decision.

3.12 The difficulty is that essentially the Minister is reviewing his or her own decision. There is no provision in the Regulations for vehicles to be approved for inclusion on the Register by the Department or an officer of the Department – it is ministerial decision and ministerial review.

The Schedule of Approved Model Types

3.13 A schedule to the regulations lists 125 approved models, by type and year of manufacture which are eligible to be brought in under the Scheme:

- a) The Federal Chamber of Automotive Industries argues that that schedule 'provides a very comprehensive list'⁶;
- b) However, other organisations argue that the list is far too restrictive and that only a very small number of vehicles contained on the list would be viable⁷;

3.14 In particular, AAIMA states:

The problem we have is that the additional costs and the much higher burden with ISO accreditation, the increased level of evidence, is not going to be supported by the very restricted models that have financial viability under the new specialist and enthusiast vehicle regime. There is a list of 122 vehicles. If it is gone through and analysed, there are probably five or six cars—Japanese cars—that would have some limited viability. They are all high performance, two-door sports cars. It will be decimation for a lot of businesses around Australia. The costs and imposts of the registered workshop scheme cannot be supported, given the models available under the new regime.⁸

3.15 While the list appears to contain a large number of vehicles, both the AAIMA representatives and VICAA argue that many are not viable, with AAIMA stating at public

6 Evidence, RRAT, 20 September 2001, p 32

7 Evidence, RRAT, 20 September 2001, p 38

8 Evidence, RRAT, 20 September 2001, p 39

hearing only about 5 types, all late model Japanese sports cars, would be viable.⁹ A supplementary submission was received from AAIMA on 22 September, which expressed the following concern:

The list of vehicles provided in the draft regulations, at Schedule 4, share one of two characteristics:

- ◆ The wholesale prices are now prohibitive in terms of providing stock for Australian importers/retailers; and/or
- ◆ The vehicles are simply not available for sale, as the Japanese motorist delays the purchase of a new vehicle.

The Committee will recall Mr Gary Blogg indicated, at the Thursday night hearing, on information AAIMA had at the time that, of the 120+ models listed in the regulations, only five offered commercial opportunity for Australian importers. Mr Hubbard's report indicates that none of these five models could now be so characterised with any confidence.¹⁰

As a consequence, AAIMA wishes to indicate to the Committee that, unless there are appropriate amendments to the regulations, the Parliament can be assured that the regime proposed in the existing Bill and draft regulations will totally annihilate the current industry.¹¹

Registered Automotive Workshop Scheme [RAWS]

3.16 Requirements for registration as a Registered Automotive Workshop are set out in Part 5 of the Draft Regulations. A number of individuals and organisations expressed concern about the Registered Automotive Workshop Scheme. The requirement for dual approval, ie via ISO 9001 and departmental approval was criticised, as was the cost of compliance.

3.17 VICAA argues that the RAW scheme requirements are excessive and suggested that RAW status should only require:

- Registration with an ISO certification body;
- An initial inspection by that body to confirm that the workshop has the capacity to become a RAW;
- Proof of commercial/industrial zoning.¹²

3.18 Clause 13R sets out the requirements for approval as a registered automotive workshop [RAW]. In particular, clauses 13R (4)(c) – (f) require details of:

- a) the applicant's corporate structure [13R (4)(c)];

9 Evidence, RRAT, 20 September 2001, p 39 and supplementary submission, VICAA, p 4

10 AAIMA, supplementary information, 22 September 2001

11 AAIMA, supplementary information, 22 September 2001

12 Supplementary submission, VICAA, 24 September 2001, p 3

- b) names of persons having key personnel functions in the applicant's organisation [13R (4)(d)];
- c) the names of other officers or shareholders of the applicant who are in a position to influence the management of the applicant [13R (4)(e)]; and
- d) the name, trading name, address and ACN of any corporation, partnership or individual having a legal or beneficial interest in the applicant [13R (4)(f)].¹³

3.19 The AAIMA representative stated:

The second aspect of that regulation that I would like to draw to the attention of the committee is clause 13R(4)(c)—the issue of applications for approval. There is mention of other officers who are in a position to influence the management of the applicant. We appreciate the concern to make sure that legitimate, honest, reputable people are involved in our industry. Both our associations are dedicated to, frankly, discouraging out of the industry those who do not fall into that category. However, the attempt in the regulations to weed out people who are not regarded as satisfactory becomes particularly onerous when we talk about other officers without a definition of what those officers are.¹⁴

3.20 In a supplementary submission to the Committee, the AAIMA argued that Draft Regulation 13R (4)(e) be deleted.

3.21 AAIMA also expressed concern about regulation 13S, and the requirement that an applicant for an RAW cannot be an associate of another RAW:

I merely say that we face a significant problem. As with many areas of the Australian automobile industry, the opportunity for people with the talent, ability and education—which is prescribed elsewhere in the regulations—is not such as to provide thousands of people who might be able to sign off on these inspections. I urge the committee to seriously consider a regulatory change in what is proposed to maintain the integrity of not having dishonest people exploiting loopholes to get influence through two or three registered workshops. However, at the same time, it should be acknowledged that it is ridiculous if you have someone with a small shareholding in workshop A who is a highly qualified engineer who has long been recognised by the industry and the department as appropriate and he or she is offered the opportunity to participate in another workshop but only to the extent—if no more—of the inspection procedure and the signing off.¹⁵

3.22 VICAA agreed that it was appropriate for a person under Regulations 13S and 13Y to have relevant automotive experience, knowledge of the Act, regulations and pertinent ADRs. However, VICAA stated that 'the other requirements are unrealistic and will pose an additional financial burden on small businesses affected by the scheme'.¹⁶

13 Draft Regulations, p 24

14 Evidence, RRAT, 20 September 2001, p 35

15 Evidence, RRAT, 20 September 2001, p 36

16 Supplementary submission, VICAA, 24 September 2001, p 3

Other Issues

3.23 Further issues of concern to AAIMA included:

- a) the requirement in Clause 13ZF(f) that records be kept for a period of 10 years. This period was considered to be too long;
- b) the termination of current approvals, previously for 'life of model' being terminated on 7 May 2002. VICAA argues that this will threaten long term, entrenched business investment, strategies and employment and that there should be no termination of these approvals.¹⁷
- c) the transitional provisions, which give insufficient time for small businesses, and insufficient recognition to delays in seatbelt manufacture, customs delays, shipping delays etc. The AAIMA argued for transitional arrangements to be effective until 2003, in recognition of these factors;
- d) the schedule of fees at Schedule 2;
- e) the 'fit and proper person' requirement for applicants for an RAW and what that might constitute.¹⁸

Enhanced Consumer Protection

3.24 The Australian Automobile Association argued for the strengthening of the consumer protection requirements, ie:

- a) the inclusion of longer term inspection arrangements to ensure greater support for the consumer than is currently provided¹⁹;
- b) Requirements for more information to be provided to subsequent purchasers of the low volume scheme vehicles²⁰;
- c) Greater support in the provision of spare parts²¹.

3.25 The Association also questioned the requirement that a vehicle be in the market for a period of 18 months, arguing that such a period seemed to be arbitrary.²²

17 Supplementary submission, VICAA, 24 September 2001, p 3

18 Evidence, RRAT, 20 September 2001, pp 36-37

19 Evidence, RRAT, 20 September 2001, p 27

20 Evidence, RRAT, 20 September 2001, p 27

21 Evidence, RRAT, 20 September 2001, p 27 and by AAIMA at p 38

22 Evidence, RRAT, 20 September 2001, p 28

CHAPTER FOUR

CONCLUSIONS AND RECOMMENDATIONS

Committee conclusion

4.1 The Committee notes the short time frame it had to consider this legislation, given the potential impact of the Bill, the large number of submissions and the difficulty of assessing the competing claims of the different interest groups who have given evidence to the Committee.

4.2 The Committee is concerned at provisions in the current regulations and would like to see the following matters addressed through amendment to the regulations:

a) Revised eligibility criteria for the Specialist and Enthusiast Vehicle Scheme, to incorporate a default category, whereby a vehicle which does not fall into a Full Volume import scheme and for which there is no comparable option available within Australia, is able to be imported;

b) Revised and simplified criteria for the Registered Automotive Workshop Scheme.

4.3 The Committee is also concerned at:

a) the current processes for the determination and review of eligibility criteria;

b) transitional arrangements provided for under the Regulations.

Recommendation

4.4 The Committee recommends to the Senate that the Motor Vehicle Standards Amendment Bill 2001 be enacted without amendment.

4.5 Further consideration is required relating to certain aspects of the regulations and the Committee intends to make supplementary comment to the Senate on the Regulations.

Senator Winston Crane

Chairman

25 September, 2001

MINORITY REPORT

THE AUSTRALIAN DEMOCRATS

Overview

- 1.1 The Australian Democrats are concerned at recommending the passage of the legislation. The main reasons for this view are the difficulties in being able to properly scrutinise the legislation at short notice and to assess the competing claims of the submittees who have given evidence to the Committee.
- 1.2 Additionally, the Australian Democrats express strong concern at the apparent absence of a direct relationship between the legislation and the regulations. In particular, much of the government's policy proposals are contained within the regulations and not the main body of legislation. In this regard, the following comments are made:

Definition of Specialist and Enthusiast Vehicles (SEVS)

- a) The Government failed to make out its case on the need for narrowing of the scheme. In particular, it failed to explain why the recommendation of the Taskforce concerning the definition was rejected. The taskforce recommended "retaining similar criteria but less subjective". It also recommended removing turbo or diesel variants as alternatives.
- b) We support the recommendation of the Taskforce that the proper wording concerning the definition could be that "*the scheme applies to models that are not full volume models or variants of full volume models*".
- c) The Australian Democrats further believe that the definition of 'Low Volume Scheme (LVS)' should in broad terms be in the Act.

Registered Automotive Workshop Scheme (RAWS)

- 1.3 The Australian Democrats further support the recommendation of the Taskforce that a less onerous workshop registration requirement apply. However, we would support the appropriate quality system accreditation applying, namely, ISO 9001. Nevertheless, it must also be said that some of the requirements and fees proposed by the Department for the scheme seem excessive.
- 1.4 It is the further view of the Australian Democrats that the broad requirements for registration should be in the Act, and the detailed requirements in the regulations.

Transitional Arrangements

- 1.5 The current scheme is scheduled to finish on 8 May, 2002. The Government has offered a 1-year exception for dealers who meet the new SEVS requirement and who have applied for ISO accreditation.

The Australian Democrats recommend consideration of a two-year extension for current CPA who apply for RAWs accreditation (until their application is approved), given the long delay in the regulations coming forward.

Other Issues

- 1.6 The Australian Democrats are also of the view that the '1 800' telephone number for parts is essential to protect consumer interest. We recommend that the Government make participation in the service compulsory and perhaps even provide a small grant to promote and expand the service.
- 1.7 The issue of insurance companies refusing insurance on vehicles is a serious matter. This needs to be urgently investigated, and questions asked as to why companies are refusing policies.
- 1.8 Furthermore, the regulations should also be the subject of extensive review before being enacted.

Recommendation

- 1.9 The Australian Democrats do not support the passage of the legislation in its current form and believe that both the legislation and the regulations need to be further reviewed.

Senator Aden Ridgeway

Senator John Cherry

APPENDIX ONE

SUBMISSIONS

Submission No	Author
1	Trucks Plus, QLD
1A	Confidential
2, 2A, 2B	Lamirose Pty Ltd
3	Milpara Enterprises Pty Ltd - T/A Arem Motors
4	Motor Trades Association of Australia (MTAA)
5, 5A	Motor Trades Association ACT Limited
6	Ford National Dealer Council Limited
7, 7A	Lone Star Vehicle Imports, SA
8	Motor Trade Association of Western Australia
9	Lane Ford, WA
10	Toyota Motor Corporation of Australia Limited
11	BMW Australia and the Australian BMW Dealer Network
12	National Road Transport Commission (NRTC)
13	Mandurah Toyota, WA
14, 14A	Ford Motor Company of Australia Limited
15	Mike Carney Toyota Townsville

Submission No	Author
16	Bill Robertson Toyota, QLD
17	B S Stillwell Motor Group P/L, VIC
18	Doug Clark Toyota Suzuki, NSW
19	Albany Toyota, WA
20	Fairbairn Motors, Emerald, QLD
21	Nissan Motor Co (Australia) Pty Ltd, VIC
22	Bruce Shannahan's Melville Toyota, WA
23	Motor Trade Association of South Australia Inc
24	Mazda Australia Pty Limited
25, 25A	Australian Automobile Association (AAA)
26	Northpoint Toyota, SA
27	Prosser Toyota, WA
28	Tait Toyota, NSW
29	Mareeba Toyota, QLD
30, 30A	Federal Chamber of Automotive Industries (FCAI)
31	Toyota Dealers Association of North Queensland Limited
32	Mitsubishi Motors Australia Ltd
33	Strathpine Toyota and Torque Toyota, QLD

Submission No	Author
34	Vehicle Importers and Converters Association of Australia Inc (VICAA)
35	Victorian Government
36, 36A	Warren Plowright Toyota, NSW
37	Crossover Car Conversions, VIC
38, 38A	Australian Auto Importers and Manufacturers Association Inc (AAIMA)
39, 39A	Commonwealth Department of Transport and Regional Services
40, 40B, 40C	Maracoonda Automotive, QLD
40A	Confidential
41	Victorian Automobile Chamber of Commerce (VACC)
42	Oliver Toyota Bathurst
43	Individual submissions [WA] - common text: Mr Dave McCann Mr Martin Clapton Mr Steve Hunter Mr Graham McAullay Mr Ric Johnson Mr Allan Swallow Mr Peter McDavitt Mr Drew Madasci Mr Steve Ponting Mr Anthony Garbutt Mr Julian Richards
44	Commonwealth Department of Industry, Science and Resources
45, 45A	Ms Jenny Hartwig

Submission No Author

46, 46A	Mr Bill Cuthbert, ACT
47, 47A	Australian Technology Pty Ltd, Consulting Engineers, SA
48	B B Ash Pty Ltd, VIC
49	Lewis Insurance Services Pty Ltd, QLD
50	O G Roberts & Co
51	Allen Group Pty Ltd
52	Kym Dier
53	Richard L Reeves
54	Claridge Holden
55	Ken Mills Toyota
56	Ken Whyte
57	Ichimiki Imports
58	T Fentrell, Biloka
59	Total Vehicle Management

APPENDIX TWO

HEARINGS AND WITNESSES

Canberra, Thursday, 20 September 2001

Ms Audrey Petersen, Lamirose Pty Ltd
Ms Ann Anderson, Maracoonda Automotive
Mr Bruce Shannahan, Managing Director, Melville Toyota
Mrs Jenny Hartwig, Sapid Pty Ltd
Mr Warren Plowright, Warren Plowright Toyota

Department of Transport and Regional Services
Mr Peter Robertson, Asst Secretary, Vehicle Safety Standards
Mr Alan Gascoyne, Director, Certification

Ford Motor Company of Australia
Mr Russell Scoular, Government Affairs Manager

Motor Trades Association of Australia (MTAA)
Mr Michael Delaney, Executive Director
Mr Geoffrey Gardner, Deputy Executive Director
Mr James Bourke, Policy Officer

Australian Automobile Association (AAA)
Mr David Lang, Director, Technical Services
Mr Lauchlan McIntosh, Executive Director

Federal Chamber of Automotive Industries (FCAI)
Mr Peter Sturrock, Chief Executive
Mr Andrew McKellar, Executive Officer
Mr John Egan, Government Affairs Manager, Toyota

Australian Auto Importers and Converters Association (AAIMA)
Mr Gary Blogg, National Vice President
Mr Edward Lee, Member, National Executive
Mr Phillip Smiles, Consultant

Canberra, Monday, 24 September 2001

Vehicle Importers and Converters Association of Australia (VICAA)

Mr Jack Vanstone, National Secretary

Mr Steve Kranz, Manager, Lone Star Vehicle Imports

Mr Douglass Potts, Consulting Engineer, Australian Technology Pty Ltd

Mr Brian Lynch

Trucks Plus, Moorooka, Qld

Mr Kym Dier

Mr Craig Dean, Crossover Car Conversions

Department of Industry Science Resources

Mr Garry Wall, General Manager, Manufacturing, Engineering and Construction Division

Mr Bill Cuthbert

Carramar Enterprises

Department of Transport and Regional Services

Mr Peter Robertson, Asst Secretary, Vehicle Safety Standards

Mr Alan Gascoyne, Director, Certification