

TO:

Miles Brennan
Vice President

Australian Recreational Motorists Association
P.O. Box 7541
Baulkham Hills NSW 2153

Dear Mr Brennan,

Thank you for contacting the Health Australia Party (HAP) again regarding the continued misalignment of vehicle modification legislation, standards and processes across federal, state and territory jurisdictions.

We previously committed to help resolve the misalignment of vehicle modifications prior to the 2019 federal election, and continue to see this as an issue which needs addressing and resolution by state and territory governments. We agree fully engineered and certified modifications should be able to be undertaken by accredited auto-mechanical engineers at the state level, directly against the Australian Design Rules (ADR), similar to the process to certify brand new vehicles prior to sale to the general public; The ADRs are already accepted as a national standard for vehicle builds and certification.

We also support the transfer of responsibility for vehicle modification and certification standards from the Western Australian government to the federal government (as requested in the 2019 federal pre-election commitment), where it should be managed by a Technical Advisory Council comprising the motoring communities and automotive aftermarket industries. This will ensure a common set of legislation, standards and processes can be adopted across all state and territory jurisdictions, resolving the issues of interstate misalignment.

HAP fully supports your initiative to:

- Acknowledge disparity in vehicle modification standards and processes across all state and territory jurisdictions;
- Position the National Code of Practice (NCOP) as reference guides for un-certified / un-engineered vehicle modifications;
- Introduce an engineering and certification program where Australian Chartered Professional Engineers (CPE) are empowered, responsible, and able to freely undertake vehicle modifications based on sound Australian Standards and engineering principles (similar to schemes in NSW and SA), using the Australian Design Rules (ADRs);
- Allow all Second Stage Manufacturing (SSM) modifications approved under federal ADRs to be automatically approved and accepted under state modification standards for current in-service vehicles (same modifications for same vehicles);
- Recognise interstate modifications for registration transfers, or currently registered Western Australian vehicles, were the modifications are undertaken by a CPE from interstate, and an appropriate engineering report is provided;

- Commit to regular reviews of restrictive regulations, standards and red tape, where clear modification and certification details are already provided within the Australian Design Rules, equivalent international standards, or where there is lack of evidence to prove modifications are unsafe;
- Establish a Technical Advisory Committee (TAC) from motoring community and industry groups, to review, advise and approve requirements for department of transport enactment;
- Coordinate a meeting between the Transport Minister and Western Australian motoring community with the focus to review and overhaul the special interest vehicle concession scheme and the restrictions placed vehicle usage;
- Provide 90 days of general road use each year for special interest vehicle registration, outside of organised club events and maintenance;
- Work with motoring community and industry groups to generate education programs to cover safe modifications and driving in non-standard conditions, such as sand driving, towing caravans, undertaking vehicle recoveries;
- Engage other Council of Australian Governments (COAG) representatives and seek to harmonise vehicle standards and regulations where possible, through the Australian Motor Vehicle Certification Board (AMVCB);
- Agree to transfer responsibility of vehicle modifications regulations and standards to the Commonwealth (or a national regulator), on the condition that:
 - o Moving to a Federal model does not negatively reduce, restrict, or prohibit those provided by the state, and committed above; and
 - o It is agreed by Western Australian motoring community and industry representatives.

Thank you for bringing this matter to our attention and we trust the disparity between states can be resolved in an efficient and mutual manner.

Yours sincerely

Isaac Golden

Dr Isaac Golden

National Secretary
Health Australia Party