



**Michael Berkman MP**  
For Maiwar ▲

28 July 2020

Mr Miles Brennan  
Vice President, Australian Recreational Motorists Association  
Via email: [miles.brennan@arma.net.au](mailto:miles.brennan@arma.net.au)

Dear Mr Brennan,

### **Queensland 2020 election**

Thank you for your email of 3 May 2020, setting out key election priorities for the state election later this year.

I note the Australian Recreational Motorists Association was formed in September 2019 and that you are dedicated to opening public lands up to all recreational users and fighting to ensure legislation does not impede their legitimate recreational activities.

Since the Queensland Greens' inception in 1991 we have had a consistent commitment to the environment, including by expanding national parks and calling for tougher protections for the nature and wildlife within them.

To that extent, the aims of your organisations and ours are quite different, but we fully support your push for harmonisation between state and federal laws.

I'm happy to address each of the pre-election commitments that you are seeking, as follows. All positions elaborated here are complementary to public Greens announcements which are already on the record.

#### **1. Acknowledge disparity in vehicle modification standards and processes across all state and territory jurisdictions**

We acknowledge this disparity and support your organisation's call for greater harmonisation across Australia.

#### **2. Position the National Code of Practice (NCOP) and Queensland Code of Practice (QCOP) as reference guides for uncertified/un-engineered vehicle modifications**

We support an evidence-based approach to regulating vehicle modifications. Where relevant, we support a conservative approach with an emphasis on potential risks to pedestrians, cyclists and motorists.

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- 3. Introduce an engineering and certification program where the Australian and Queensland 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).**

We support a trial of such an initiative, but our budgeting priorities would be based on our existing platform in relation to transport: <https://greens.org.au/policies/planning-and-transport>.

- 4. 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).**

We support greater harmonisation between Australian Design Rules and state modification standards for current in-service vehicles.

- 5. Recognise interstate modifications for registration transfers, or currently registered Queensland vehicles, where the modifications are undertaken by a CPE from interstate, and an appropriate engineering report is provided.**

Our support for greater harmonisation across jurisdictions would encompass mutual recognition between states and territories with regard to vehicle modifications, subject to the appropriate criteria being met, including appropriate engineering reports.

- 6. 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 a lack of evidence to prove modifications are unsafe.**

We support an evidence-based approach to vehicle modification, requiring evidence to provide modifications are safe rather than an absence of evidence they are unsafe. Given the huge numbers of fatalities which are attributable in Australia to motor vehicles, we consider vehicle modification to be an area requiring robust regulation and standards, where appropriate.

- 7. Establish a Technical Advisory Committee (TAC) from motoring community and industry groups, to review, advise and approve requirements for department of transport enactment.**

We support greater participatory democracy when it comes to government regulation, with particular input from interested communities. To that end, it makes sense for motoring community groups to be able to contribute to decisions affecting them.

- 8. Coordinate a meeting between the Transport Minister and Queensland motoring community with the focus to review and overhaul the special interest vehicle concession scheme and the restrictions placed on vehicle usage.**

In the event the Greens hold a Transport Ministry after the 2020 state election, we will be in a position to facilitate such a meeting.

- 9. Work with the motoring community and industry groups to generate education programs to cover safe modifications and driving in non-standard conditions, such as beach driving, towing caravans and undertaking vehicle recoveries.**

The Greens support an investment in community education about non-standard driving conditions and vehicle modification, with input from the motoring community.

**10. 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).**

The Greens support greater harmonisation of vehicle standards and regulations across jurisdictions, using the appropriate channels for achieving this.

**11. Agree to transfer responsibility of vehicle modifications regulations and standards to the Commonwealth (or a national regulator), on the condition that:**

- a. moving to a Federal model does not negatively reduce, restrict, or prohibit those provided by the state, and committed above; and**
- b. it is agreed by Queensland community and industry representatives.**

We understand the benefits that a national regulator, or Commonwealth responsibility, would have for harmonisation of vehicle modification regulations and standards, and believe this should be explored in the appropriate forums.

I hope you enjoy campaigning this year, and I hope that this information is of assistance. Please do not hesitate to contact my office on 07 3737 4100 if you would like to discuss this matter in more detail.

Kind regards,



Michael Berkman MP