

**Australian Recreational Motorists Association**

P.O. Box 7541  
Baulkham Hills NSW 2153



Dear Miles,

I am writing to you about the "Time To Align" (TTA) campaign currently being coordinated by the Australian Recreational Motorists Association (ARMA), seeking to allow fully engineered vehicle modifications to be certified by qualified auto-mechanical engineers, directly against the Australian Design Rules (ADR), similar to how brand new vehicles are certified for the Australian automotive market, as well as aligning legislation, standards and policies across jurisdictions at a national level.

The Shooters Fishers and Farmers Party (SFFP) have a close attachment and representation to regional areas, communities and industries, and know too well the issues faced by overly restrictive state-based legislation, as an additional level of bureaucracy where there is already suitable national legislation, standards and policies available. Further, unnecessary levels of state-based legislation creates disparity between the different states and territories, and requires the replication of bureaucratic departments and personnel within each state, which could be minimised by simply adopting the national standard by all state and territory jurisdictions.

We support the creation of a Technical Advisory Council (TAC) comprising representations of the Australian motoring communities and automotive aftermarket industries, to help guide safe, practical and affordable legislative change for modifying in-service motor vehicles. We acknowledge the TTA changes proposed by ARMA are not intended to undermine the safety or integrity of any state transport authority or general public, rather it allows fully engineered modifications to be undertaken by certified auto-mechanical engineers, using a variety of current Australian design and modification standards, which they are qualified to implement. We don't believe it's appropriate that modifications can be undertaken safely and legally on brand new vehicles using the ADRs, however the same modifications would be classified as unsafe and illegal by state modification standards, if the vehicle is registered prior to adding the exact same modifications to the exact same vehicle make and model.

Additionally, we note that NSW, SA, and WA have all introduced initiatives for their special interest vehicle registration schemes, allowing modified vehicle owners up to 90 days of general road use each year, while maintaining vehicle registration fees at a 75% annual cost saving; the Queensland scheme is lagging behind that of other jurisdictions.

We have previously provided written pre-election commitments to support the motoring communities in order to improve modification legislation at the 2017 Queensland state election, 2019 Federal and NSW elections, and will continue to provide our full support to the TTA campaign, as it is a common-sense and practical approach to automotive legislative change.

SFFP fully supports the TTA campaign, including, but not limited 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, where 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 continuing to engage SFFP in this campaign, we look forward to working on this initiative, for the wider Australian motoring communities and automotive aftermarket industries.

Sincerely,

*Malcolm Richardson*

Malcolm Richardson  
 QLD Leader and State Secretary  
 Shooters, Fishers & Farmers Party QLD Inc.

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