



15 September 2020

Mr Miles Brennan

Australian Recreational Motorists Association

Dear Mr Brennan

Subject: Pre-Election Request to Change Vehicle Modification Standards

As with the 2019 Australian Federal Election, the Sustainable Australia Party is again committed to supporting the Time To Align campaign in the ACT Election on 17 Oct 2020, in order to harmonise legislation, standards, and regulations between all Australian states and territories for vehicle modifications.

While each state and territory has remit for self-regulating vehicle modification legislation within their own jurisdiction, there is no reason in this current age that this legislation cannot be transitioned to the Commonwealth (or a national regulator), as planned during the federal election campaign, with the Australian motoring communities and automotive industries providing input as technical advisors. This would certainly minimise the duplication of each state and territory government replicating the same types of modification legislation.

Australia already has federal legislation adopted nationally for the certification of brand new vehicles in the form of the Australian Design Rules (ADR), and see no reason why state and territory jurisdictions cannot accept these existing federal standards as a basis for vehicle modifications to currently registered, in-service vehicles; particularly if the modifications are undertaken professionally and certified by auto mechanical engineers throughout Australia.

To this end, Sustainable Australia commit to assist the Time to Align campaign as per request:

- 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 Australian Capital Territory 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 Australian Capital Territory 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:
 - Moving to a Federal model does not negatively reduce, restrict, or prohibit those provided by the territory, and committed above; and
 - It is agreed by Australian Capital Territory motoring community and industry representatives.

Given the significant economical burdens to our communities due to the COVID-19 pandemic, Sustainable Australia believes supporting the motoring community through rational vehicle modification reform, will help to re-stimulate the ACT aftermarket industry, boost our economy, while maintaining safe vehicle modification standards for both on and off road vehicles.

Kind regards

A handwritten signature in black ink, appearing to read "William Bourke".

William Bourke
President

Sustainable Australia Party

www.SustainableAustralia.org.au

