

SHOOTERS FISHERS and FARMERS



Mr Miles Brennan
Vice President
Australian Recreational Motorists Association (ARMA)

Dear Miles,

The Shooters Fishers and Farmers Party (SFFP) in Western Australia 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 create 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.

Regarding the Australian Recreational Motorists Association (ARMA) Time To Align campaign, 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 Time To Align 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.

We agree that it is inappropriate for modifications to be considered safe and legal on brand new vehicles using the , Australian Design Rules while the same modifications would be classified as unsafe and illegal by state modification standards where the vehicle is registered prior to adding the exact same modifications to the exact same vehicle make and model. This is illogical.

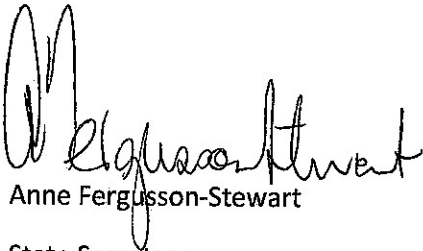
SFFP WA provides in-principle agreement for the TTA campaign including:

- 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;
- 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);

Thank you for continuing to update SFFP WA on the progress of this campaign and I wish your members every success with the initiative.



Anne Fergusson-Stewart

State Secretary

5 March 2021