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## ATSA MAKES SUBMISSION TO ROAD VEHICLE STANDARDS ACT REVIEW

ATSA, supports strong market competition however, is concerned that proposed amendments to the Road Vehicle Standards Rules, relating to ‘mobility criteria’, could have detrimental and unintended consequences by removing Australian Disability Safety Standards requirements for imported disability vehicles sold into Australia.

Good intentions to provide access to cheaper vehicles could create safety hazards by allowing substandard vehicles into Australia that do not fully comply to Australian Safety Standards for Disability vehicles. The question, why do we promote ANCAP ratings to support safer vehicles for the general public, and consider that imported Disability vehicles, do not need the same scrutiny or consideration?

In addition, there is no requirement for ongoing service support and spare part provision, leaving the buyer at risk with a vehicle that is critical to mobility without the ability to have them fixed.

The proposed “Road Vehicle Standard Rule, Tools Part 4, Specialised and Enthusiast Vehicles Register, Division 6, Section 120, Mobility Criteria”:

- Is not consistent with relevant Australian Disability Safety Standards
- Likely to compromise occupant safety in the event of an accident
- The lack of compliance to Australian Standards places the local specialised Disability Car Modification industry at a significant disadvantage. i.e. 2 different sets of rules
- Likely to result in a failed Australian Disability Car Modification industry and the loss of specialty skills

ATSA urges careful re-consideration of the proposed Road Vehicle Standards Act 2017. Our full submission is here [http://atsa.org.au/Portals/0/ATSA\\_Submission\\_to%20Imports\\_final.pdf](http://atsa.org.au/Portals/0/ATSA_Submission_to%20Imports_final.pdf).

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*Assistive Technology Suppliers Australasia Inc (ATSA) is the peak industry association representing organisations that supply assistive technology (AT) throughout Australia. Our members manufacture, import, distribute, retail, hire and service a wide range of AT including mobility devices, modified motor vehicles, lifters, homecare beds, communications devices, recreational/sporting AT and pressure care.*