

RACQ response to questions from the *Queensland Parliamentary Inquiry into vehicle safety, standards, and technology, including engine immobiliser technology*

Question 1. Austroads provided evidence to the committee that the main challenge in regard to road safety in Australia and Queensland is the age of our vehicle fleet. How would you respond to this suggestion and do you have any suggestions regarding how the safety of Queensland's fleet can be improved?

Response

- Clearly older cars have fewer safety features and will generally be less 'crashworthy' than later models, so there is certainly a link between vehicle age and crash safety. However this is a very simplistic view of the subject and fails to consider that vehicle safety is only one part of the issue. Road safety strategies, be they international, federal, state, or local government all look at road safety as a complete system of safer cars, safer drivers, and safer roads. And that is RACQ's policy position too.
- We believe a vehicle's crash performance should be considered as the last line of defence but acknowledge that technology is increasingly being used to avoid crashes, though this is an adjunct to, not a substitute for safe roads and safe drivers.
- As well as improving the general safety of the vehicle fleet (Safer vehicles) we need to make roads more forgiving of driver error (safer roads), improve driver standards (safer drivers), and enforce speed and road rule compliance (the Safe System).
- While it would be desirable to modernise the Queensland fleet to improve its crashworthiness, we believe this is a national affordability issue rather than one that an individual state can influence. In view of this we believe our messaging to "buy the safest car you can afford" is appropriate.

Question 2. For vehicles that are pre-2001 and do not have any immobiliser device fitted, it has been suggested that owners of these vehicles be required to Have an immobiliser fitted as part of Queensland's vehicle registration process. Would you support this view or does RACQ have any other suggestions?

Response

RACQ would support this proposal if it can be shown that it is effective in reducing vehicle theft, is cost effective and doesn't place an unreasonable financial burden on motorists who, by financial necessity, drive older cars and are probably least able to afford the installation of such equipment.

This proposal appears to be similar to Western Australia's mandatory immobiliser program which has been in place since 1999.

- By all reports it has been effective in reducing theft numbers from the very high levels experienced at the time of its implementation.
- However, it's important to note that the Western Australian scheme only deals with light vehicles up to 25 years old.
- Given that original equipment immobilisers have been mandatory on most light vehicles since 2001, this program now has limited application.

We note in question 13 the suggestion that about 7% of the Queensland fleet is not fitted with an immobiliser and that this group is twice as likely to be stolen.

- We believe this figure needs to be qualified as there will be vehicles in this group that are simply not a theft target due to their age and type.
- There are for instance many Queensland registered vehicles that are more than 50, and in some cases more than 100 years old. These vehicles are generally infrequently used and securely stored, so they present virtually no theft risk. In the rare event such vehicles are stolen, it is generally a targeted theft for parts rather than for joy riding or to commit crimes.
- To ensure public money is not wasted, there needs to be some proper analysis of which vehicles present the greatest risk of theft.
- As noted previously, the Western Australia government has deemed this to be vehicles up to 25 years old that do not have an immobiliser.

The committee should also consider the possibility that any form of ‘target hardening’, in this case mandatory fitting of immobilisers, may encourage other forms of crime, for example physical violence, to gain access to vehicles.

Question 3. The committee has heard from stakeholders supporting the installation of a ghost immobiliser device as an added security level. Would RACQ please comment on these types of devices, including advantages and disadvantages?

Response

- Ghost is a particular brand of security system, and it isn’t clear from this question if the suggestion is to require its fitment or if the term ghost is being used as a generic term for this type of system.
- RACQ would be concerned if the Queensland Government proposed to provide a commercial advantage to a particular brand of security system.
- RACQ only supports the installation of immobilisers that comply with the requirements of AS/NZS 4601, but it isn’t clear if this or any of the products of this type meet this standard.
- This type of system is a keypad style immobiliser (it’s necessary to enter a code to start the engine) but instead of having a conventional keypad it’s programmed to use existing vehicle controls to enter the start authority.
- Ghost type immobilisers are only suitable for vehicles using Can Bus electrical system architecture. This architecture started to become common from around 2007.
- Their advantage is that there is no key fob attached to the vehicle keys with which to disable the system in the event the keys are stolen.
- There is also no need to add a keypad to the dash so someone unfamiliar with the car won’t know it’s there, or which control to use to disable it.
- The disadvantage is the need to enter the code, which many operators will find inconvenient.
- Cost may also be a disadvantage however we have no knowledge of likely purchase and installation costs.

Question 4. As an insurer, does RACQ offer any incentives through a lower policy premium to vehicle owners who have installed an additional security device, such as a ghost

immobiliser, to their vehicle? If no, would RACQ be willing to consider this option as an incentive for persons to have a ghost immobiliser or similar type device fitted?

Response

RACQI offers a discount of up to 5% of the premium to a maximum of \$20 per policy for motor vehicles fitted with non-standard immobilisers/alarms. This applies to motor comprehensive insurance and fire theft and third-party liability car insurance policies.

Question 5. On page 8 of your submission it mentions the current review of the Queensland Code of Practice – Vehicle Inspection Guidelines. What changes would the RACQ like to see occur here, including the reasons for suggesting each change?

Response

RACQ expects that any guidelines provide clear assessment requirements and be written with the intended audience i.e. those required to make a decision about a vehicle's compliance and safety, in mind. Where necessary, guidance should be given as to what needs to be checked and its required performance, and if it is not obvious, or is open to interpretation, how things are to be checked. This is particularly important where the technology is new or not yet widely available.

It should not be assumed that users of the guidelines are necessarily familiar with all technology.

If there are sources of information that, define a performance standard, need to be referred to for the purposes of making an informed judgement, or are needed as sources of reference, these references need to be included.

We also expect that such guidelines will be continually updated to reflect new and emerging technology or identified shortfalls or ambiguity in the instructions.

Question 6. Can you please elaborate on RACQ's concerns about Queensland's Written Off Vehicle Inspection (WOVI) system and how does the RACQ propose that this system could be improved?

Response

The table below is an extract from the original 2017 WOVI discussion paper. It's shown as Appendix 2 at page 23 of the original submission.

It graphically shows that the current Queensland WOVI process fails to address the fundamental issue of repair quality. Note the content of the highlighted section on the next page.

Instead, it relies on the Safety Certificate inspection to identify shortcomings in the quality of repairs. The Safety Certificate inspection is a general assessment of a vehicle's compliance with vehicle standards, conducted by persons who are not required to have specialised knowledge of the body repair industry and its processes.

Additionally, our view is that it is completely unreasonable to expect even someone with body repair industry experience to determine if a repair has been carried out to an acceptable standard without knowledge and oversight of the repair process. (More discussion of this point can be found starting at page 18 of the original submission)

All other jurisdictions require repair quality assessments, and sometimes multiple assessments. Note also that all jurisdictions other than Queensland require certification that the SRS (airbag) system is operational.

Our 2017 discussion paper called for closer alignment of WOVl processes with those of other jurisdictions. This would have required defining such things as appropriate repair standards, introducing progress inspections at defined stages of the repair, defining which parts from wrecks could not be reused (seatbelts, airbags etc), and mandating certification of SRS system operation.

WOVI requirements by State and Territory

	QLD	VIC	TAS	ACT	SA	WA	NT
ID check	X	X	X	X	X	X	X
Stolen vehicle check							X
Repair diary required	4	X	X	X	X		
Parts receipts	X	X	X	X	X	X	X
Before and after pics	5	1	1	1	X	9	X
Wheel alignment report					X		X
Body alignment/ measurement report		X	3	X	X		
Structural certificate/inspection			X	3			X
SRS report		X	X	3	X	X	X
Repair quality inspection	6	X				X	
RWC/SC	X	X	X	X	X	X	X
Progress inspections			3	10		2	
Manufacturer repair standards	X	X	X	X	X		X
Or, repaired to appropriate industry standards	X	X		X	X	X	
Repaired to defined standards				X			
Specified repairs for flooded cars			7		X		
Defined welding processes / standards				X			X
Ban on re-use of certain parts			X 8	11	X		
Engineer's certificate				3	X		X

New South Wales only allows the re-registration of written off vehicles that have no non-repairable damage and those in an exempt category.

1. Before photos may be / are required
2. Inspections of structural repairs are required before paint and filler is applied.
3. As required.

QLD doesn't require a repair diary per se. However, the WOVI checklist mentions a "repair document of some nature" *

4. Photos appear to not be a mandatory requirement. i.e. the WOVI checklist states:
"Photographs of vehicles in their damaged state and during various stages of repair will always assist the inspection to proceed with less difficulty and these should always be available" *
5. From WOVI checklist: *"A WOVI is a visual inspection to detect vehicle identity irregularities that require further investigation. It is not an inspection of the structural integrity of the vehicle, or the quality of restoration work carried out (e.g. panel or suspension repairs), and does not purport to be a guarantee of such matters"* *
6. Water immersion report AMBRIS6 is required.
7. SRS ECUs from water damaged vehicles cannot be reused.
8. Photos showing the stages of the repair process are required.
9. Vehicle having undergone structural or sectional repairs or parts from a water immersed vehicle are to be left exposed for inspection.
10. Body parts from salt water affected vehicles cannot be used to repair a written off vehicle.

* *These requirements were outlined on the Queensland Inspection Service website in 2017 however we believe some may have now been altered or removed. It is not clear if they are/were QIS or Queensland Government requirements.*

Question 7. The committee notes that the New South Wales WOVI system allows for the re-registration of written-off vehicle in limited circumstances. Could RACQ please comment on the advantages and disadvantages of the NSW and Victorian systems compared to the Queensland system?

Response

- RACQ has limited knowledge of the operation of the NSW WOVI system, however it's reasonable to think that the elimination of repairable write offs has reduced the administrative workload and costs to some extent.
 - Anecdotally, the move also displaced a portion of vehicle crime to other jurisdictions, however we have no detailed knowledge of this. DTMR and QPS would likely be able to provide informed commentary on this.
 - The elimination of repairable write offs would certainly have impacted insurance costs due, in part, to a reduction in salvage values.
- The Victorian WOVI system is very robust and incorporates the checks we believe necessary to ensure repairs are carried out to a satisfactory standard.
 - We are aware of anecdotal reports of vehicles failing the Victorian inspection and being passed in Queensland and that as a result Victoria requires reinspection of certain vehicles if they return there.
- Again, anecdotally, Queensland is regarded as the 'go-to' place to have a vehicle cleared from the register and is considered by some as the weak link in the WOVI chain.

a) Which aspects of the WOVI systems used in other Australian jurisdictions that RACQ would support and the reasons for this support?

Response

- Discussions about the elimination of repairable write offs aside, RACQ believes there is a need for a more appropriate and focussed inspection process to ensure structural damage has been repaired to a satisfactory standard.
- This includes progress inspections during structural repairs to ensure they meet a satisfactory standard and that repair methods comply with those set by the vehicle manufacturer, or in their absence, accepted industry practice.
- Depending on the scope of work, these inspections may need to be carried out before the application of body filler, paint, and the refitting of panels, trims, etc.
- To maintain the security and integrity of the WOVI system and to ensure the safety of the inspectors, the vehicle must be presented to the inspection centre for this. i.e. inspectors should not be expected to travel to the premises of a vehicle owner or repairer to carry out an inspection.
- A list of parts from damaged vehicles that cannot be reused should be developed and supporting regulation written. This should include items such as defined safety components (seatbelts and airbags) as well as body sections taken from salt water affected vehicles.
- A mandatory assessment of SRS and other safety systems by an accredited dealer for the make of vehicle being repaired is needed.

Question 8. At the committee's hearing on March 24 2021, the Department of Transport and Main Roads advised the committee that the changes proposed effectively mean that repairable write-offs will effectively no longer exist and most vehicles will become a statutory write-off. Could you please respond to this suggestion, including whether RACQ supports the is proposal or has other suggestions to improve the current system?

Response

- It's important to note that RACQ has never called for a ban on the repair of vehicles deemed to be repairable i.e. repairable write offs. However since the inception of the WOVI scheme we have asked that the quality of the repairs carried out on these vehicles be inspected to ensure they are of an acceptable standard. This is what was originally proposed in the 2017 discussion paper.
- However, there is no doubt that eliminating repairable write offs will provide a higher level of protection for used vehicle buyers who may unknowingly purchase a repaired write off.
 - It will however have consequences for insurers in the form of higher costs (in part due to reduced salvage value) and it's reasonable to think that these costs will be passed on to consumers in the form of higher insurance premiums.
 - It will also force those who make a living repairing these vehicles out of that business, regardless of the quality of their work.
- The alternative we proposed - the introduction of a repair quality standard and increasing scrutiny of repairs, would also have affected salvage values due to increased repair and certification costs.
 - Some of those involved would also likely exit the industry due to reduced profitability, the increased level of scrutiny, or their inability to meet acceptable repair standards.

- This proposal would require WOVI inspectors with either appropriate body repair industry experience, or additional training for current inspectors.
- Given that WOVI inspections are currently provided by a commercial operator contracted to the Government, it would be reasonable to expect that these additional costs would need to be recouped through a significant increase in fees for the service, which will make the repair of these vehicles even less attractive, and further reduce demand.
- Alternatively, WOVI inspections could be brought in-house by DTMR, however this is unlikely to be cost effective as it would require the set up of a complete WOVI inspection service as well as the hiring and training of necessary staff. Unless the government subsidised the cost of the inspection, which we would not support, this option is likely to result in very high inspection costs.
- We also believe that regardless of the outcome of these discussions, prospective buyers of repaired written off vehicles should be informed of the vehicle's history by introducing an ongoing mandatory notification requirement, as is the case in Victoria.

Question 9. The committee notes that on pages 11 and 12 of the RACQ submission it is stated that there are some inconsistencies between jurisdictions regarding light vehicle modification rules. Could RACQ please expand on these differences and advise whether there is any particular areas of difference with which RACQ has concerns?

Response

RACQ does not have the capacity to review all the modification allowances of all Australian jurisdictions. However, the DTMR website provides guidance as to the specific Queensland variations. See [Light vehicle modifications \(Department of Transport and Main Roads\) \(tmr.qld.gov.au\)](http://tmr.qld.gov.au)

- RACQ's view is that DTMR applies an engineering focused and reasonable, if slightly conservative approach to the subject, but this approach isn't always consistent with other jurisdictions. As already noted, this can cause problems when vehicles transfer between jurisdictions. As outlined in the initial submission, what is acceptable to one jurisdiction may not be accepted by another.
- There are also issues with recognition of modification certifiers. i.e. If a particular certifier is not recognised by the new jurisdiction, the modification may need to be recertified by someone who is, at considerable additional cost to the vehicle owner.

Question 10. On page 12 of the RACQ submission, it notes that the aftermarket industry in Queensland has been critical about Queensland not adopting certain modification changes. Could RACQ please comment on whether they consider the various rules between jurisdictions are clear and whether there are any areas that require improvement?

Response

The rules are clear and are generally written in a similar manner, however there are some inconsistencies, as noted in the answer to the previous question.

The case mentioned in the original submission related to differing views about GVM and towing mass upgrades between jurisdictions, which effectively prevented certain national aftermarket

suppliers selling some parts/solutions in Queensland. This conflict was driven by the commercial interests of certain parties.

As noted in the answer to the previous question, we believe DTMR applies an engineering focused and reasonable approach to the subject, and we generally support its views. We have provided this advice and other commentary to DTMR in a recent submission about GVM and towing upgrades, and also flagged our concerns about radical increases to GVM and towing capacities.

Question 11. The Queensland Police Union of Employees (QPUE) has advocated for a trial of ghost immobilisers in Townsville. They have suggested that this trial would cost \$5.4 million based on installation cost. How would RACQ respond to this suggestion and are you able to provide any information to the committee regarding whether the stated installation cost is realistic and what would the likely cost of ghost immobiliser devices be?

Response

- RACQ has no firsthand experience with these systems and no knowledge of likely costs.

Question 12. In 2019, the Australian New Zealand Policing Advisory Agency (ANZPAA) investigated the issue of remote engine immobilisers. ANZPAA concluded in their 'Remote Immobiliser Reference Report 2019' that mandating remote engine immobilisers was not yet feasible or possible. Do you wish to respond to the findings in this ANZPAA report?

Response

- A representative from RACQ was involved in the production of the ANZPAA report.
- We have reviewed the report's conclusions and believe its findings and recommendations are still accurate.
- The necessary technology, while it exists, is not mature enough or currently suitable for use in Australia, nor is it widely available or used in other markets.
- If a decision were made to implement this technology through the Australian Design Rules, it would be very costly and take many years before sufficient vehicles were so equipped that it would provide any meaningful level of protection.
- Additionally, attempting to retrofit this technology to the existing fleet would be extremely costly and technically difficult.
- RACQ believes the prime aim of any vehicle security system should be to prevent the vehicle being stolen rather than disabling it after the event.

Question 13. Engine immobiliser technology has been mandatory for new passenger vehicles sold in Australia since 2001. However, approximately 7% of Queensland vehicles do not have any type of immobiliser fitted and these vehicles are twice as likely to be stolen then those with an immobiliser.

- a) How would RACQ respond to the suggestion that the fitting of an immobiliser in all pre-2001 vehicle should be a requirement of registering that vehicle in Queensland?

Response

- This question is similar to question 2 and has been addressed there.

- b) What would the RACQ consider to be the advantages and disadvantages of the Queensland government introducing a scheme requiring an immobiliser be fitted to pre- 2001 vehicles in this manner?

Response

- If the intent is to require an immobiliser in all pre 2001 vehicles, as noted in the response to question 2, there will be a proportion of vehicles in this group that are not a theft target, and their owners would therefore receive no benefit from the installation of an immobiliser.
- Very old vehicles are often so simple in their design that an immobiliser would either offer very limited protection or, would be easy to bypass, but these vehicles aren't generally a theft target anyway.
- Aftermarket immobilisers may assist in protecting vehicles that did not have an immobiliser as standard equipment, however this protection would only be from traditional forms of attack, such as attempts to manipulate or by-pass the ignition switch etc. As noted in the original submission, most vehicles are now stolen with keys. If the aftermarket immobiliser utilised a key fob, security of keys would still be essential to protecting the vehicle. Note too that this group of vehicles will not have the necessary electrical system architecture to support a ghost style immobiliser.
- There are also some post-2001 light vehicles that don't, and were not required, to have an original equipment immobiliser.

Question 14. The theft of car keys is attributed to 70% of vehicle thefts in recent years. How can key security be better promoted and encouraged among Queenslanders?

Response

The National Motor Vehicle Theft Reduction Council and RACQ has promoted the importance of key security regularly for many years. However, the message appears to have had little effect. Perhaps a wider reaching government sponsored campaign is in order.