



15 April 2021

Committee Secretary
Transport and Resources Committee
Parliament House
George Street
Brisbane Qld 4000

Email: trc@parliament.qld.gov.au

To: Transport and Resources Committee

Inquiry into Vehicle Safety, Standards and Technology, including Engine Immobiliser Technology

1. Introduction

1.1 The Motor Trades Association (MTA Queensland) responds to the Parliamentary Transport and Resources Committee request for submissions to the Inquiry into vehicle safety, standards and technology, including engine immobiliser technology.

2 Terms of Reference

2.1 The Queensland Parliament agreed a motion by the Minister for Police and Corrective Services Mark Ryan to inquire and report on:

- Options to reduce or prevent vehicles being used illegally or dangerously on Queensland roads, including vehicle engine immobilisation technology, non-technology options, operational considerations or other measures;
- Lessons learned from other jurisdictions, particularly regarding the implementation of vehicle engine immobilisation technology to the existing vehicle fleet;
- The Commonwealth's role in relation to vehicle standards and safety, and measures the Commonwealth could take, including requiring all new vehicles to be fitted with remote engine immobilisation technology;
- The effectiveness of any proposed measures in improving road safety, preventing crime and assisting police in operational matters;
- A recommended framework for legislative, policy and operational implementation of any proposed measures;
- The benefit to and role of insurers in supporting any recommended measures;
- Options to improve vehicle standards and safety in Queensland, including in relation to the:
 - current Australian vehicle design rules;
 - inspection regime for registered vehicles;
 - pre-sale certification scheme, including measures to reduce fraud and improve consumer safety;
 - management of written-off vehicles and 're-birthing';

Motor Trades Association Queensland

Address Freeway Office Park, Building 8, 2728 Logan Road, Eight Mile Plains Qld 4113 [Postal PO Box 4530, Eight Mile Plains Qld 4113]

Telephone +61 7 3237 8777 | **Toll Free** 1800 177 951 | **Email** info@mtaq.com.au | **Website** www.mtaq.com.au

- after-market vehicle modification framework, including achieving consistency to ensure best alignment with other Australian jurisdictions.

3. Preamble

3.1 The MTA Queensland understands that government has a duty of care in respect of the technical performance and specification safety of personal use motor vehicles to protect the safety of the motoring public and health of the general public.

3.2 The current policy framework that includes the *Road Vehicle Standards Act* (commencing in full 1 July 2021), *Road Vehicle Standards Rules 2019*, and the Australian Design Rules has demonstrated a competence to protect the safety of the motoring public and to set standards for the health of communities. Emerging vehicle technologies requires a national approach across Commonwealth and State legislation and regulations. A survey across countries including Australia, revealed consumers valued safety more than any other vehicle feature; with 53 per cent of respondents indicating a desire for higher safety standards as their primary reason for wanting to replace an old car (McKinsey 2019 Survey).

4 Response to terms of reference – Remote Engine Immobilisers

Options to reduce or prevent vehicles being used illegally or dangerously on Queensland roads, including vehicle engine immobilisation technology, non-technology options, operational considerations or other measures

4.1 Immobilisers have been mandatory in all passenger and light commercial vehicles since 2001 and have contributed to a reduction in motor vehicle theft. Then, Australia had one of the highest rates of motor vehicle theft in the western world but since there has been a significant reduction of 35.32%. The National Vehicle Theft Reduction Council’s (NVTRC) comprehensive auto-theft research system (CARS) details the short-term thefts in all jurisdictions over the past 4 years:

| Theft Year | Short term thefts | Profit motivated thefts | Total thefts |
|------------|-------------------|-------------------------|--------------|
| 2016 | 42,669 | 14,574 | 57,243 |
| 2017 | 39,503 | 13,607 | 53,110 |
| 2018 | 39,573 | 13,832 | 53,405 |
| 2019 | 42,847 | 15,294 | 58,141 |
| 2020 | 36,533 | 12,905 | 49,438 |

Short term thefts ‘represents vehicles stolen by opportunistic thieves for use in the commission of other crimes, joyriding, or transport. All recovered vehicles regardless of their level of damage were classified as short-term theft. Short-term thefts include an unknown but assumed small number of vehicles that were recovered in a substantially stripped condition and were the likely target of profit-motivated thieves’ (CARS).

4.2 Vehicle Standard (Australian Design Rule (ADR) 82/00 - Engine Immobilisers) 2006 sets the requirements for engine immobilising devices fitted to vehicles to prevent the vehicle being driven away powered by its own engine. The Standard complies with the technical requirements adopted by the United Nations – Economic Commission for Europe (UNECE) or Global Technical Regulations (GTRs).

ADR 82/00 applies to:

- when set (i.e., enabled) the immobiliser must disrupt either the fuel supply, the ignition or the starter or if fitted to an individually constructed vehicle (ICV) or as an aftermarket installation, the immobiliser must be shown to disrupt at least two of those systems;
- the immobiliser must be unset (i.e., disabled) before or during the engine on cycle by:

- unlocking the driver's door and setting the ignition switch to the on position;
- using a keypad;
- using a remote-control device;
- If disabled, switching the ignition to the off position and opening the driver's door must cause the immobiliser to set within 5 minutes of removing the key from the ignition switch; and
- a visual means of showing that the immobiliser has been set or unset must be provided. This can either be an internal (i.e., the interior dome lamp or a dash mounted warning lamp showing set/unset) or external (the turn signals flashing for no more than 3 seconds).

4.3 In the context of ADR change, Minister for Police and Corrective Services Mark Ryan (Statement, October 2018) succeeded in having the issue of REIs on the agenda of the nation's Ministerial Council of Police and Emergency Management Ministers. The Council's 28 June 2018 Communique stated: 'Council Members agreed that a Remote Engine Immobiliser system, efficiently capable of providing significant safety benefits without risk, is not currently available to implement on a nationwide whole-of-fleet scale but that, as technology advances, opportunities for further work in this space may become possible.'

Minister Ryan said: 'getting the issue on the Ministerial Council agenda was a good start but many challenges lie ahead. For example, it's argued that the only practical way for police use of remote engine immobilisers or related technologies to be effective is through legislation requiring all new vehicles built in or imported into Australia to have the necessary equipment fitted on manufacture. This would be a significant political issue involving several branches of government as well as all car manufacturers operating in the Australian market. But Minister Ryan said there is no point in waiting, the time to start exploring these issues is now' (Statement, 18 October 2018).

4.4 Australian Government policy is for national standards for road vehicles, the ADRs, to be harmonised with international regulations (UNECE or GTRs.) Research reveals the European Union (EU) has plans for all cars manufactured inside the Union from 2022 to feature location-tracking devices so they can monitor speed, driving behaviour and whether motorists are using safety features properly. The EU plans should give impetus to Australian governments to increase advocacy to Original Equipment Manufacturers and international agencies for remote engine immobiliser technology or similar innovations be factory fitted or included as part of the vehicle's security system.

4.5 While this may take some time to filter through manufacturers, there has also been calls to mandate REIs in all new cars sold, 'as governments have previously done with ABS brakes and airbags, thereby creating an impetus for change. *Why vehicle immobilisers could reduce pursuit tragedies* (8:45pm 9 News 26Aug, 2019)

4.6 The Association, as a general principle, supports action to combat illegal or dangerous use of a motor vehicle on the State's roads. A mandate for REIs to be installed in new Queensland private and public passenger and light commercial fleets would be difficult to implement requiring legislation.

4.7 Regardless of the advanced security/safety systems in motor vehicles since 2001, thefts involving the illegal use of motor vehicles on Queensland's roads remain challenging for society, culminating in major repercussions for vehicle owners, consumers, police, insurers and governments. The social cost is measured by the deaths, grief, trauma, injuries, fear incurred by families and justice borne by the community.

4.8 The Association is of the view separate to ADR change and a mandate for an REI to fitted in all new cars, an 'incentivisation scheme' would resonate with many motor vehicle owners to have the REI fitted to prevent the dangerous use of vehicles on the State's roads and the need for police pursuits.

Incentivisation Scheme

4.9 The Association proposes an 'incentivisation scheme' to more efficiently implement REIs. The suggested scheme has four beneficiaries:

- motorist, in the event the vehicle is stolen, would have confidence the vehicle had the technology to allow the police to track and slow the vehicle without having to pursue, avoiding it being wrecked;
- public safety would be enhanced by the prevention of stolen vehicles being driven dangerously on the State's roads and potentially risking lives;
- government's first responders (police, health, transport) lives would not be endangered or health impaired by involvement in or from pursuits; repairs to infrastructure lessened;
- insurers obligations either to write-off vehicles or pay claims for damaged insured vehicles minimised.

4.10 The MTA Queensland would be pleased to work with government and other stakeholders on an 'incentivisation scheme' to achieve the result desired and make our workshops available for any trials of the technology. The Association has worked with TMR on projects which includes the Cooperative and Automated Vehicle Initiative.

Lessons learned from other jurisdictions, particularly regarding the implementation of vehicle engine immobilisation technology to the existing vehicle fleet

4.11 General Motors (GM United States) equipped some 1.7 million of its 2009 model vehicles with OnStar mobile communications system that allowed pursuing officers of a stolen vehicle to request the engine be remotely switched off. The technology had a built in global-tracking device allowing police to find stolen vehicles and with permission of the owner had the ability to have the engine turned off. Police would only be allowed to ask for a shutdown when they had a vehicle in sight. An OnStar operator would inform fleeing suspects that the engine was about to be stopped, which can occur in seconds. Brakes and power steering would still function. OnStar maintains its privacy policies. The system isn't intended to let police use the system on an OnStar owner without their permission.

4.12 OnStar was free for GM owners for the first year after they purchased a new vehicle. Car owners then pay for the service. OnStar stated about 60% pay the fee to continue the service. The commander in the Los Angeles County Sherriff's department summarised the outcome: 'Having enough vehicle owners participating could be problem, 'Until we get enough market saturation, it won't even occur to us to anticipate it.' Such a system has been talked about for years, but law enforcement experts want all manufacturers to participate (*GM will equip new vehicles with a device allowing police to remotely stop them*, Chris Woodyard, USA TODAY).

4.13 The European Parliament passed a regulation to make a range of safety technologies such as intelligent speed assistance and advanced emergency braking system to be mandatory in all cars from May 2022 for new models and from May 2024 for existing models (Media Statement, 16 April, 2019). The regulation also applies to United Kingdom (UK) vehicles.

4.14 Across Australia tracking/location devices are being used by business/industry for efficiency and safety purposes. A range of these after-market technologies are on offer with a variety of plans such a

monthly subscription or rental option which includes standard installation as well as hardware and warranty for the term.

4.15 The Queensland Police Union has demonstrated the REIs effectiveness:

The Queensland Police Union Shows How Cartracks Remote Vehicle Immobiliser Will Help With Police Pursuits. (B-Sure IT Solutions, 26 September 2019)

‘Our partners [Cartrack](#) took part in a first of its kind trial in Australia where remote immobilising technology is being tested to minimize any form of tragedy brought on by police pursuits. The technology works by disabling the accelerator in the vehicle, whilst keeping all other systems active meaning that full control over the vehicle is maintained whilst the vehicle safely decelerates until it has fully stopped. President of the Queensland Police Union (QPU), Ian Leavers, experienced this technology first-hand and believes the system could have multiple benefits and must be made a necessity in the production of new vehicles. For more information on how this technology will work and how it will be utilized by the QPU.’ (There is video with this website.)’

The Commonwealth’s role in relation to vehicle standards and safety, and measures the Commonwealth could take, including requiring all new vehicles to be fitted with remote engine immobilisation technology

4.16 As indicated in 4.2, long term Australian Government policy has been to align the national standards for road vehicles in Australia, the ADRs, with UNECE regulations. The UNECE is acknowledged as the peak international body for automotive standards, reflected in the gradual reduction in road trauma and the continuing improvements in the crashworthiness of vehicles worldwide. The Australian community has derived substantial benefits from an increasingly globalised local vehicle industry, providing a greater choice of safe vehicles. Exported vehicles and parts have also become important to the competitiveness of Australian vehicle and component manufacturers (Department of Infrastructure and Transport, Regulation Impact Statement, Harmonisation of the ADR rules).

4.17 As indicated above, the EU has introduced a regulation for all cars from May 2022 to feature safety technologies including location-tracking devices so they can monitor speed, driving behaviour and whether motorists are using safety features properly. It would seem the emerging safety technologies in EU vehicles from 2022 meets the criteria set out in the Ministerial Council’s communique: ‘as technology advances, opportunities for further work in this space may become possible’ within the framework of the United Nations Agreements that deal with UNECE regulations.

The effectiveness of any proposed measures in improving road safety, preventing crime and assisting police in operational matters

4.18 REI trials in the United States and the Brisbane based Cartracks REI demonstrations of the technology indicate it has the capability to limit or even cease pursuits to the advantage of first responders and public safety.

4.19 The effectiveness of the REI technology in the first instance, rests on take-up. Without a significant ‘incentive’, promotion of the technology as a safety and prevention device, take-up would be limited and not achieve the objective. Privacy issues will also be of concern for some vehicle owners with location tracking devices as has emerged in the United Kingdom and the EU (Daily Mail Australia, ‘How all cars could spy on you like Mercedes by 2022: EU plans could see location-tracking devices fitted in vehicles despite privacy concerns’, 21 August 2019).

A recommended framework for legislative, policy and operational implementation of any proposed measures

4.20 The broad policy architecture, should be developed by key stake holders including Queensland Police, TMR , Insurers, Royal Automobile Club Queensland (motoring public) the MTA Queensland and REI suppliers.

The benefit to and role of insurers in supporting any recommended measures

4.21 MTA Queensland envisages insurers will be integral in working with government and stakeholders to devise and fund the proposed ‘incentivisation scheme’; and to advise customers of the preferred suppliers of the REI technology and the approved workshops for fitment.

4.22 If the ‘incentivisation scheme’ is successful and there is significant take up in the ‘at-risk areas’, the benefit to insurers in the medium term, could be a reduction in vehicles either written off or requiring repair as a consequence of vehicle damage/s from the dangerous use of motor vehicles on the State’s roads. In a nutshell, insurers’ ‘bottom—line’ would be advantaged.

4.23 The NVTRC identifies the at-risk areas (abridged):

Table 20: Top 50 areas for short-term thefts ranked by number of thefts, 2018/19 and 2019/20

| State / Territory | LGA name | Number of thefts | | Theft rate per 1,000 population | |
|-------------------|-----------------------------------|------------------|---------|---------------------------------|---------|
| | | 2018/19 | 2019/20 | 2018/19 | 2019/20 |
| QLD | Brisbane (City) | 2,432 | 2,703 | 1.98 | 2.16 |
| QLD | Gold Coast (City) | 1,498 | 1,684 | 2.47 | 2.71 |
| QLD | Logan (City) | 1,022 | 1,235 | 3.13 | 3.69 |
| ACT | Greater ACT | 853 | 916 | 2.03 | 2.15 |
| QLD | Moreton Bay (Regional Council) | 955 | 881 | 2.08 | 1.88 |
| QLD | Townsville (City) | 693 | 770 | 3.57 | 3.95 |
| VIC | Hume (City) | 756 | 707 | 3.37 | 3.03 |
| QLD | Cairns (Regional Council) | 562 | 619 | 3.40 | 3.71 |
| VIC | Casey (City) | 641 | 552 | 1.88 | 1.56 |
| VIC | Moreland (City) | 480 | 532 | 2.64 | 2.86 |
| VIC | Melbourne (City) | 452 | 495 | 2.65 | 2.77 |
| VIC | Brimbank (City) | 396 | 474 | 1.90 | 2.26 |
| VIC | Greater Dandenong (City) | 524 | 471 | 3.15 | 2.80 |
| QLD | Ipswich (City) | 417 | 468 | 1.95 | 2.11 |
| VIC | Greater Geelong (City) | 421 | 465 | 1.67 | 1.80 |
| VIC | Darebin (City) | 490 | 458 | 3.03 | 2.79 |
| QLD | Sunshine Coast (Regional Council) | 457 | 419 | 1.43 | 1.28 |

Non-Technology options

4.24 The NVTRC, Queensland Police, Insurers, community organisations invest in and promote non-technology options through various motor vehicle security education programs e.g., the Queensland Government’s Vehicle Security Awareness; NVTRC’s POP and LOCK simple message or its Stop Sneak Theft Initiative; the RACQ’s vehicle security advices or its ‘Make your car unattractive to thieves. It seems, the stealing of keys is a major contributor to theft of vehicles:

4.25 NVTRC facts on thefts include:

- In Australia a car is stolen every 11 minutes.
- One in every 120 Australian homes fall victim to car criminals each year.
- Advances in security technology have made it impossible to simply ‘hot wire’ a modern car.
- 70 per cent of cars are stolen with their own keys.
- Half of all cars stolen are taken from the home, including driveways, carports and garages.
- Offenders will sneak into homes, taking advantage of unlocked doors and windows.
- Often the homeowner is present and for this reason, we use the term ‘sneak thefts’ to describe these types of offences. In most cases, thieves will actively avoid coming into contact with the homeowner. In fact, in 95 per cent of incidents there is no confrontation with the homeowner.

- 77 per cent of cars are stolen for short term purposes not involving the vehicle's value which may include joyriding, as a temporary means of transport, or for use in the commission of another crime.
- Car theft is stressful, inconvenient, and costly; and contrary to popular belief insurance does not always cover the cost with victims on average out of pocket \$5,000.

5 Responses to Terms of Reference – Vehicle Standard and Safety in Queensland; Options to improve vehicle standards and safety in Queensland, including in relation to the:

Current Australian vehicle design rules

5.1 An emerging issue is the ease of removal or alteration of speed limiter technology. As this can be done through software updates, apps etc there is no certification, reporting obligation or control measures.

This is a current concern on micro-mobility such as electric scooters and pushbikes. When purchased they are speed limited, however it appears customers are being offered access information that could alter the speed limiter so that it can travel at increased speeds. The increase in speed may be significant requiring a reclassification. These are not registered; able to be ridden by unlicensed riders on footpaths and parked there; the only requirement is a bicycle helmet. Undoubtedly, the safety of riders and pedestrians, alike, is at risk.

5.2 Since manufacturing of motor vehicles ceased in Australia in October 2017, Australia now is an importer of all motor vehicles. The MTA Queensland supports the long-term Australian Government policy to align the national standards for road vehicles in Australia, the ADRs, with UNECE regulations. 'Australia has assented to two United Nations Agreements that deal with UNECE regulations. These are the 1958 Agreement and the 1998 Agreement. Under the 1958 Agreement, a Contracting Party can apply regulations. Applying a regulation gives development and voting rights to the Contracting Party on amendments to regulations. However, when a regulation is applied, the Party must maintain alignment of its domestic standards with the regulation, at least in terms of imported vehicles. Australia has applied 29 regulations and will likely apply more in the future (Department of Infrastructure and Transport see 4.16).'

Inspection regime for registered vehicles

5.3 In Queensland a safety certificate is required if the vehicle is to be sold, or when re-registering it (detailed in TMR's May 2019 Code of Practice, Vehicle Inspection Guidelines). These guidelines require constant review to provide better alignment with the new electronic, technical and safety features in late model vehicles MTA Queensland looks forward to participating in future reviews.

5.4 The Automotive industry has experienced the initial phase of the most significant and transformative transportation change and energy application in its history. To date, electric vehicle technology has been confined mainly to the introduction of hybrid electric vehicles. The Association is of the view that the pre-sale certification scheme needs to be reviewed for the rapid technological advancements in modern motor vehicles. Inspection criteria will need ongoing review to keep pace with technology.

5.5 Consideration needs to be given to the inspection of 'aging' vehicles. There is no definition of 'aging' vehicles or a consistent inspection vehicle policy across the nation's

jurisdictions. In New South Wales (NSW), e.g., motorists in Sydney and Greater Sydney with a vehicle five years or older and needing registration renewal need a Pink Slip – eSafety to be performed by an Authorised Safety Check Station.

5.6 The average age of Queensland cars is 9.9 years (Australian Bureau of Statistics, Motor Vehicle Census 29 May 2020) but, at this point of time, motorists may opt to keep their internal combustion engine vehicles longer than the average age; that is, until the price of non-fossil fuelled vehicles are more competitive. Annual inspections of ‘aging’ vehicles would enhance road safety and environmental protection by demanding repair or removing unsafe vehicles that pose a risk to other road users and the environment.

5.7 Consideration could be given to have the inspections of vehicles as an agenda item for discussion at the appropriate Ministerial Council - if it would be in the national interest to have a uniform light vehicle inspection policy.

Pre-sale certification scheme, including measures to reduce fraud and improve consumer safety

5.8 Odometer fraud is a major issue and while some self-check measures are in place, there continues to be many vehicles with misrepresented odometer readings which adversely impacts the true value of the vehicle. Annual inspections would assist with the frequent recording and potential identification of ‘odometer tampering’

5.9 Currently an odometer reading is only updated on the sale and at subsequent transfers of a vehicle. As extensive periods of time may pass between sales, opportunities abound for anyone to wind back odometers. As said in 5.2 safety Certificates are currently only required on change of ownership or for registration after a cancellation. This could mean that a vehicle has not been assessed for safety or distance travelled through mileage for wide-ranging periods of time.

5.10 A compulsory self-reporting mechanism is needed that requires an odometer reading integrated into each registration renewal process prior to payment being made. Once recorded this should form part of the ‘check my rego’ process currently available to determine when registration is due and show the last recorded odometer reading and date. Within this framework, a process should be developed for when an odometer discrepancy emerges at point of sale/transfer as well as self-reporting. In this instance, the sale or reporting of the odometer reading should not be processed, but flagged in the system similar to a defect notice with a rectification requirement and reported to the appropriate authority. This would be an effective way to capture odometer details on vehicles with a view to making it public thus limiting the incidence of ‘odometer tampering’. This process would make odometer readings more transparent and may reduce the incidence of odometer tampering which is beneficial to any buyer in the process either business or individual.

5.11 Integral in the pre-sale-certification scheme should be a ‘title’ similar to a ‘property title’ being formally attached to a vehicle and a requirement to produce the ‘title’ at point of sale to the next owner of the vehicle. The current registration system is not evidence of ownership. A registered title will require proof of identity and will be evidence of genuine ownership of a vehicle. To be effective a Title scheme would need to be national.

5.12 To be considered as a provider to issue safety certificates, the pre-sale certification scheme requires a more stringent training/accreditation and application approach.

Management of written-off vehicles and 're-birthing'

5.13 A long-term and significant concern for MTA Queensland has been the unsafe return of vehicles classified as "repairable write-off" to Queensland roads without any quality inspections or assessment of the repair work. Backyard repairers are exploiting a loophole, which only requires a Safety certificate, documentation and vehicle Identity check to re-register a repairable write off, creating potential death traps.

5.14 MTA Queensland supports the implementation of a ban on the re-registration of repairable write-offs, with all vehicles assessed as a total loss to be declared as statutory write-offs. This position would ensure:

- elimination of contradictory terminology in regard to 'written-off' vehicles
- greater protection to consumers as 'total loss'
- vehicles cannot be legally rebirthed or registered and many consumers caught with repairable write offs are unaware until they trade the vehicle
- greater control on the quality of repairs authorised by insurance companies through approved repairers according to the Industry Code of Conduct
- improved protection of environment through controlled disposal (by licensed repairers) of fluids, gases and other potential contaminants.

5.15 The controlled disposal of 'total loss' vehicles would eliminate a source of stolen/illegal parts and other related criminal activities. This is the current model of operation in NSW where there is one classification - if a light vehicle is assessed as a 'total loss' it must be written off. A vehicle is a 'total loss' when the cost of the repairs plus its value as a damaged vehicle (its salvage value) is higher than the market value. Written-off light vehicles cannot be re-registered in NSW, except in limited circumstances. The vehicle can still be bought and sold, but only used for parts or scrap metal.

5.16 Failure to adopt a unified national policy gives rise to illicit cross border opportunities for criminals, such as illegal re-birthing practices, theft and sub-quality unsafe repairs. The number of vehicles written off in Qld compared to NSW supports these views: reported to us in 2019, NSW 500 vehicles written off; Victoria 1,500-2,000; and 12,000 in Queensland.

5.17 The Minister for TMR Mark Bailey (Media Statement, 19 March 2021) advised, laws governing repair standards for written-off vehicles would be updated to reduce the number of unsafe vehicles on the State's roads. A Written-off Vehicle (WOV) Scheme had been developed as part of a national initiative to ensure written-off vehicles being re-registered for sale do not contain stolen parts. The changes would come into effect in 2022, and bring Queensland into line with other states.

5.18 TMR recently completed a review of the management of WOV within Queensland which recommended significant changes. In advice to the Association, the TMR indicated these included:

- 'Categorising all light vehicles as Statutory Write-offs with vehicles only permitted to be repaired where they meet specific exemption criteria. A Quality of Repair process and identity inspection would be applied for exempt vehicles (similar to the model operating in New South Wales.)
 - A vehicle may be exempted if it has no non-repairable damage and fits one of the following categories which, may not be exhaustive:
 - Registered in the applicant's name for more than a specified time period before the damage that caused the vehicle to be written off.
 - Inherited in a will or letters of administration
 - Hail damaged, where the individual applicant was the registered operator immediately before the hail event.

- Applications for exemption will be assessed and processed by TMR.

These changes will:

- maintain the roadworthiness and safety of any vehicles that are returning to the Queensland fleet
- further reduce the incidence of rebirthed vehicle activity
- increase consistency with other jurisdictions while improving safety, efficiency and effectiveness
- better protect consumers from substandard repairs and fraudulent activity.'

MTA Queensland participated in the review process and supports the recommendations, we look forward to working with the Government on development, feedback and implementation of the outcomes of the review as a key stakeholder for the Automotive Industry.

After-market vehicle modification framework, including achieving consistency to ensure best alignment with other Australian jurisdictions.

5.19 TMR's 'Minor Modifications -light vehicles -Vehicle Standards G.19.13 – November 2020 (https://www.tmr.qld.gov.au/-/media/Safety/Vehicle-standards-and-modifications/Vehicle-standards/Vehicle-standards-instructions/vsi-minor-modifications-v19_13.pdf) provides a comprehensive after-market vehicle modification framework. The Association supports this framework which in our view aligns with other jurisdictions and the ADRs.

6 The MTA Queensland background

6.1 The MTA Queensland is the peak organisation in the State representing the specific interests of businesses in the retail, repair and service sector of Queensland's automotive industry located in the State.

6.2 There are some 15,000 automotive value chain businesses employing approximately 88,500 persons generating in excess of \$20 billion annually. It is an industrial association of employers incorporated pursuant to the *Fair Work Registered Organisation Act 2009*. The Association represents and promotes issues of relevance to the automotive industries to all levels of Government and within Queensland's economic structure.

6.3 Australia's first automotive hub, the MTA/Q, has been established in specifically designated accommodation at the corporate office. The hub is an eco-system that supports innovation for the automotive industry.

6.4 The Association is the leading automotive training provider in Queensland offering nationally recognised training, covering technical, retail and the aftermarket phases of the motor trades industry through the MTA Institute - a registered training organisation. It is the largest independent automotive apprentice trainer in Queensland employing with trainers geographically dispersed across the State. The MTA Institute last financial year provided accredited courses to in excess of 1,600 apprentices and trainees.

Thank you for your consideration.

Yours sincerely



Rod Camm
MTA Queensland Group Chief Executive Officer