

ASMF-WA

(Australian Street Machine Federation-Western Australian)

1. **Introduction of Committee members**
 - Stan Khose, State Director/Chairman ASMF-WA (Business owner Hicraft Wheelmodz)
2. Our presentation to the committee is in regards to the proposed implementation of the 180kw/Ton rule and the Safe Modification of vehicles.
3. Firstly, I would like to introduce you to the ASMF-WA
The ASMF-WA was formed in 2016 by a group of motoring enthusiasts to provide a representative body to engage with the government and other stake holders on matters relating to the safe modification of enthusiast vehicles, and in particular the vehicles originally manufactured between 1949 to 1984, commonly referred as 'steel bumper vehicles.
4. **Hoons**
I would like to begin this discussion by stating that the ASMF-WA believe that there is a misconception in the broader community that people who drive modified cars are Hoons. As a group, we do not condone Hoon behavior. We fully support all current and future legislation the government implements to change this behavior.
5. **VSB14**
When motoring enthusiast wishes to modify a vehicle, an application is made to the Department of Transport, and such applications are usually supported provided it conforms to (Vehicle Standards Bulletin 14) referred to as VSB14. The VSB14 is a document commissioned and published by the Department of Transport and Regional Services and all States had input into this document. First published in 2006, and a further revision was completed in 2011. This document ensures that any vehicle modifications are done safely. A further requirement of Licensing modified vehicles is that Engineers are engaged to prepare a report certifying that the modifications that are completed in accordance with the requirements of VSB-14 guidelines.

It's a further requirement that the modified vehicles handles' and brakes safely prior to being registered.

In late 2016 we became aware that people were submitting applications that conform to the requirements of VSB14 however they were being rejected by the Department of Transport on the basis, and I quote from an application response letter, **That the modification is too much of a safety risk despite the fact that the replacement engine met the requirements of VSB14 table LA1.**

Upon further investigation with DoT we became aware that the safety risk concerns relate to a Power to Weight ratio of a vehicle that offers minimal occupant protection. We understand that DoT have adopted a baseline of 180kw/tonne, however there has been no explanation of how this figure is arrived at. To offer a comparison with a brand new motorbike that that we can all purchase and has arguably less occupant protection when compared to a modified vehicle, the Kawasaki Ninja, has a power to weight ratio of 550kw/tonne, almost three times the figure being applied to modified vehicles.

The rejection letter is prefaced by the comment, and again I quote, **Department of Transport has adopted VSB14 which is a set of Nationally agreed guidelines however has not been enacted into National Law and therefore the application of VSB14 in any State or Territory is subject to the discretion of the jurisdiction concerned.**

The rejection letters also go on to state that VSB14 was developed prior to 2000 and therefore using engine power figures prior to 2000, however as I mentioned earlier, the first edition was published in 2006 and was further revised in 2011. Clearly, if there were concerns by the VSB14 working group regarding engine capacity, this would have been addressed in the revised document.

The current method of assessment by the Dot whereby apparent conforming applications are being rejected at DoT's inconsistent discretion, is creating a great deal of uncertainty among the enthusiast's community to the point where businesses that rely on construction and modification of vehicles are letting staff go and some are considering closing their doors due to enthusiasts not proceeding with their projects. Average cost of projects is in the vicinity of \$100k-\$200k.

To try and ascertain why DoT have recently changed their adoption of VSB14, we spoke to insurance companies to see whether there had been an increase

in accident statistics with older modified vehicles. Following this investigation we are pleased to report that modified vehicles are well under represented in accident statistics, as evidenced by the much lower insurance premiums for older cars. These insurance companies recognize the lower risk associated with these vehicles, so why cant our government departments recognize it?

In May 2016, the ASMF-WA met with the DoT (Department of Transport) to discuss and present some suggested changes to the VSB-14 which was received positively. Shortly after the meeting, the ASMF-WA received some information that some vehicle builds were being rejected by the DoT due to safety concerns although they do conform to the VSB-14 guidelines.

The ASMF-WA have undertaken research to determine whether the DoT safety concerns are based on fact or opinion. This research is based around actual accident history of vehicles modified in accordance with VSB-14, discussions with registered mechanical engineers and from our own web-based research.

The upshot of our research is that vehicle modified in accordance with the VSB-14 have a significantly lower occurrence of accidents than the majority of roadgoing vehicles. We are therefore of the view the public safety concerns raised by the DoT do not have any factual basis and seek the abolishment of the 180kw/ton rule.

6. ASMF-WA requests

- The abolishment of the 180kw/ton rule as we cannot find any statistical information stating that vehicles manufactured between 1949-1984 are a major problem on Western Australian roads.
- Despite repeated requests, for the DoT to meet the ASMF-WA and discuss why they have concerns and present any statistics to us.
- ASMF-WA to have regular meetings with the DoT to present any proposed safe variations to the VSB14. This will build a strong working relationship between both parties and will build confidence within the industry to employ and grow.

7. Statistics

- According to the MTA-WA website (21/09/2018)
 - Australian National Motoring Industry provides a total revenue of \$251 billion, there is 97,500 businesses that employ 590,000 people paying \$21.6 billion in wages annually.
 - Western Australia there are over 10,000 businesses which accounts for just over 6% of all WA businesses. The industry employs over 70,000 workers and pays \$2.7 billion annually.

- **Centre of Automotive research report 2009 (South Australia)**
 - Detailed analysis shows a dramatic decline in vehicle numbers that are over 30 years old and is a group of less than 0.5%.
 - In a study period of 5 years (between 2003-2007) there were 0 crashes of vehicles that are over 25 years old. Pg. 20 Check

The ASMF-WA represents enthusiasts with vehicles over 34 years old
- **Analysis of Road Crash statistics Western Australia 1990-1999. Report completed in Year 2000.**
 - Vehicles over 20 years involved in all road crashes by crash severity between 1990-1999 equates to 3.5% Check
 - **The ASMF-WA has found that there are strong statistics indicating there is a sharp decline in registered vehicle numbers as their age increases which minimizes their crash involvement.**

- **In the 2018 Motor Vehicle Census, (Australian Bureau of Statistics)**
 - WA has over 2.2 million registered vehicles
 - Average age of passenger vehicles in WA is 10.5 years which is consistent across Australia
 - There are just over 320,000 registered passenger vehicles, or just under 20% that are over 16 years old in WA.

The ASMF-WA represents enthusiasts with vehicles over 34 years old

- **WA Road Safety Commission 2017 Preliminary Summary Road Fatality Report**
 - Fatal Crashes by Speed Zone (Western Australia) Total 161
 - <40km/hr. = 5
 - 50km/hr. = 25

- 60km/hr. = 23
 - 70km/hr. = 15
 - 80km/hr. = 15
 - 90km/hr. = 8
 - 100km/hr. = 10
 - 110km/hr. = 58
 - Not recorded = 2
- 32% or 53 of 2017 WA road fatalities occurred in speed zones of 60km/hr. or less.
- Of the 109 motor vehicle occupant fatalities (22 were not wearing seat belts, 18 were regional WA)
- 26 Motorcyclists (4 not wearing helmets)
- 15 pedestrians
- 7 cyclists (3 not wearing helmets)
- 4 other
- As a contributing factor, Fatigue 16, Inattention 28, Alcohol 35, Speed 50.
- Quick Summary
 - Just under 30% of fatalities (52 of 161) were not in passenger vehicles.
 - 36% of fatalities (58 of 161) happened on regional roads of which 18 were not wearing seat belts. Most motoring enthusiasts wouldn't drive their modified vehicles on regional roads.
- **Vehicle performance and crash risk amongst novice drivers in WA report 2012. Researched by Curtin-Monash University Accident Research Centre, Sponsored by Road Safety Commission of WA**
 - Percentages of vehicles (post-1990) involved in serious and fatal crashes (2001-2008) by performance category and driver age.pg11
 - 4cyl engines 56.2%
 - 6cyl engines 39.4%
 - 8cyl engines 4.5%

- Pg xiii, While it is acknowledged that high performance vehicles have an increased ability to accelerate and maintain higher speeds, speeding and other reckless behaviour among young novice drivers is not confined to those driving high performance vehicles. For this reason, it is recommended that the Government of Western Australia investigate and develop initiatives that target the behaviour of the young novice driver rather than the vehicle per se, in an effort to reduce speeding and other reckless behaviour.

- **The ASMF-WA believes that the DoT has a misconception that any vehicle with a high powered engine is dangerous to the public, yet 56.2% of fatalities are with vehicles having 4cyl. 4.5% are with V8 engines which also encompasses Mercedes Benz, Chrysler, Audi, Ferrari, Lamborghini etc.**

- **WA Road Safety Commission, 2015 Reported Road Crash Report**
 - “Speed related crashes” are those crashes where police recorded speed as a primary crash factor either alone or in combination with other factors, and/or where police record speed as a contributing factor. Police may record speed as a contributing factor, where at least one vehicle is travelling in excess of the

speed limit or at an inappropriate speed for the prevailing conditions.

8. **ASMF-WA requests**

- The abolishment of the 180kw/ton rule as we cannot find any statistical information stating that vehicles manufactured between 1949-1984 are a major problem on Western Australian roads.
- Despite repeated requests, for the DoT to meet the ASMF-WA and discuss why they have concerns and present any statistics to us.
- ASMF-WA to have regular meetings with the DoT to present any proposed safe variations to the VSB14. This will build a strong working relationship between both parties and will build confidence within the industry to employ and grow.

• **Road Infrastructure.**

Inquiry into the National Road Safety Strategy for 2011-2020. Report completed 2018. Initiated by Hon Darren Chester MP, Federal Minister for Transport and Infrastructure in Sept 2017

- PG 16, A high-level global analysis of the business case for safer roads has estimated that Australia would reduce fatal and serious injuries by more than 30% by improving road infrastructure to achieve more than 75% of travel on 3-star or better roads for all road users.
- PG 25, While we can train, educate and enforce road users to make less errors and take less risks, the fact that the system is not well suited to human operation in the first place means that crashes will continue to occur. Even though there are 5-Star rated cars on the road, their ability to protect people is easily diminished if the infrastructure is deficient.
- The report recommends \$3billion/year to be committed to road safety investment. Australia currently spends over \$30 billion on road trauma community.
- PG 39, Australian Defense budget \$40 billion by 2021, Naval ship building currently \$4 billion

- Pg. 42,45, The Cooroy to Curra section of Queensland's Bruce Highway used to be one of the deadliest stretches in the country. It is now one of the safest, moving from a 2-Star safety rating to a 4 and 5 Star following a State and Australian Government funded upgrade. Road Infrastructure improvements have enhanced safety and efficiency on this important transit and freight corridor, with long distance traffic now separated from the locals. The project has delivered both safety and efficiency outcomes: the speed limit has been raised to 110km/hr and an 82% reduction in fatal and serious injuries was achieved in the three years after opening when compared to the Old Bruce Highway before 2010.
- PG 58, Realization that many speed limits across Australian road networks are not conducive to eliminating harm.
- PG 63, 7% of km travelled is on 1 Star rated roads, 28% is on 2 Star roads. More than 1/3rd of fatalities and severe injury can be saved if the National Road Safety Action Plan 2018-2020 achieves the target for 90% of travel on National Highways to be on 3-Star or better roads, and 80% of travel on State Roads to be 3-Star or better. Need funding and commitment.