



VETERAN VINTAGE & CLASSIC CLUB BENDIGO INC. A0007003K
ABN 33 236 457 754

Mr Iain Ross
AOMC
1/3 Edgecombe Court
MOORABBIN VIC 3189

22 November 2013

Dear Iain

Comments on Proposed Changes to Club Permit Scheme

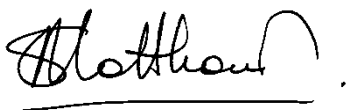
Thank you for providing the extract from a VicRoads document on proposed Club Permit vehicle standards, and for the letter of 22 October 2013 from Rod Amos inviting feedback. We have attached that extract and will address each point by number.

1. Definitions are important. We agree that Street Rods are defined as being on a pre-1949 chassis and Australian Design Rules apply to vehicles from 1 January 1970. The other standards applying to Club Permit vehicles (according to Vic Roads information) are VSI8 for simple modifications to light vehicles and VSB14 for those modified beyond VSI8.
2. We agree with this requirement. It will be necessary to define how to interpret terms like “age appropriate”, and how to calculate engine power increases, etc. We would welcome further consultation on this point.
3. Our scrutineers and club members request that the Club remains permitted to assess vehicles manufactured up to the end of December 1969 for use under the CPS system, in accordance with VSI8 standards or, if the new VSI8A is produced, then to that standard. A full RWC should be required for all other vehicles.
4. We totally agree with this point. It should be the Regulation NOW.
5. We agree that a new Club number plate series should be introduced to identify these vehicles.
6. We accept this condition. We will take 5 photos: each side; front and rear, and from the driver’s position. These will be retained by the Club.
7. Presently, four members can sign to meet VicRoads requirements. Reducing that to two may hinder the process and over-load the enthusiasm of volunteers. Please consider implications as numbers of vehicles and spread of location of those vehicles expand. We would accept that if required but it would be unwelcome. The debatable point in this clause is that Club Secretary and/or Scrutineer

would annually certify that the vehicle continues to be safe: (a) How can this be done when Scrutineers are only capable (under the proposed requirements) to inspect Veteran and Vintage vehicles? (b) If Club Secretaries are to certify that a vehicle is safe, then they should meet the same competency standards as Scrutineers. There may not be enough such people to act as Club Secretaries. In January 2010 this Club signed an agreement that we would take action the first time we became aware that one of our CPS vehicles may not be safe to use. That is good enough. In addition, we do not sign CPS renewals for members who are unfinancial. To certify annually is too onerous on the individuals holding these positions within the Club.

8. Our Club accepts the change in minimum age of club permit vehicles from 25 to 30 years.
9. The new Incorporation requirements will define the constitution of a Club. We recommend that they should belong to a peak body so they are kept up to date with CPS requirements and other developments. Scrutineering requirements for internet-based clubs could be problematic. Cars should be scrutinised by an independent and suitably qualified person. Special quality assurance measures might be required because of a potential lack of contact between club members and scrutineers and the diminished ability to observe those CPS vehicles.
10. Rally cars should be on a separate rally permit scheme with different standards and testing requirements.
11. This is already a VicRoads standard under "Notifying VicRoads of Changes & Modifications to Vehicles". Not only is it in the Regulations, but it is also in the Act. Owner onus applies. It makes sense and should be policed strongly by VicRoads.
12. Commonwealth Government import approval papers should form a part of the initial Club Permit application, and so should Australian safety standards including VSB14 and ADR requirements.

Yours sincerely,



Steve Lottkowitz
Secretary

cc: Mario Cattapan & John Lewis, Vic Roads

Attachments: 1

Extract of VicRoads document**Club permit vehicle standards and requirements**

In light of discussions so far with peak bodies and stakeholders including the Victoria Police, VicRoads is developing detailed guidelines clarifying existing requirements for club permits for consultation with the peak bodies covering:

- Vehicle standards for club permit vehicles (including establishing the extent vehicles can be modified from standard) that are suitable to the era, e.g. , pre 1949, after 1948 and before 1969
- These standards will differ according to age and be “age appropriate” – for example, pre-1949 vehicles will be permitted to have bodywork changes typical of the era without further certification so long as the vehicle’s general appearance is in accord with vehicles of that type with a similar date of manufacture, whereas post 1969 vehicles may only have body modifications in line with those allowed in VicRoads’ Vehicle Standards Information No. 8.
- Inspection standards and arrangement for club permit vehicles (including the possibility of certificate of roadworthiness being required for the initial permit issue for some club permit vehicles, and a more closely defined club “certified” inspection for other vehicles.
- The possibility of a new club permit vehicle “class” of modified club permit vehicle (requiring a “higher level” inspection).
- If a modified club permit vehicle class is to be put in place, it is proposed that these vehicles be identified with a new number plate series.
- Clubs will be required to maintain photographs of vehicles they are recommending for admission to the club permit scheme.
- For renewals or new applications, VicRoads to only accept the signature of the club secretary and/or one designated club permit officer who will be certifying that the vehicle is safe for use on the road and meets the club permit scheme requirements and standards.

In addition to the above, VicRoads will also be considering matter such as:

- Whether to change (with an appropriate transition arrangement) the minimum age of club permit vehicles to 30+ years
- What constitutes a club and whether “internet clubs” will be recognised?
- Clarifying the requirements for the “rally permit” scheme and determining whether rally cars currently on the club permit scheme should be on a revised rally permit scheme.
- Liability of permit holders and clubs to report vehicle modifications to VicRoads
- For non-Australian vehicles without a previous registration history, that Commonwealth Government import approval papers must form part of the initial club permit application.