



23rd May 2014

Leesa Croke
The Treasury
Langton Crescent
Parkes ACT 2600

Email: niisris@treasury.gov.au

Dear Ms Croke,

**Re National Injury Insurance Scheme: Motor Vehicle Accidents -
Consultation Regulation Impact Statement**

1. Introduction

1.1 The Motor Trades Association Queensland (MTA Queensland) responds to the PricewaterhouseCoopers Australia *National Injury Insurance Scheme: Motor Vehicle Accidents* Consultation Regulation Impact Statement (CRIS) call for comments pertaining to this document. The MTA Queensland's comments are on behalf of its constituent Divisions and are confined to issues which relate to the interests of its Membership.

2. Context

2.1 The automotive value chain which is represented by the MTA Queensland in Queensland is not a stakeholder in terms of the National Injury Insurance Scheme (NIIS) or Queensland's Compulsory Third Party (CTP). There is an indirect participation through the franchise motor vehicle dealers and the used car dealers who provide motor vehicle registration when transfer of ownership occurs and therefore simultaneously also sell CTP as a compulsory element of registering an automobile in Queensland.

2.2 The involvement of the MTA Queensland is limited to motor vehicle manufacturing, engineering, maintenance as well as the administration of motor vehicle roadworthiness certification required for statutory compliance purposes as a road safety issue.

2.3 The events surrounding automotive accidents and catastrophic accidents are beyond the purview of the automotive value chain except in the exceptional circumstances where a motor vehicle manufacturing defect or inappropriate maintenance or repair are contributory matters in an accident.

3. Submission

3.1 The MTA Queensland, as an interested and impartial observer in this circumstance makes the following comments.

Motor Trades Association Of Queensland

Address Building 8, 2728 Logan Road **Email** info@mtaq.com.au
Eight Mile Plains Qld 4113 **Website** www.mtaq.com.au
Postal PO Box 4530 Eight Mile Plains Qld 4113 **Tel** (07) 3237 8777 **Toll Free** 1800 177 951

3.2 It is apparent from the CRIS documentation that the significant regulatory impacts of the NIIS will fall upon Queensland and Western Australia. The MTA Queensland is of the view that the level and structure of personal injury insurance caused by catastrophic motor accidents should be determined by the general community, the private users of motor vehicle transport and the Government of Queensland.

3.3 There would be benefit a NIIS harmonising the indemnity provisions of catastrophic automotive injury across the Commonwealth. This would require a consensus among the stakeholders including the States and Territories that this is the desired outcome and should be on the basis that all the stakeholders should be informed of the consequences and costs of such an arrangement. This means the motoring public would have to have their attention drawn to product disclosure statements and to the insurance indemnities that would occur and to the costs that this would incur.

4 The MTA Queensland background

4.1 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 Queensland. In Queensland there are some 14,000 automotive value chain businesses employing in excess of 73,300 persons.

4.2 It is an industrial association of employers incorporated pursuant to the Industrial Relations Act of Queensland. The Association represents and promotes issues of relevance to the automotive industries to all levels of government and within Queensland's economic structure.

4.3 The Association is the leading automotive training provider in Queensland offering nationally recognised training, covering all aspects of the retail motor trades industry through the MTA Institute of Technology (MIT). The MIT is the largest automotive apprentice trainer in Queensland employing 26 trainers based from Cairns to the Gold Coast and Toowoomba and Emerald. MIT last financial year accredited courses to in excess of 1500 apprentices and trainees.

5 Conclusion

5.1 We would be please to provide further comment on any matters in our submission that may require further clarification or amplification.

Thank you for your consideration.

Yours sincerely



KELLIE DEWAR
General Manager
MTA Queensland