
Top Two Motorcycles Submission regarding the ACCC draft quad bike safety standard

We are writing in response to the recent ACCC recommendations to ATV Mandatory Safety Standards. Top Two Motorcycles is a Yamaha and Honda dealership located in Warwick, Queensland. Being a rural dealership, ATV's make up a large percentage of our business, our suppliers and our customers businesses.

If these recommendations, in their current state, are passed as law, Yamaha Motor Australia and Honda MPE Australia will cease selling ATV's in Australia. This, combined with the possible withdrawal of other major branded ATV's from the Australian market, will have a dramatic negative impact on the agricultural industry and those businesses like ours who supply and repair these vehicles.

We are in agreeance with the ACCC that ATV safety needs to be addressed, however, recommendations from the ACCC may cause additional safety concerns and great disruption to multiple businesses.

The main issue with the ACCC's recommendations is the recommended mandatory fitting of OPD's to all new ATV's. Tougher regulations including; mandatory training of a high standard for all ATV purchasers, mandatory use of helmets, banning U16's from operating adult size ATV's and banning

passengers on all ATV's are all measures that could be enforced prior to having to have mandatory fitting of an OPD or manufacturer re-design.

From our personal research, it appears that there is much further research needed to determine the net benefit of fitting an OPD to an ATV.

In addition to the above issues, here are some of the impacts these recommendations may have on agricultural industry and related businesses:

1. Loss of availability of ATV's due to lack of supply
2. Higher costs in either having to source an alternative to ATV'S such as more expensive SSV
3. Day to day farmer operations affected due to proposed ACC changes.
4. Increased safety risk due to operators continuing to use ageing ATV'S due to resistance to OPD'S or lack of availability of ATV'S
5. Increase in ongoing maintenance costs of older ATV units due to resistance to OPD'S or lack of availability of ATV'S
6. Loss of rear rack (unable to carry spray tanks etc) due to proposed OPD device, possibly leading to overloading of front rack therefore posing further safety risks

There have been many changes to ATV safety in the 14 years we have been involved in the motorcycle and ATV industry. Both Yamaha a Honda have implemented measures and

procedures to increase safety awareness on ATV's in recent years.

The increased awareness of safety issues with ATV's has, in our opinion, contributed significantly to reducing deaths caused by ATV's in Australia. This appears to be shown in figure 6, page 20 of the Quad bike safety: final recommendation to the minister.

The ACCC recommendations state on page 5 of the quad Bike Safety: Final Recommendations to the minister that: "option 3 has been developed to minimise disruption to the quad bike market and ensure these vehicles remain available for consumers, many of whom rely on these vehicles for daily work tasks." Judging by the response of Yamaha Motor Australia and Honda Australia (and possibly other brands), this will not be the case.

We appreciate the time you have taken to read our submission.

Kind regards,

Peter and Belinda Lippi

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