



THE ASSOCIATION OF MOTORING CLUBS, INC.

1/3 Edgecombe Court  
Moorabbin Vic 3189  
GPO Box 2374  
MELBOURNE Victoria 3001  
ABN 90 979 750 693

Telephone (03) 9555 0133  
Facsimile (03) 9555 1230  
www.aomc.asn.au  
email: [secretary@aomc.asn.au](mailto:secretary@aomc.asn.au)

The Secretary  
XYZ Car Club  
Address  
Address

16 February, 2009

**RE: Club Permit Scheme:**

Dear AOMC Affiliate Club,

You will be aware of the review of the Club Permit Scheme (CPS) that VicRoads has been conducting over the past three years. This letter is intended to inform clubs of the present state of that review, for while many clubs have delegates attending our quarterly meetings some may not have received details of the updates we have presented to those meetings.

The review has been a protracted exercise due to restructuring and resource/priority issues within VicRoads; indeed, there have been long periods when there has been no activity, but in recent months the review has been progressing toward conclusion.

Many detail changes to the CPS were proposed by VicRoads in two Discussion Papers (2005 and 2006). Of them, the most important proposal was for the current system of permits for club events, maintenance/preparation and "special use" to be replaced by a logbook system allowing up to 90 permitted days of use per year.

At the outset VicRoads sought views from four car club peak bodies: Association of Motoring Clubs [AOMC], Federation of Veteran, Vintage and Classic Vehicle Clubs [Federation], Australian Street Rod Federation [ASRF] and Confederation of Australian Motorsport [CAMS]. The number of CPS-authorised clubs in these bodies can be summarised as follows:

AOMC	<i>approx 200</i>
Federation	" " 80
ASRF	" " 40
CAMS	" " 40

(There is a degree of cross-membership as well, so that some 60% of Federation member clubs are also in AOMC, and of ASRF and CAMS members around 20% and 70% respectively are also in AOMC. (Note; these numbers are indicative as at late 2008)

Of the peak bodies whose input was sought, CAMS has maintained no continuing involvement in the review, although recently some discussion has taken place with them on the matter of historic rally vehicles, which will be referred to later. It is understood, however, that they support the concept of a 90-day logbook system. ASRF has had a continuing level of contact with VicRoads regarding the Street Rod scheme and this has been their conduit in making known their views on the proposals. They have expressed strong support for the logbook concept. The Federation's initial stance was that although they did not support the proposal they would not stand in the way. At various meetings of club delegates in 2006 one

resolution opposing the logbook concept was passed, but at later meetings two motions supporting the idea were passed. A mail poll of 29 Federation member clubs in 2006 saw 51% in favour. The Federation's Committee in referring to the proposals in its newsletter has generally voiced opposition to the proposition.

AOMC has sought to maintain a continuing dialogue with VicRoads over the three years this project has been running. We have put forward proposals and recommendations to refine VicRoads' policy development and discussed detailed issues or questions that have arisen. We have kept AOMC-member clubs informed and elicited their views to ensure that we represent the perspective of the majority of clubs.

Among the issues AOMC has pursued in this process key items have been:

- Recommendation of an alternative 45-day logbook option (at reduced cost) to provide for the more infrequently used vehicles and multiple vehicle owners.
- Recommendation that the definition of replicas be confined to vehicles with specifications identical to an eligible old vehicle. This overcomes the problem of "look-alike" or "in-the-style-of" vehicles comprising modern components which do not have an historic connection and present insurmountable definitional problems. AOMC's view is that the CPS is for historic vehicles and should not extend by stealth to cover other hobby vehicles.
- Approach to modified vehicles. AOMC firmly believes that a censorious or fundamentalist philosophy regarding modifications is unfair, unrealistic and unworkable. Enthusiasts have "improved" their cars in various ways since motoring began and this is part of the motoring heritage we preserve. The blanket application of principles and rules developed for vehicles built to modern technology standards is also impractical –too often they simply don't fit. And the imposition of simplistic and narrow parameters ignores the reality that one size cannot fit all. AOMC believes that an approach is needed that ensures that modifications are considered in the context of the period in which the vehicle was initially used. After all, the standard vehicle is accepted in the context of its time (we are not expected to fit disc brakes to vintage cars, for example) and therefore any alteration, whether by choice or necessity, should also be assessed in that context.

The AOMC proposal is that a voluntary Code of Practice be developed by knowledgeable people within the movement for pre-1969 vehicles to define the nature and extent of modifications which are within the context of its period. That context would be both in terms of historic character and the standards of safety of contemporary vehicles. When developed, such a Code would be subject to ratification by VicRoads technical authorities. This approach will avoid the difficulties of trying to apply current regulations not developed with historic vehicles in mind. AOMC proposes that clubs would be able to choose, at their discretion, to sign up to such a Code in order to authorise conforming modified vehicles onto the CPS. Clubs that did not wish to authorise modified vehicles would therefore not be obliged to do so.

This approach offers a fairer and more practical approach than the previous practice, whereby vehicles with modifications that a CPS-authorized club chose not to authorise on the scheme were passed across to the ASRF for authorisation under the Street Rod arrangements. In many cases the relevant modifications did not in any way render the vehicle a Street Rod. We believe this may also help to resolve the issue of highly modified Rally vehicles. Those subject to relatively less extreme and more period alterations could be recognised in the context of the CPS, while the more seriously altered, featuring newer technology etc., can be accommodated within the appropriate Rally Plate system.

- Recommendations for refinement of logbook entry details to make usage practicable and keep book production costs down, whilst defending against entries made “on-the fly”.
- Recommendation that procedures at VicRoads be devised to ensure clubs have automated access to “their” vehicle data, to facilitate identification of fraudulent misuse of club authorisation.
- Recommendation that vehicle movement within 50 metres of the vehicle’s home address be exempted from logbook requirements. This facilitates car shuffling at the owner’s home.
- Proposals for representation from the old car movement in the VicRoads implementation planning phase, to ensure that a user perspective is brought to the development of processes and procedures.

In addition we have made representations to ensure that the nature of the scheme as a car club-centred scheme, based on the VicRoads principles of vehicle permits-for-use (which underpin the scheme from a legal viewpoint) is not altered, including the stamp duty implications. We have also pressed for a tighter regime of supervision of authorised clubs. A Code of Conduct is one possible means of defending against club behaviour that is not in the interests of the scheme’s purpose to support old vehicle enthusiasts and their clubs.

Toward late 2008 the CPS review was progressing toward its conclusion, with the internal review by VicRoads senior management being undertaken -a key stage in the development of new policy and a preliminary to the preparation of recommendations to the minister.

In October, 2008 members of the Federation’s committee met with VicRoads and put forward a new proposal. This was for a logbook scheme in which club events would be permitted, as at present (without use of a logbook entry) and, in addition, up to not more than thirty days per year would be available by using a logbook entry. This proposal has not been put to a vote of Federation clubs, so it has yet to receive the support of a majority of that group’s clubs, much less of a majority of vehicle clubs in the scheme.

AOMC does not support this idea and a poll of its member clubs in November indicated that over ninety per cent supported the original 90-day logbook proposal (with a 45-day option) over the Federation suggestion. AOMC has expressed to VicRoads its strong view that the original proposal should be maintained.

In AOMC's view the logbook concept, as put forward by VicRoads, is the simplest and most unequivocal in operation, while providing for the most fair and reasonable access to the enjoyment of the historic vehicle hobby.

The idea of a concession in the cost of keeping old vehicles in use on public roads is part of government policy across the world. It is based on a universal recognition that once vehicles reach a certain age their use as day-to-day domestic or commercial transport is not feasible. Further, the cost of maintenance, repair and restoration relegates them to the role of a hobby practiced by people who wish to preserve historic artefacts and enjoy their use as a recreation. Finally, the preservation of transport history by enthusiasts is recognised as an asset to society in qualitative and economic terms.

The principle of a concession is common, but the actual detail of how much cost reduction and in return for what restrictions in use, varies considerably around the world. In Victoria, the concept started nearly fifty years ago by the proffering of a limit to use on car club events by Veteran vehicles of extremely limited useability on modern roads. However, simply because that happens to be the way the initial concession was gained does not present an overriding argument that it should stay there and can never evolve. Indeed, since then the scope for use has been extended significantly in recognition that it was fair and reasonable to allow for later vehicles as they crossed the threshold into the "hobby" category and in recognition that there were other justifiable uses within the context of that hobby.

The way these changes have evolved resulted in some legally awkward and cumbersome procedures and this is a key reason for the proposal to rationalise the situation with a simpler logbook system. As in every other aspect of life, there is always scope for things to be improved; that is progress.

Of course, progress has often been met with some resistance from certain conservative quarters of society; history tells us that the very appearance of powered vehicles over a century ago sparked all kinds of dire predictions. We are here to celebrate the fact that few of them proved to have any substance.

If we wish to observe the wide variety of ways that heritage vehicles benefit from government concessions we can consider the situation in the UK. This is the home of the old vehicle hobby and arguably has the most vigorous and healthy old vehicle club scene anywhere. There the concession is for no "registration" fee to be payable for any vehicle of a certain age (only third party insurance applies) and without any restriction on use.

Closer to home, we can observe that South Australia replaced a "club event only" scheme with a 90-day logbook fifteen years ago. The view of enthusiasts and the car club representative body there is that the change was very beneficial to the health of the movement in that state.

The argument that club events should be the only principle on which a concession should be based clearly does not survive scrutiny.

Similarly, the proposition that if one does not want to submit to the constraint of club events and a very restricted number of other activities then the alternative is full registration is unreasonable and not in the interests of the old vehicle movement. If it is our role of the movement's peak bodies to try to persuade

government to extend privileges to us we should seek to make those privileges work as well as possible for the greatest number as practicable, not the opposite.

AOMC does not believe that the enforcement of club events as an explicit part of a rationed form of use is crucial to the health of the old vehicle movement and its clubs. The South Australian experience is a very good case in point, where, in fact, the change to a logbook scheme saw many new people drawn to the old vehicle hobby because it was seen to provide more access to enjoyment of the hobby.

We see no need to seek to restrict the enjoyment of old vehicles; quite to the contrary, we see it as our role to encourage it. The more enthusiasts are given scope to enjoy the use of their vehicles the stronger the old vehicle movement will be, and therefore the better it can defend against the restrictions, limitations and constraints which governments or pressure groups may wish to impose in future.

We see clubs as the epicentre of the movement. They fulfil that central role by way of the fellowship of like-minded people they foster and the mutual support networks, parts and information sources they make possible. They create the events that form a key part of the shared enjoyment of ownership and use which lies at the heart of our hobby. Clubs survive and thrive on the basis of doing these things. And the movement thrives as they do. Clubs do not need legislation to shore up their role.

But at the core of this issue is whether “personal” use –as opposed to participating with a club group in an organised event- constitutes a legitimate way of enjoying the old vehicle hobby. At AOMC we answer that with a resounding yes! We emphatically believe that it is as relevant to one’s right to enjoy the hobby and as beneficial to the movement for us to have scope for personal enjoyment as it is to join in group activity. To suggest otherwise evokes images anathema to our concept of a free society.

Will the CPS remain a ”club scheme” under the new system? Most definitely. The scheme remains a form of “permit for use “ operated via clubs. Clubs will authorise vehicles going onto the scheme and the renewal of the permit each year. Only members of clubs in the scheme will be eligible to have vehicles on the scheme. And clubs will have the opportunity to set their own parameters for the way they choose to implement the scheme. So, if it is important to a club to lay down any criteria for participation in club activity, or the limits on modification they wish to set, then they may do so as criteria for authorising vehicles. Club rules remain the preserve of clubs.

There has been talk in some quarters suggesting that the changes VicRoads proposes would create a flood of non-enthusiasts seeking to obtain cheap registration. Such scare tactics do not stand to reason. The theoretical cheapness is mitigated by the cost of club membership, the cost and inconvenience of maintaining a decades old vehicle and the sheer impracticality of keeping in use such a vehicle without any element of appreciation for its age and historic nature. Never mind that there still remains the limit to the amount of use permitted. Again, we can look to the test case that we have available to our west. No such abuse has affected the scheme in South Australia or given rise to concern on the part of authorities there. By the way, the South Australian experience is useful on the matter of insurance, too. No increase in premiums resulted from the change there (premiums are lower in SA compared to Vic). Insurers generally base premiums on usage and seldom even ask what form of registration is in use.

In fact the only negative aspect of the experience in SA from which we might learn is that overly restrictive rules regarding modifications have been a continuing source of friction within the old vehicle community. That lesson that has informed AOMC's approach to the issue, as outlined earlier.

It is key to AOMC's view that the provision of a reasonable scope for use of old vehicles is of benefit to the movement as a whole. Our view is simply that relatively more scope for using old vehicles is better than less. Relatively broad opportunities for use will see more old vehicles on the road. That will enrich our transport landscape and encourage community recognition and acceptance of our pastime. These are the very concepts behind the National Historic Motoring Day currently being promoted. Relatively more opportunity for use encourages new recruits to the hobby, because it can be seen to be accessible at reasonable cost. It is well known that regular use fosters better standards of maintenance and conservation of vehicles. Relatively more use of vehicles gives impetus to the suppliers of parts and services and stimulates the maintenance of the disappearing specialised skill sets upon which we depend. And, of course, all these factors tend toward reinforcing and strengthening the role of clubs as the focal point of our interest. It is also true that, by and large, clubs made up of a large number of relatively active users of vehicles are more likely to be effective than clubs mostly catering to owners whose cars are seldom out and about.

It is our clear belief that up to 90 days' permitted use (or 45 for those who choose it) is a fair and reasonable allocation. VicRoads have stated that the cost will be effectively the same as the current charge, plus any extra required to recover the cost of materials such as the logbook itself (and in the region of about half plus materials for a forty-five day alternative). We regard this as reasonable also. It is a refreshing situation to find a government authority presenting a sensible solution, rather than the more usual stinting and circumscribed approach. To turn around and try to prune back such an enlightened suggestion would be an odd response.

The 90/45-day logbook will replace the present scheme which allows for club events, testing and preparation and other personal use, without the present legal grey areas and awkward mechanisms. Let us consider each of those elements.

The permitted days will allow for attendance at club meetings and participation in events, together with other club-related club activities, such as invitations from other groups, attendance at displays etc. without feeling that undue restraint needs to be exercised.

Those other activities associated with maintenance, repair and testing, are also suitably catered for. The cycle of testing, identifying need for work, seeking advice or parts, proving repairs and so on is often spread over a number of days. Bear in mind that even the shortest road time to diagnose or prove a repair comprises a "day's use" in a logbook environment. It is also worth noting that even purchasing petrol on the day it is cheaper, or going to a carwash because you cannot wash at home will constitute use of a day's permitted allocation, no matter how short the actual duration. In light of this, the ninety-day concept emerges as adequate, not excessive.

As we've said, we have no philosophic disagreement with hobby vehicles being used for personal enjoyment. The VicRoads proposal makes it possible to share the pleasure of a hobby vehicle with friends and relatives; to join with a small group in

an impromptu outing; to attend local charity or community events; to extend the time taken to travel to and from club events, or to demonstrate the joys of our hobby to prospective new recruits: all without the need for pre-meditation and formal permission. And when the opportunity arises to enjoy the sheer, simple delight of a therapeutic run in your historic vehicle you can do so. We see no reason why you and your vehicle should not have reasonable access to that freedom.

Remember, the proposal is for up to 90 days use (or 45), it is not mandatory, it just defines the scope.

The old vehicle movement covers a very broad spectrum of different types of vehicle and people. There are vehicles it is not feasible to use very often, and there are those whose dynamic ability means they can share the road without apology to anyone. Likewise, there are people whose primary interest is pride of ownership and who like to take their vehicle out to show it to others on occasion, whilst other people derive pleasure from more active use of their hobby vehicle, in company and alone. Each has a role in our old vehicle community. The prospective changes to the CPS offer a better form of concessional scheme for our automotive heritage, with scope and choice for each of us to enjoy our hobby in our own way

In conclusion, AOMC believes that the 90-day logbook concept, together with the suggestions we have put forward to refine the concept, is the most fair and reasonable way forward to improve the Club Permit Scheme. It also most closely fits with the philosophy of the international body representing the old vehicle movement around the world (FIVA) when they state their main purpose as “keeping yesterday’s vehicles on tomorrow’s roads”.

We trust that your club will give very careful thought to the issues and the points we have put forward. It is important that your response to the final recommendations is informed and reflects the considered views of your members as to what is in the best interests of individual enthusiasts and the old vehicle movement.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Rod Amos', written over a horizontal line.

Rod Amos  
Vice President, Association of Motoring Clubs

PS If you should wish to share this letter with your club members, an electronic copy is available from the AOMC website at [www.aomc.asn.au](http://www.aomc.asn.au)