



Hon Michael Mischin MLC
Minister for Commerce
10th Floor, Dumas House
2 Havelock Street
WEST PERTH WA 6005

PO Box 1544
Coorparoo DC Q 4151
ABN 44 009 664 073
P 1800 RETAIL
F 07 3240 0130
www.nra.net.au

Cc: by email: michael.mischin@mp.wa.gov.au

6 January 2016

Dear Minister

Re: Automotive aftermarket retailers that offer fitting services

The National Retail Association (NRA) is the largest and most representative retail industry organisation in Australia, servicing more than 20,000 stores and outlets nationwide. The NRA is a not-for-profit organisation built on strong relationships with our members.

The NRA exists to help retail and service sector businesses comply with an ever changing and growing regulatory environment. The Association provides professional services and critical information to businesses right across the retail industry, including the majority of national retail chains, as well as thousands of small businesses, independent retailers, franchisees and other service sector employers.

Members are drawn from all sub-categories of retail including fashion, supermarkets and groceries, department stores, household goods, hardware, fast food, cafes and personal services, such as hairdressing and beauty. The NRA has represented the interests of retailers and the broader service sector for almost 100 years, and has the core aim of assisting Australian retail businesses grow.

The Government of Western Australia currently has a business licensing requirement for automotive aftermarket retailers that classifies minor work, such as replacing windscreen wiper blades, as an automotive repair.

It is the understanding of the National Retail Association that the *Motor Vehicle Repairers Act 2003*, and its associated regulations, are presently being interpreted and enforced by the Government in a way that requires automotive aftermarket retailers to hold a motor vehicle repair license to provide basic services such as the fitting of windscreen wiper blades.

This approach is restricting the ability of businesses selling these automotive products to provide important, value-added services to customers. Instead, minor work is being directed to qualified mechanics and automotive tradespersons, which is an unnecessarily expensive and perverse outcome for consumers.

Several members of the National Retail Association have expressed their concerns about this current interpretation.

It is the position of the National Retail Association that considered consultation with all interested parties is necessary to achieve an appropriate outcome to the situation.

Other States have been able to implement appropriate measures following consultation with industry and other relevant stakeholders. Essentially, providing that installation or fitment does not impact the handling, performance or safety of the motor vehicle, there should be no requirement for the work to be conducted by a qualified automotive mechanic.

The National Retail Association would encourage the Government to adopt a similar approach, expand its consultation with industry, and automotive aftermarket retailers in particular, to ensure that a deeper understanding of the restrictions imposed by the current licensing requirements can be established.

The National Retail Association would be happy to consult further with the Western Australian Government on this matter.

I can be contacted directly on 07 3240 0100 or by email at t.evans@nra.net.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Trevor Evans', with a stylized flourish at the end.

Trevor Evans
Chief Executive Officer
National Retail Association