

1 COMMENTS ON THE SECOND HAND CONCEPT PAPER

- a) What is the main focus of the concept paper? Is it on **all** road vehicles or testing of **used** motor vehicles for road worthiness?
- b) Define 'imported used car'. Most SADC Member states trade with each other with regard to used cars.
- c) Scientific and technical backing on air pollution of imported cars is not justified.
- d) Is there any study done on the pollutions from used cars versus used imported cars?
- e) Statistical evidence showing that road traffic accidents are caused by imported used cars is not presented as there are other factors that contribute to road accidents.
- f) Has the concept paper taken into consideration the routine maintenance of the car? Can it be proved?
- g) The concept paper is discriminatory on new vehicles and also it doesn't clearly articulate the origin of imported used cars.
- h) Electronic components that end up in the environment are not only from the imported used cars but are also present in new cars and other electronic devices such as computers and household products

2 BOTSWANA POSITION

- a) In Botswana, specifications (with regards to safety, fuel consumption etc) of 'imported used cars' are equally as good as those bought new from car dealerships.
- b) Generally, Botswana has availability of spare parts of imported second hand cars.
- c) Safety belts and their use are a legal requirement in Botswana.
- d) Enforcement of road safety law is highly implemented as well as public education on road safety.
- e) Implementation of road safety within the country involves various stakeholders including Department of Road Transport and Safety, Botswana Police, Motor Vehicle Accident Fund, Men Sector, Ministry of Education, drivers etc.

3 CHALLENGES FACED IN BOTSWANA

- a) No evidence of service history of most of the imported used cars.
- b) Unavailability of the car manual of most of the imported used cars.
- c) Adjustment of the speedometers on most of the imported used cars.

RECOMMENDATION

Botswana recommends that a criteria for assessing road vehicle inspections and testing for road worthiness of **all** motorized vehicles must be developed and harmonized. This criteria should be performance based and should apply to all motor vehicles to avoid it being discriminatory.