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ADR Harmonisation Review 2024-25

Caravan Industry Association of Australia Input



prepared for

Department of Infrastructure, Transport, Regional
Development, Communications and the Arts
Dr Warren Mundy Review



prepare date

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Working collaboratively with other caravanning associations to benefit the caravan and camping industry



About Caravan Industry Association of Australia

Caravan Industry Association of Australia is the peak national body for the caravanning and camping industry in Australia. Our organisation's vision is, *"To lead and champion a safe, compliant and sustainable caravanning and camping industry in Australia"*.

Caravan Industry Association of Australia operates as a not-for-profit organisation with a membership base comprising the individual state caravanning and camping associations with whom we work collaboratively on industry issues.

One of the key pillars of Caravan Industry Association of Australia is compliance which includes managing our industry accreditation programs, with programs offered for recreational vehicle manufacturers, component suppliers, caravan parks, retail dealers and salespersons.

Caravan Industry Association of Australia is an active representative of our industry in the development of safety standards. We contribute directly to Australian Design Rules (vehicle regulations) development through a seat on Vehicle Standards Consultative Forum of the Department of Infrastructure, Transport, Regional Development, Communications and the Arts. Caravan Industry Association of Australia is also a member of Standards Australia and a nominating organisation to three separate standards committees.

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Executive Summary

Caravan Industry Association of Australia support the processes and policies of harmonisation with international standards, as this typically streamlines approval pathways for vehicle components and technology sourced from worldwide markets. However, the current ADR harmonisation processes seem to be very Euro-centric. An expansion of harmonisation to other regions, where suitable standards can be identified, would assist industry innovation and development.

There are some unique Australian conditions that need to be considered in any harmonisation process. In some circumstances international standards may need to be varied or amended in order to protect and provide for areas where there are distinct Australian contexts and products.

Second Stage manufacture, reflected within Caravan Industry as Motorhome manufacture, has some unique implementation issues associated with ADR changes and adoptions. Long lead times for vehicle delivery, arising from our remote geographical location, and the limited negotiating power as small volume customers of large base-vehicle manufacturing businesses cause significant challenges for SSM manufacturers in achieving applicability dates for new/revised ADRs. Any attempts to reduce implementation timeframes for ADR revisions will exacerbate the problems. A review of applicability dates is recommended, with a proposal to extend implementation timeframes on SSM vehicles.

Our Views

Benefits of Harmonisation

The harmonisation of international standards is generally agreed to be a positive measure for Caravan Industry businesses. Road vehicle technology and components used in Recreational Vehicles are commonly sourced from overseas or multi-national companies, so harmonisation with overseas standards provides an opportunity to streamline the introduction of such components into Australia while maintaining vehicle safety.

The caravan industry is a considerable contributor to the Australian economy, however considered from a worldwide perspective our industry is a small proportion of the market. The ability to adopt components and technologies meeting overseas standards assists with industry innovation by providing a pathway that ensures vehicle safety while avoiding the need for costly re-engineering and/or testing of unique component variants.

Challenges with Harmonisation

The current ADR harmonisation focusses almost exclusively on UN ECE regulations. Obviously, this is a benefit for components and technologies originating in Europe or designed for that market. However, there is currently very limited harmonisation with standards in other areas, for example United States of America and Canada. This drives prohibitive costs into the introduction of technology or components developed for those markets, limiting innovation and restricting supply chain opportunities for Australian businesses. Caravan Industry Association of Australia recommends a broader approach to international harmonisation, considering expansion to other comparable standards. This will assist Australian businesses in sourcing reliable, proven technology and components worldwide.

Unique Australian Conditions

Another challenge for harmonisation with international standards is unique conditions that exist within the Australian context. Primary among these is the acceptance that road conditions are more harsh in Australia, and that road vehicle users are more frequently exposed to these harsher road conditions. This is evidenced by ADR 62 Mechanical Connections Between Vehicles, which has very limited alternative standards provisions and largely remains a unique local standard, ensuring that an adequate strength of trailer drawbars and tow coupling connections is achieved for local Australian conditions.

Australian recreational vehicle travellers predominantly spend their time in regional and rural areas, which inherently involves longer drives, poorer roads and builds a demand for durable, self-sufficient features in recreational vehicles. In response to this, Australian recreational vehicles have evolved distinct designs compared to those from other international markets - especially those originating in Europe. This is particularly evident in caravan and camper-trailer segments, where robust designs and additional features are prevalent. The variety of recreational vehicle styles and features of such products frequently create challenges in applying harmonised regulations, due to the unique nature of the product. As an example,

ADR 13 Installation of Lighting and Light-signalling Devices on other than L-Group Vehicles is a complex regulation to correctly apply on the variety of products in the Australian fleet.

While supporting efforts to harmonise with overseas standards where possible, Caravan Industry Association of Australia strongly recommends that ongoing harmonisation is balanced with consideration of the local Australian market factors and their effect on regulations.

Second Stage Manufacture - Motorhomes

Recreational Vehicle Motorhomes are predominantly put to market under Second Stage Manufacture (SSM) Approvals. This involves the construction of a motorhome as a second-stage build on an approved base vehicle (usually a cab-chassis product). There are some distinct issues for SSM manufacturers arising from the current ADR implementation policies.

Applicability dates for new or revised ADRs make no distinction between a first-stage or second-stage manufactured vehicle. This creates a situation where revisions are typically implemented in first-stage (base) vehicles in time for the implementation date, but without allowing any additional lead time for SSM customers. Given the remote geographical location of Australian manufacturers, the lead times for delivery of base vehicles are lengthy – typically several months. On top of that is the necessary production lead time for the SSM build.

Australian motorhome SSM customers represent a tiny proportion of the overall sales of base vehicles – typical suppliers include Mercedes, Iveco, Renault, Toyota. In this context there is very limited opportunity to negotiate for timely builds of vehicles, which can result in delays for SSM builders while they await the supply of updated base vehicles. This forces a blackout period in which SSM manufacturers are prevented from supplying motorhomes to market due to the unavailability of eligible vehicles. In one recent example an SSM manufacturer faced at least a 9-month wait until vehicles that met the requirements of a new ADR would be provided by their base vehicle manufacturer.

These challenges exist under current ADR processes and are expected to be exacerbated by any reduction in implementation timeframes for ADR revisions. In order to assist SSM manufacturers with ADR changes, Caravan Industry Association of Australia strongly recommend that ADR implementation processes are altered to include an additional implementation time for vehicles put to market under SSM approvals.

Further Contact

Caravan Industry Association of Australia representatives are available for further discussion or expansion of the points raised in this submission. Please direct any queries to:

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