

Caravan Council of Australia

Dear Sir/Madam:

re: **Response** by the **Caravan Council of Australia** on the **MVSA 1989**, in relation to **Recreational Vehicles (RVs)**... especially
Caravans and Camper-Trailers (Towables)

Please find attached, the response from the *Caravan Council of Australia* for the *Review* of the *MVSA 1989*.

The response is restricted to Recreational Vehicles (RVs), and in particular to "towables" - caravans and camper-trailers - that are legislated under *VSB-1*.

The *CCA* is completely **independent** (from manufacturers, importers, dealers and all other bodies), and while also providing technical assistance to *everyone*, is primarily concerned with assisting RV owners and potential buyers. As such, the *CCA* hears of the many problems - both major and minor - in the field, and is able to provide professional engineering assistance. The response covers the vast majority of issues and concerns from all sectors of the industry.

The *CCA* endeavours to enhance the image of the RV industry, especially in the areas of Compliance, Safety, Quality and Professionalism.

There are many serious problems in the field, and too many accidents and nasty incidents on the road involving caravans.

More stringent enforcing of the current legislation is needed, especially when caravans and camper-trailers are presented for registration.

More education - and preferably mandatory licensing of *all* sales personnel - is required, in the crucial areas of Compliancing, Safety and Consumer-Protection responsibilities.

The attached 4-Part Buyer-Assist... "*Evaluation – Comparison – Contract – Inspection*" is certainly *starting* to have its desired effect - as is the *ACL* - in this regard.

"*Ratings & Masses*" are sorely misunderstood -or ignored - by many people. Legislation should be amended to better define the various terms.

While there are indeed many fully-professional and highly-respected RV manufacturers/importers and dealers, the industry is badly tarnished by others that are far from being of the same calibre.

Please contact the writer if you require any further information (that of course is *not* of a confidential nature).

Yours truly

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{Member: IEAust; SAE; IAME}

(General Manager & Professional Automotive Engineer)

Caravan Council of Australia

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Attachments: (Caravans & Camper-Trailers)

- } *VSB-1 Compliance* Check-list & *Quality Assurance* Check-list
- } "Ratings & Masses" Explanation... {Included in the Response}
- } 4-Part "Buyer-Assist" - *Evaluation – Comparison – Contract – Inspection*

CCA Charter:

The *Caravan Council of Australia*, registered with ASIC, assists the local Recreational Vehicle (RV) industry.

This applies to both ***Australian-made*** and ***Imported*** Recreational Vehicles, and Dealers and Owners, as well as potential Buyers.

Compliance, Safety and ***Quality*** are the prime areas of interest and action.

The CCA is *not* involved in (but will support) State Association issues, or lifestyle-promotion activities.

"Recreational Vehicles" include Caravans, Camper/Tent Trailers, Motorhomes, Camper-Vans, Slide-Ons, and 5th-Wheelers

The CCA also offers the same services to manufacturers and importers of Horse Floats and Boat Trailers.

Charter: The prime ***Aim*** is to best ensure a "level playing field", in that *both* locally-manufactured and imported RVs are fully compliant and of acceptable quality, so that RV buyers can have confidence in the vehicles that they purchase.

Objective: To enhance the image, and improve the professionalism, of the RV Industry.

To best ensure 100%-compliance and high-quality of all marketed RVs.

Services: Technical and commercial assistance, concentrating on *Compliance, Safety & Quality*

Purpose & Operations:

Enhance the level of: **Compliance; Safety; Quality & Professionalism** in the Australian RV industry.

- Liaise with, assist, and promote all recognized Australian Caravan Clubs
- Assist owners and potential owners of Caravans and Camper-Trailers when *purchasing*
- Assist owners of Caravans and Camper-Trailers with *technical and warranty problems*
- Assist in developing and adopting *new technologies* for Recreational Vehicles

- Liaise with *government and regulatory bodies on relevant legislation and issues*
- Liaise with the *media on relevant legislation and issues*
- Promote *training in all areas of the Caravan and Camper-Trailer industry*

Assisting RV Manufacturers, Importers & Dealers

- **Compliancing** – *Australian Design Rules & Australian Standards*
- **Quality Assurance** – Document Preparation & Auditing
- **Design & Testing** – especially Handling & Stability
- Vehicle Inspections & Mediation
- Technical Assistance - *Expert Witness* - with Legal Matters involving RVs
- The first No: 1 aim is to ensure all RVs are 100%-Compliant, and as safe as possible.
- The second No: 1 aim is to ensure all RVs are professionally designed and manufactured.
- The third No: 1 aim is to ensure all RVs are of the highest possible Quality.
- The fourth No: 1 aim is to ensure all RVs are in strict accordance with the buyer's Contract.
- There are extremely strict *Consumer-Protection* requirements.
- RVs *must*: Be *fit-for-purpose*; Be of *acceptable quality*; Be as *advertised* or promoted;
- There are extremely strict *Product Recall* responsibilities.
- Recalls and litigation can be very expensive and highly damaging to the reputation of affected manufacturers.

Assisting RV Owners & Potential Buyers

- 1: Assisting potential owners in selecting the best-value and best-quality compliant RV.
- 2: Ensuring that the *Contract* for purchasing a new RV is technically and commercially OK
- 3: Ensuring that a *new* RV is technically and commercially OK before accepting delivery
- 4: Ensuring that a *used* RV is technically and commercially OK before accepting delivery
- 5: Assisting owners - *Expert Witness* - on technical issues with legal matters involving RVs... manufacturing, quality and warranty issues
- **Compliant** – Strictly made to all *Australian Design Rules & Australian Standards Ratings & Masses* – Correct, and legal and suitable for the Owner's tow-vehicle
- The second major specific area of assistance is to ensure the Owner's RV is made to the exact requirements of the *Contract*.
- The third major specific area of assistance is to ensure the Owner's RV is designed and made in accordance with recognised engineering practices.
- The fourth major specific area of assistance is to ensure the Owner's RV is made to the expectation of high standards of *Quality*.