

Consultation Paper on the Motor Vehicle Standards Act 1989

Submission by The Caravan, Camping & Touring Industry & Manufactured Housing Industry Association of NSW Ltd

The Caravan & Camping Industry Association of NSW (CCIA) and the Manufactured Housing Industry Association of New South Wales (MHIA) comprises over 640 members drawn from owners and operators of caravan and holiday parks, manufactured home estates, manufacturers, dealers and retailers of manufactured homes, caravans, motorhomes, camper trailers, camping equipment and accessories and the service industries.

Motorhomes, campervans, caravans, camper trailers, tent trailers and fifth wheelers are referred to as recreational vehicles (RVs). Currently there are around 400,000 registered RVs in Australia. The popularity of these vehicles is growing rapidly, with new registrations of around 20,000 units every year with an estimated 80,000 RV travellers on the road at any one time.¹

Our members are located in all parts of New South Wales (NSW). There are approximately 133 recreational vehicle wholesalers and retailers of motorhomes, campervans, caravans, camper trailers, tent trailers and fifth wheelers within NSW.

The geographical breakdown of these businesses is as follows:

Region	Number of Businesses
North Eastern NSW	43
North Western NSW	2
South Western NSW	11
South Eastern NSW	77

The public policy objectives of improving the safety, environmental performance and security of road vehicles in Australia under the *Motor Vehicle Standards Act 1989* (the “Act”) are supported by the CCIA/MHIA. There is sufficient capacity in the current legislation to achieve these objectives, however there are significant issues around the implementation of these objectives,

¹ National Caravan and Recreational Vehicle Towing Guide, 5th Edition.

which can be addressed through non-legislative means. An improved procedure for inspections to ensure compliance with the Australian Design Rules (ADRs) is needed, particularly in relation to the importation of trailers.

RV manufacture in Australia continues to grow in terms of size, operations and product sophistication, which is in contrast with many other areas of manufacturing. As an important contributor to the caravan and camping tourism sector (which also continues to grow) high quality vehicles (local or imported) are an essential part of ensuring a safe and enjoyable experience. However, weaknesses in the current regime are enabling non-compliance, which threatens consumer safety, fair trade and industry reputation.

While all products are required to fully comply with the ADRs, the Federal self-certification system in relation to trailers under 4.5 tonnes (local and imported) coupled with varying State requirements for registration, does not always guard against non-compliant products. A separate category of concessional importation for trailers should be maintained, however self-certification creates an opportunity for non-compliant product to be manufactured/imported and then registered in the States without an independent assessment that such a product actually complies with the ADRs.

As such, the CCIA/MHIA is supportive of a higher level of departmental scrutiny and inspections of trailers, rather than relying on materials supplied by manufactures/importers. The CCIA/MHIA is also supportive of the submission by the Caravan, RV & Accommodation Industry of Australia Ltd (CRVA) for consultation with peak industry bodies on relevant compliance issues and on registration related matters.

While the CCIA/MHIA supports harmonisation of the ADRs with international standards for the purpose of reducing regulatory burdens and improving market competition, this should not be done at the expense of consumer safety. As submitted by the CRVA, the ADRs for trailers have more relevance in relation to the creation of a safe road network than simply adopting international standards. Critical differences between international standards and VSB1 include the requirement for safety chains, safer wiring materials and a single tow ball size.

The position of the CCIA/MHIA is that the Registered Automotive Workshops Scheme (RAWS) supports the main policy objective of road safety by ensuring that the bulk of vehicles entering Australia are keeping up with technological developments. It has also contributed to the

appropriate balance between segments of the automotive industry; however improvements need to be made to better regulate the first supply of used imported vehicles. The potential for non-compliance and safety problems in pre 1989 RVs is high. While they do not form a great percentage of imports, many aspects of used RVs, particularly from America and Europe, are unsuitable for Australian conditions and standards. Length, wiring, plumbing and even the positioning of doors are problematic. Concessions from the ADRs are not suitable for imported used RVs pre 1989 and they should be specifically excluded.

In fact, fewer or no restrictions on the importation of used (or new) RVs is not something that is supported by the CCIA/MHIA. While we are an Association concerned with protecting our industry and those we serve, consideration of consumer safety is an integral part of this responsibility.

In closing, the CCIA/MHIA is of the view that there is sufficient capacity in the current legislation to achieve its objectives; however the implementation of the legislation requires improvement in terms of inspection and verification in relation to RVs. As a growing market, consideration of the RV sector is becoming more significant to the objective of improving the safety, environmental performance and security of road vehicles in Australia.

We are available to discuss this submission in further detail, and look forward to our involvement in the consultation process related to the review of the Act and Regulations.

Yours sincerely,



Lyndel Gray
Chief Executive Officer