

## Submission 52 – RVS Legislation Consultation

### CARAVAN INDUSTRY ASSOCIATION OF AUSTRALIA

SUBMISSION IN RESPONSE TO THE  
2018 PUBLIC CONSULTATION ON THE NEW ROAD  
VEHICLE STANDARDS LEGISLATION

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## Executive Summary

Caravan Industry Association of Australia welcomes proposed changes to the existing Motor Vehicle Standards Act which has been in place for nearly thirty years and will modernise and strengthen the laws governing road vehicles including caravans and RV's in new Road Vehicle Standards Vehicle Standards legislation (RVSA). Our industry has been waiting for over four years for this legislation and trust that after this formal consultation process concludes, the legislation and ensuing regulations are implemented expeditiously so that, the government's aim of fully implementing the Act, after an initial 12-month transition period, by the middle of 2020 is achieved.

Caravan Industry Association of Australia is particularly pleased that the RVSA includes tougher measures in getting RV product onto the road for manufacturers, and far reaching penalties for businesses not adhering to their compliance obligations. We also strongly support that the powers within the bill will apply to all road vehicles, supplied in Australia, regardless of origin.

Another key component is the introduction of the Register of Approved Vehicles, an online, publicly accessible database of vehicles approved for supply in Australia. This will be a huge deterrent in the supply to market of stolen or re-birthed RV product.

There are however three additions that the Caravan Industry Association of Australia would strongly urge the government to consider:

1. Allowing access to De-identified datasets to be available for caravans, camper trailers, campervans and motorhomes with a specific focus on first time vehicle registrations of vinplates and reregistration's of vinplates (change of ownership) both from the proposed new publicly searchable Register of Approved Vehicles database, the existing NEVDIS National Database and the Register of Written off Vehicles. Such access would allow the cross reference the approval information to what the product physically is. On a broader scale it would also enable better understanding in terms of the development of the industry and the trends influencing it and would provide better future planning outcomes.
2. Adding an additional category to the new publicly searchable Register of Approved Vehicles database. The database as currently outlined at the recent public consultations is due to have three separate categories.
  - a Birth Certificate (when a vehicle is registered for the first time);
  - a Marriage Certificate (when a vehicle is purchased);
  - and a Death Certificate (when a vehicle is written off or is no longer to be in use).

Caravan Industry Association of Australia would argue that an extra category is needed for when a vehicle has had more than minor modifications made to it.

3. Greater clarity for when importers of light or heavy trailers would use the Specialised and Enthusiast vehicles (SEVs) pathway, particularly as regards to the importation of variant models on models that a manufacturer already sells in the Australian market, rather than under current arrangements. We would like further guidance as to when a business would choose to use a SEVs pathway to import motorhomes from Europe or the United States? For example, products such as Swift Motorhomes imported from the UK will usually carry either a SSM label or a green nonstandard approval label. Will these products now go through the concessional pathway (SEV) or will they need to apply for Type Approval? Who would hold the type approval in this instance – Swift Motorhomes in the UK as the manufacturer or the importer/ dealer in Australia selling the product?

In the section marked Questions Seeking Answers we are also seeking further clarity in regard to:

- Component Type Approvals (CTA's)
- Used (but unregistered) buses
- Physical Trailer Plates

## Background

In our 2014 submission for the REVIEW OF THE MOTOR VEHICLE STANDARDS ACT 1989 we noted that the “Australian caravan and recreational vehicle (collectively ‘RVs’) manufacturing industry (RV industry) stands in stark contrast to the local automotive manufacturing industry. The RV industry in Australia manufactures approximately 21,000 units each year into a total fleet of 528,869 RVs (as at 2013). Kilometres travelled in RVs around Australia are growing steadily and RV ownership is expected to continue growing over the next twenty years at a rate which exceeds current annual growth of 5 percent.”

Since 2014 Caravanning and camping has remained a dynamic and growing industry within Australia, which provides positive impacts through regional dispersal, job creation, affordable housing, and social connectivity.

The number of caravans and campervans on Australia’s roads has continued to steadily increase over the last six years and at their highest production levels in over 37 years. Combined registrations of caravan and campervans peaked at a record high of 647,319, which included 583,770 caravans and 63,549 campervans, for the year ending January 2017, 70% of which were manufactured in Australia.

Caravan Industry Association of Australia continues to take its stewardship of the industry seriously. Our RVMAP program is symptomatic of this. The RVMAP is a voluntary program developed to ensure that an accredited manufacturer, distributor, packager, importer or retailer of any product adheres to all relevant Australian Design Rules and Federal Compliance Regulations. Businesses which have complied can then display an RVMAP accreditation key on their products to give consumers the confidence in knowing products from these businesses are regularly inspected against a commitment to consistently supply product that adheres to all relevant Australian Design Rules and Federal Compliance Regulations.

The establishment and development of the RVMAP program evidences Caravan Industry Association of Australia’s recognition of the importance of impeccable compliance as the foundation of an industry reputation for high standards of safety and quality for consumers. There is often a need to defend the program within industry when local manufacturers are aware of the high level of imported RVs that seem to avoid compliance requirements and associated input costs. Caravan Industry Association of Australia therefore welcomes the government’s commitment in the RVSA to apply the same level of regulation to locally manufactured and imported trailers and caravans. We also strongly support its clarifying the requirement for audit access to all stages of production, including manufacture of components covered by a Component Registration Number or Sub-Assembly Registration Number. However as can be seen in the Questions Seeking Answers section we do have some questions regarding components in light trailers.

Caravan Industry Association of Australia has also long held concerns regarding certification requirements for trailers under 4.5 tonnes Aggregate Trailer Mass. The decision to change the process under the MVSA where trailer manufacturers were able to simplify self-certify a trailer as compliant with the guidance contained in the Vehicle Standards Bulletin 1 (VSB1) to a system under the new RVSA whereby trailer manufacturers supplying more than four vehicles to the Australian market in a 12 month period need to register with the Department and obtain a type approval for that model of trailer and that any approval will be subject to the same conditions as any other vehicle type approval, (i.e. requirement to be able to provide access to manufacturing and design facilities), we believe is a significant step forward in modernising and strengthening safety standards in our industry.

The streamlining of provisions whereby heavy trailer manufacturers will be able to utilise a Model Report (MR) to allow a single assessment by the Department is also a sensible and more efficient way of gaining type approvals.

We also warmly welcome the government's commitment to compliance with and enforcement of, RVSA obligations supported by enhanced monitoring and investigation powers, and new enforcement tools particularly providing the Minister with a separate power of recall to the ACCC where locally manufactured and imported trailers and caravans do not meet Australian vehicle standards rules.

### Register of Approved Vehicles (RAV) database

Caravan Industry Association of Australia supports an online, publicly searchable database of vehicles approved for use on Australian roads on the basis that consumers have a right to be fully informed regarding the product they are purchasing. However, we believe the government should go further and introduce an extra category for when a vehicle has had more than minor modifications made to it. This would introduce further transparency and give consumers the confidence that what they purchasing has not been significantly modified without their knowledge.

The Association is also supportive of the RVSA's provision that "a permanent Vehicle Identification Number (VIN) will continue to be required on road vehicles supplied to the Australian market." Also, that as well as being entered on the RAV, trailers will retain the existing physical trailer plate due to the need for visibility of load limits. However as can be seen in the Questions Seeking Answers section we have a question regarding whether the government will be introducing a standardised Trailer Plate for this purpose under the reform.

### Questions Seeking Answers

**Component Type Approvals (CTA's):** It is our understanding that CRNs and SARNs will be combined as CTAs. With the RVSA requiring light trailers to have type approval does this also mean that their components (couplings, brakes, suspension) therefore also require CTAs? Or will a demonstration of compliance be sufficient if they do not apply for or carry a CTA?

**Used (but unregistered) buses:** It is our understanding that those which have been imported to be converted into motorhomes are currently able to get approval through RAWs. Is it therefore correct to conclude that under the RVSA this will no longer be possible?

**Physical Trailer Plates:** We are supportive as an industry of the provision that trailers will continue to be required to display a physical trailer plate in addition to having the information entered on the RAV. However, will the Federal Government be introducing a standardised Trailer Plate for this purpose under the reform? Or as is currently the case, will manufacturers still be able to source their own Trailer Plates individually leaving the flexibility to place optional and additional information on the plates at the discretion of the manufacturer? Many trailer manufacturers already combine the “tyre placard” information into the trailer plate – so this would also need to be considered if a legislated and uniform plate were to be introduced.

## Who We Are

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

Our stakeholders range from manufacturers and retailers of industry products, caravan and holiday parks, suppliers of goods and services, and service providers across the entire supply chain. Many of these industry businesses financially support our organisation by voluntarily making a contribution towards a cooperative fund that aims to grow the market and support the sustainability of the greater industry. In addition, we communicate regularly with consumers who have an interest in caravanning and camping and have an online active database of over 313,000 consumers, and social media sites which number more than 115,000 participants.

Our organisation's vision is "to lead and champion a robust, compliant and sustainable caravanning and camping industry" in Australia, with all operational pillars – marketing; research; lobbying and advocacy; compliance, accreditation and training – working towards this vision.

### Value of the Caravan Industry to the Australian Economy

The caravanning and camping industry is significant in Australia as evidenced by the following fast facts:

- \$8.6 billion of visitor expenditure is generated every year by caravan and camping consumers.
- 12.1 million caravans and camping overnight trips were taken in Australia last year.
- 56.5 million nights were generated around the country by caravan and campers.
- 53,000 direct employees within the industry and 5000 businesses.
- \$1.8 billion of revenue is generated by caravan parks annually.
- 70% of Australians have visited a caravan park or campground at least once in their lifetime.
- 21,841 recreational vehicles were manufactured in 2016, the second largest year of manufacturing in 37 years.
- 647,319 RVs are registered nationwide and is the fastest growing vehicle type in terms of registrations.
- 79% of the Australian population have a positive purchase intention to a caravan and camping holiday.
- 90% of all caravan and camping holidays are in regional Australia.
- 91% of caravan and camping trips in Australia are undertaken by Australians, although 20% of expenditure is created by international visitors in the segment.
- In the last two years, 7.1m Australians have stayed in a caravan park or camp ground.