

Bill Thiel 6.10.14

Motor Vehicle Standards Act 1989 Review MVSAreview@infrastructure.gov.au

Submission in response to the MVSA 1989 Review by Dometic Australia Pty Ltd.
Dometic has been involved in the Caravan Industry for xx years and is involved in the supply and service of electrical and gas appliances to the caravan industry for more than 50 years in Australia.

I have observed many examples of caravans , camper trailers fifth wheelers and motor homes which have been imported into Australia that are clearly not compliant with the National Standards **for electrical and gas safety** and Australian Design Rules (ADRs) which apply to domestically produced recreational vehicles **and which are required to be electrically and gas approved by act of parliament.**

Imported vehicles often fail to meet Australian standards for Electrical and Gas safety. Not only do some vehicles fail to meet the Australian Standard, some vehicles bare all the hallmarks of a “dumped product” and fail to meet even basic safety standards.

Electrical safety standards for appliances and installations are prescribed in the Electrical Safety Act.

Gas safety standards for appliances and installations are prescribed in the gas safety act and listed in AS3645-2010 and AS5601

Electrical Safety.

Australian wiring rules governing safety in recreational vehicles and relocatable buildings are considerably more onerous than other countries. See AS/NZS3001

The differences include quality of cable, type of connections, compliance and quality of Switchboards, ICBO's and fittings which are often substandard, dangerous and contravene AS/NZS3000 and other Australian Standards.

EnergySafe Victoria video link to safety in installation.

<http://www.youtube.com/watch?v=VsJt8fP902U>

Gas Safety

Australia bans many gas appliance and RV configurations which are commonly used in other countries.

These are banned because they are potentially deadly.

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Australian Standard AS5601 requires gas appliances to be flued to outside to prevent death from carbon monoxide.

Europe allows UN FLUED gas heaters, hot water systems, refrigerators and other appliances, to run inside caravans.

Carbon monoxide kills.

Link to Carbon Monoxide advertisement from EnergySafe Victoria.

<http://www.youtube.com/watch?v=VsJt8fP902U>

Pipe and appliance safety

Australia requires RV and relocatable buildings to use copper pipe to Australian Standard AS1432

Other countries allow composite pipe (subject to rodent attack) steel subject to corrosion, and plastic covered aluminium. (subject to mechanical damage and corrosion)

In my experience, which dates from 1975 to current, Australian Standards which are often breached in imported Caravans and Motor homes are:

AS4618 Gas pressure regulators

AS4555 Gas refrigerators

AS4551 Gas cooking appliances

AS4552 Gas water heaters

AS3000 Wiring rules

AS3001 Wiring rules for transportable structures.

In summary the proposed process of harmonisation is seen as diametrically opposed to the current efforts of Government bodies such as EnergySafe Victoria, Queensland Gas Association, Gas Technical Regulators Committee, Mine Department WA, who are working to create a safe and regulated system for the use of gas and electricity. Harmonisation will amplify the already growing number of importers who are attempting to circumvent the laws and are placing dangerous gas products and installations in our country.

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The current self-certification system for the import of RVs (as small trailers less than 4.5 tonne) should be amended. These imports should be independently inspected for compliance with ADRs, prior to final import approval. Further, compliance should be enforced.

It is important to industry efficiency and productivity that a new harmonised pre-registration compliance and enforcement regime be developed with industry input and introduced by Federal and State registration bodies / regulators. Such consistency will provide national manufacturers / distributors greater certainty in the compliance task.

The Australian caravan market is already highly competitive and it is in the interests of consumers that they be confident in their purchase decisions. It is good public policy that all caravans, whether they are locally manufactured or imported, meet the minimum standards for use on Australian roads, through compliance with ADRs and National Standards for caravans.

Accordingly our company, Dometic Australia Pty Ltd supports the recommendations made in the submission to the Motor Vehicle Standards Act 1989 Review by the Caravan Industry Association of Australia.

Recommendations

Imports

a) All RV imports should be subject to compliance verification by an independently qualified person prior to being issued with final import approval for first supply to market.

Personal RV imports should be limited to one every three years, consistent with the intent of this scheme.

b) Self-certification

The current self-certification scheme for imports of RVs as small trailers less than 4.5 tonne should be amended to require independent verification of compliance with ADRs and National Standards prior to being issued with final import approval for first supply to market.

2. Compliance Framework

a) Nationally Consistent Regime of Compliance Requirements Pre-registration

A new harmonised pre-registration compliance and enforcement regime should be developed with industry input and implemented by Federal and State regulators.

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b) Regulatory / Compliance Framework

A process of review should be conducted by the regulator with industry representation prior to any further consideration of replacement of ADRs with UN standards. This is in keeping with the public policy principles of ensuring minimum design and safety standards reflect Australia's unique touring conditions, are fit for purpose and safe for end users.

3. Industry Self Regulation

We support Caravan Industry Association of Australia's RV Compliance Program (RVMAP) and believe it can play an important role, in partnership with regulators' own enforcement regimes.

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