

20/10/2014

## **Motor Vehicle Standards Act 1989 Review**

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### **Submission in response to the MVSA 1989 Review by**

**Cotton Tyre Service**

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Cotton Tyres has been involved in the Caravan Industry for 15 years and is involved in the supply of tyres to the Industry.

We have observed examples of **caravans / camper trailers / fifth wheelers / motor homes** which have been imported into Australia that are clearly not compliant with the National Standards and Australian Design Rules (ADRs) that apply to domestically produced recreational vehicles.

This review is seen as an important opportunity to make important changes to address failures with self-certification of imported road trailers weighing less than 4.5 tonne. The review also presents the opportunity to create and/or facilitate nationally harmonised registration systems for compliance and regulatory oversight.

These are all important issues the industry has identified and the Industry Associations have advocated for a number of years.

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, **Cotton Tyre Service** supports the recommendations made in the submission to the Motor Vehicle Standards Act 1989 Review by the Caravan Industry Association of Australia.

## **Recommendations**

### **1. 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.

#### **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.

### **Other comments**

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Regards

**Craig Tame**

**Account Manager**