

Disaster Management and Other Legislation Amendment Bill 2024

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Community Safety & Legal Affairs Committee
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Inquiry into the Disaster Management and Other Legislation Amendment Bill 2024

On behalf of Caravan Parks Association of Queensland (CPAQ) and Caravan Trade & Industries Association of Queensland (CTIAQ), collectively referred to as Caravanning Queensland (CQ) in this submission, we appreciate the opportunity to make a submission into the Inquiry into the Disaster Management and Other Legislation Amendment Bill 2024, particularly as it applies to smoke alarms in caravans and motorised caravans.

As the peak body's for the caravan and recreational vehicle (RV) industry and caravan parks (CP) industry in Queensland, CQ encourages and advocates for initiatives designed to enhance safety and standards for users of recreational vehicle. The inclusion of Division 5B 'Smoke Alarms for caravans and motorised caravans' is a positive step in enhancing consumer safety.

Since the introduction of the mandatory smoke alarms in houses, it has become apparent that gaps exist in fire safety regulations concerning caravans and motorised caravans.

Currently, the Queensland Fire and Emergency Services (QFES) provides guidance rather than mandating fire safety measures in these dwellings. As caravans and motorhomes are a dwelling in which people sleep, the introduction of this amendment, recognises the importance of ensuring safety in all types of dwellings, and provides clear guidance for the manufacturers of, dealerships that sell, caravan parks that rent out and customers who purchase these dwellings.

As an industry, we can report that the majority of RV manufacturers are already installing smoke alarms in their products.

Before finalising installation and positioning requirements under QFES Regulation, it is important to ensure any such inquiry considers all recreational vehicle types, including their size, design and material makeup. RV's comprise caravans, motorhomes, campervans, slide-ons, camper trailers, tent trailers and 5th wheelers. These products are all unique in design and are made from a range of materials, including canvas, aluminium, fibreglass, composite, to name a few.



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The size, design and material used in the manufacture of specific RVs may impact the ability to install smoke alarms in accordance with the subsequent requirements provided under Regulations. CTIAQ would welcome the opportunity to work with the committee in drafting installation and positioning requirements.

CQ also stress the importance of implementing an adequate transition period to allow RV manufacturers, dealers and owners sufficient time to comply with the new regulations. A phased approach, incorporating education, will facilitate a smooth transition without unduly burdening stakeholders or compromising consumer safety.

Where this relates to CPs, it is critical that clear guidance is provided on those RVs which are not registered, but rather remain onsite as long-term accommodation, both those owned by the CP owner and those owned by the individual living in the RV.

In terms of specific installation methods and devices, CQ supports the use of wireless 9V or lithium-ion battery operated photoelectric smoke alarms. These devices are more suitable to the nomadic, mobile application of an RV, providing reliable and flexible installation without compromising safety.

Mandating smoke alarm installation will enhance fire safety standards for RVs and mitigate the risk of fire-related injuries and fatalities.

We thank the committee for the opportunity to provide feedback and urge policy makers to consider our recommendations and collaborate with industry to develop legislation that prioritises safety for users of RV products.

1. Clarity of definitions

Clear definitions of caravans and motorised caravans should be provided to avoid ambiguity and ensure consistent application of the legislation. Under the proposed Bill, the following definitions apply:

caravan see the Transport Operations (Road Use Management—Vehicle Registration) Regulation 2021, schedule 8.

caravan—

(a) means an enclosed trailer designed for people to live in; but

(b) does not include a camper trailer.

motorised caravan see the Transport Operations (Road Use Management—Vehicle Registration) Regulation 2021, schedule 8.

motorised caravan means a motor vehicle designed mainly for people to live in.

CQ recommend that the type of RV be further defined in The Bill. The above definitions have a broad definition and do not consider the range of different products available and their unique designs. Within the RV industry, there are a range of products which fall into the categories of caravan and motorised caravan including:

Caravan: Caravan, Pop-Top, Camper Trailer, Tent Trailer, 5th Wheeler.

Motorised Caravan: Motorhome, Campervan, Slide On's, Roof Top Tents.

These products are all unique in design and are made from a range of materials, including canvas, aluminium, fibreglass, composite, to name a few. The size, design and material used in the manufacture of these may impact the ability to install smoke alarms in accordance with the subsequent requirements provided under Regulations.

Many smaller RV products, for example camper trailers or tent trailers, do not include an internal kitchen however do include sleeping quarters. Further, while a larger RV may be suitable for longer term accommodation, a smaller RV is unlikely to be used on an extended basis.

If the intent of this legislation is that all these products are classified as caravans or motorised caravans, this should be clearly outlined, for example Caravan refers to (Caravan, Pop-Top, Camper Trailer, Tent Trailer, 5th Wheeler). Motorised Caravan refers to (Motorhome, Campervan, Slide On's, Roof Top Tents).

If the intent is to exclude smaller RV products, this should also be defined within The Bill.

2. Trigger events

In the draft Bill, it is apparent that the registration of an RV is a trigger event.

While most new RVs are now being sold with smoke alarms, there are a large number of caravans located within CPs and on private property which are no longer registered, and which are unlikely to be registered. This means that these RVs, which are more likely to be used for long term accommodation, will be excluded from the new requirements, even on or after 1 January 2027.

CQ would support action which sees these RVs required to have a smoke alarm installed to ensure the protection of those living within older unregistered RVs.

3. Smoke Alarm Type

CQ recommends the use of smoke alarms that comply with AS3786:2014 and are powered by 9V or Lithium-Ion Batteries. These detection devices are reliable, wireless, able to be installed with ease, both retrospectively and at point of manufacture. They are compliant with a variety of RV product types.

It is important that clear guidance on the specific requirements for installing smoke alarms in caravans and motorised caravans. This guidance should outline the placement, type, and interconnectedness of smoke alarms, ensuring compliance with safety standards.

CTIAQ, with its extensive industry knowledge and stakeholder base, would welcome the opportunity to work with the committee in drafting installation and positioning requirements.

4. Adequate Transition Period

Queensland has over 240,000 RVs registered, representing 3.68% of total number of registerable vehicles on our roads. This is a significant number of vehicles to assess, presenting a potential logistical challenge to ensure compliance to the change in legislation. This is in addition to those RVs which are unregistered.

CQ advocates for a generous transition period to ensure RV owners, manufacturers and dealers have adequate time to prepare, procure and install compliant smoke alarm products. An adequate transition will enable industry bodies like CQ to develop and distribute educational material to support the initiative.

On behalf of industry, CQ believe that the proposed dates of 1 January 2027 for existing registrations provides sufficient time for existing RV owners to install a smoke alarm however it is critical that a clear and adequate transition period be provided to allow RV manufactures and dealerships to implement process to ensure all future RVs include a smoke alarm.

This period should be defined in consultation with stakeholders and take into account factors such as the availability of compliant smoke alarms and the practicalities of installation. Guidance should be provided around the requirements for retrofitting smoke alarms or upgrading existing systems, including placement, type and interconnectedness, to meet the prescribed standards.

A phased approach to enforcement will facilitate a smooth transition and ensure widespread compliance without undue disruption to industry.

5. Unregistered RVs

In Queensland, approximately 80% of CP) offer some form of long-term tenancy arrangement. For the majority of these arrangements, tenants own their dwelling, often in the form of RVs, while renting a site within the CP. It is common for tenants to reside in the park for periods exceeding twelve months, and in many cases, indefinitely. In such instances, it is often the case that the RVs are not registered.

Given that these dwellings serve as primary residences for tenants, CQ recommends that all dwellings within CPs, whether owned by the CP or the resident, be mandated to install and test a smoke alarm annually. It is essential to emphasize that compliance with this regulation should not fall solely on the park owner.

Furthermore, it is imperative for the Queensland Fire and Emergency Services (QFES) to provide clear guidance on the specific requirements for smoke alarms in RVs rented to tourists on a short-term basis, particularly when the onsite van is not registered. CPAQ strongly advises its members to ensure that all dwellings rented to tourists have at least one smoke alarm installed, in addition to those provided for long-term tenants.

This proactive approach to fire safety will ensure the protection of both residents and tourists within CPs, mitigating the risk of fire-related incidents and promoting a safe living environment for all occupants.

6. Educating RV Owners

CQ is committed to working with stakeholders to ensure safer and compliant RV products for all users. CTIAQ currently run a series of initiatives and events that are designed to arm Recreational Vehicle owners with the knowledge, skills, and resources to be more confident, compliant and safe whilst travelling in their RV.

This is achieved through a variety of different methods including, caravan shows & expos, live seminars / workshops / masterclasses, digital communication, video and email messaging. Through these initiatives and events, CTIAQ is able to communicate with the vast majority of owners of the 240,000+ registered RVs in this state.

In addition to this significant consumer base, both CTIAQ and CPAQ have an engaged membership of industry businesses with which they can communicate key changes in an appropriate and timely manner.


CQ is committed to working with State Government and other relevant stakeholders to inform and educate the RV community on the new smoke alarm requirements in RVs, the transition and commencement date.

In conclusion, CQ urge the Committee to consider our recommendations when finalising the Bill amendments. CQ strongly advocates for the inclusion of clear definitions, the suitability of the technology to the application, an appropriate transition and adequate education for industry and RV owners.

Should you have further questions about this submission, please do not hesitate to contact us on the details in the cover email sent with this letter, or on page one of this document.

Kind regards


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[About Caravanning Queensland](#)

We trade under the brand Caravanning Queensland which joins the two related but separate peak industry bodies in Queensland:

Caravan Parks Association of Queensland (CPAQ) is the peak industry body representing caravan parks in Queensland. Established in 1966, we provide a united and informed voice for the Queensland caravan parks industry.

As a professional, solution focused association, we encourage and support industry best practice across all areas of business by providing our members with leadership, support, networking, professional development, and promotional opportunities.

There are currently over 430 full and associate members of CPAQ, made up of caravan parks (catering for tourists and residents) and campgrounds, large and small, from all corners of the Queensland, industry suppliers, tourism businesses, plus regional and local tourism organisations.

Caravan Trade & Industries Association of Queensland (CTIAQ) is the peak industry body for the trade sector of the caravan and recreational vehicle industry in Queensland.

Established in 1964, the association provides regulatory support & advocacy for members, delivers industry promotion & public relations, owns & operates the largest caravan & recreational vehicle events in this state, and coordinates state-wide consumer safety education initiatives.

There are currently 240 members made up predominantly of retailers, manufacturers, hirers, repairers, and suppliers in the caravan and camping industries. Our Association strives to foster and assist the development of the caravan trade and associated businesses in Queensland, promoting a high standard of quality service and ethics.