

Inquiry into Vehicle Safety, Standards and Technology, including Engine Immobiliser Technology

SUBMISSION – CARAVAN TRADE & INDUSTRIES ASSOCIATION OF QUEENSLAND

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The Caravan Trade & Industries Association of Queensland (CTIAQ) welcomes the opportunity to provide feedback in relation to the inquiry into Vehicle Safety, Standard and Technology, including Engine Immobiliser Technology.

EXECUTIVE SUMMARY

As the peak body for the caravan and recreational vehicle industry in Queensland, the CTIAQ support inquiries and initiatives designed to improve vehicle safety and standards.

It is important to ensure any such inquiry considers all road vehicles including caravans and recreational vehicles (motorhomes, campervans, slide-ons), taking into account the potential impact of any decisions leading to legislation change.

While the COVID-19 Pandemic has placed significant pressures on all businesses, the caravanning and camping industry is emerging as a shining light in the recovery for Queensland. The Commonwealth Bank Household Spending Intentions Series for December 2020 reported that the biggest annual increases in spending were seen in camper, recreational & utility trailer dealers, motor home & recreational vehicle rentals and trailer parks & campgrounds.

With international travel off the agenda for some time, domestic holidays are now more popular than ever, fueling a renaissance in the traditional “road trip” holiday. Recreational vehicle sales have surged, driven by interest from newcomers to the industry who would normally be taking an overseas cruise or holiday.

This is reflected in Caravan Manufacturing and Import statistics. January 2021 showed an increase on the same period in 2020 of 22.6% and 52% respectively and this has continued into February with an increase of 10.2% and 88.55% respectively.

Despite this good news, the industry is turning into headwinds.

1. With many first-time users on the road, we are starting to see increased safety concerns. These new recreational vehicle owners will benefit greatly from targeted road safety education designed to get them to their ultimate destination and back again, incident free.

2. Increased demand and extended delivery times on locally manufactured product, may drive consumers to non-compliant, potentially unroadworthy and unsafe recreational vehicle products. This could include re-birthed statutory written off vehicles.
3. When international borders reopen there is the significant risk that many of the RV's purchased during the COVID-19 pandemic period will be sold. This is likely to result in the devaluing of these products which have traditionally held their value well. There is the potential for more private sales in which important servicing, checks and safety issues may be bypassed.

Despite these headwinds, there are still plenty of opportunities to work collaboratively with likeminded organisations and government departments in delivering positive road safety initiatives and outcomes for consumers.

THE INQUIRY TERMS OF REFERENCE:

1. Options to reduce or prevent vehicles being used illegally or dangerously on Queensland roads, including vehicle engine immobilisation technology, non-technology options, operational considerations or other measures;
2. Lessons learned from other jurisdictions, particularly regarding the implementation of vehicle engine immobilisation technology to the existing vehicle fleet;
3. The Commonwealth's role in relation to vehicle standards and safety, and measures the Commonwealth could take, including requiring all new vehicles to be fitted with remote engine immobilisation technology;
4. The effectiveness of any proposed measures in improving road safety, preventing crime and assisting police in operational matters;
5. A recommended framework for legislative, policy and operational implementation of any proposed measures;
6. The benefit to and role of insurers in supporting any recommended measures;
7. Options to improve vehicle standards and safety in Queensland, including in relation to the:
 - current Australian vehicle design rules;
 - inspection regime for registered vehicles;
 - pre-sale certification scheme, including measures to reduce fraud and improve consumer safety;
 - management of written-off vehicles and 're-birthing';
 - after-market vehicle modification framework, including achieving consistency to ensure best alignment with other Australian jurisdictions.

RECOMMENDATIONS / FEEDBACK

1. As per “ADR 82/00 Engine Immobilisers”, passenger cars, forward-control passenger vehicles and off-road passenger vehicles, must be equipped with an engine immobilising device. This ADR states that this is not a requirement for motorhomes and campervans.

Following the precedence set out in “ADR 82/00 Engine Immobilisers”, the CTIAQ believe that these REI devices should only be fitted to vehicles applicable in the ADR, with Motorhomes and Campervans being excluded.

Remote Engine Immobilisation (REI) technology must be thoroughly investigated, to determine benefits, risks and any opportunities associated with its potential implementation. Engagement with all road user groups and organisations impacted must be conducted, considering all opinions and concerns. Following this inquiry, CTIAQ propose forming a working group comprised of all major road user groups to assess the potential impact of REI implementation.

As an industry, we do have some safety and other concerns regarding the potential use and implementation of REI technology.

- What are the controls around security, eliminating potential interception by a third party, taking control over a vehicle?
 - How is constant connection maintained to ensure remote capabilities are maintained?
 - What are the cost implications to manufacturers and consumers?
2. In conjunction with CTIAQ, run educational / awareness campaigns highlighting to consumers the importance of product compliance, providing tips on how to identify rebirthed recreational vehicles (refer below “Identifying Stolen / Rebirthed Caravans” for more detailed recommendations).
 3. Reducing the number of trailer plates available to individuals from three to one under the Low Volume Vehicle (LVV) Identification scheme. This will limit the number of products able to be supplied to market by private individuals, however it will still enable homebuilders, with the appropriate skill sets, to manufacturer their own box trailer for personal use (refer below “Low Volume Vehicle Identification Number VIN for more detailed recommendations).
 4. Introduce simple gas system inspection of statutory written off recreational vehicle products being sold through auction houses.
 5. Support CTIAQ in the expansion of the Caravan Safety Check program, introducing new locations / regions to the state-wide program. Conduct Safety Checks on QLD / NSW border during the winter months, to capture the RV owners migrating north for their holidays during the cooler months. Implement consumer education initiatives including face to face towing masterclasses,

instructional / how to videos and safety tips around weights / payload / overloading (refer below “Caravan & Recreational Vehicle Road Safety Initiatives” for more detailed recommendations).

6. In conjunction with CTIAQ, develop a consumer education program around after-market modifications to caravans and recreational vehicles. Many consumers modify their caravan or RV after purchase, leading to potential overloading, exceeding the critical ratings as set by the tow vehicle and recreational vehicle manufacturer.

IDENTIFYING STOLEN / RE-BIRTHED CARAVANS

Educate the general public on ways to identify stolen / rebirthed caravans and recreational vehicles by providing information on the below common identifiers.

Vehicle Plate – Tampered With, Damaged or Obliterated

Every trailer (including recreational vehicles, caravans, camper trailers, tent trailers) must have a vehicle plate affixed to the trailer by the manufacturer of the product. The plate must be made from durable, non-corrosive metal and must be affixed to the trailer in a position that is easily accessible and clearly visible. On a caravan the plate is commonly attached to the draw bar / A-frame or inside the front boot / storage compartment. On some recreational vehicles it could also be placed just inside the front door or inside one of the cupboards. (see photo example)

The plate must be affixed by pop-rivets, hammer drive screws or welding. Using certain glues or adhesives is not acceptable under the Australian Design Rules.

It is compulsory, as per the Australia Design Rules, for the vehicle plate to display a minimum level of information about the product it is affixed to. Most vehicle plates that are used on Australian manufactured trailers or caravans will also contain additional information, vital for the safe operation of the caravan and or recreational vehicle. All of this information must be clearly legible, using characters no less that 2.5mm in height and either embossed, indented, etched or engraved onto the vehicle plate.

If any of the information on the Vehicle Plate appears to have been tampered with, scratched, crossed out, painted over, obliterated or altered in any way, it is a sign that the vehicle or trailer is potentially illegal.

Caravan Decals / Branding

Most caravans should have the manufacturer’s name and the model name of that particular caravan affixed to the outside of the caravan somewhere.

Generally, the manufacturer’s name decal that is affixed to the caravan should match the manufacturers name that is recorded on the vehicle plate.

There are however instances where the manufacturer’s name decal on the caravan may be different to the manufacturers name etched on the plate. This is where the caravan manufacturer may build more than one brand of caravan.

For further information on caravan manufacturers and the brands they build, we advise contacting a member of the Caravan Trade & Industries Association of Queensland (CTIAQ).

Chassis Number or VIN Number Removed

Although not a requirement under legislation, it is common practice for the manufacturer of the caravan chassis to weld a chassis number into the A-Frame of the caravan. Particularly late model caravans.

It is mandatory in Queensland, as per a directive from The Department of Transport and Main Roads, that the Vehicle Identification Number (VIN) be stamped onto the drawbar / A-frame of the caravan / trailer.

In cases of theft or re-birthing, to hide the identity of the product, these numbers will more than likely be removed. Look for the following:

- Marks where the chassis number has been ground off
- Fresh paint patch on the Drawbar / A-Frame where a potential chassis or VIN number could have been previously placed.
- No chassis number or VIN number present at all

Vehicle Plate Information Matches Registration Papers

Make sure the vehicle information engraved on the vehicle plate, matches the vehicle information recorded on the registration papers. Pay special attention to the following items:

- The Manufacturer or Importer's Name
- Vehicle Model
- Vehicle Identification Number (often referred to as a VIN number)
- Date of Manufacture

PPSR Search – Personal Property & Securities Register

The Personal Property Securities Register (PPSR) allows lenders and businesses to register their security interests. Secured parties, buyers and other interested parties can search the PPSR to find out if a security interest is registered over the personal property. Consumers who are about to purchase personal property, such as valuable second-hand goods can check the PPSR to make sure the property is free of a security interest or encumbrance.

Prior to purchasing a second hand recreational vehicle, insist upon a PPSR search. This will assist in determining whether the vehicle is encumbered, written-off, stolen or registered in any state or territory in Australia.

Price Too Good To Be True

If the price seems too good to be true, it probably is. If the seller is attempting to offload a stolen or re-birthing caravan, they will be trying to move it quickly. Therefore, the price they will be asking for will generally be considerably lower than what the product is worth.

It is important that consumers and Department of Transport Staff assessing vehicles or administering the registration process, are familiar with the above signs of re-birthing. This education can only be achieved through a coordinated effort from Government and Industry. A potential relaunch of the "Vanaware" campaign, a joint initiative of the Queensland Government Department of Transport and the CTIAQ which ran through 2018 (<https://www.qld.gov.au/transport/buying/caravanning/van-aware>).

LOW VOLUME VEHICLE IDENTIFICATION NUMBER (VIN)

Under the Low Volume Vehicle (LVV) Identification scheme in Queensland, the Department of Transport will issue a maximum of three LVV's in a calendar year. Manufacturers requiring more than three, must apply direct to the National Exchange of Vehicle and Driver Information System (NEVDIS).

CTIAQ firmly believe that reducing the maximum number of VINs available in a calendar year from three to one, will reduce the potential for the rebirthing of recreational vehicles products into the market. It will be less appealing to those attempting rebirthing of products if the financial return is reduced by reducing the number of VINs available for allocation.

Any individual requiring more that one VIN, can still apply through the NEVDIS system.

For the rebirthing of illegal, non-compliant and statutory written off recreational vehicle products to be reduced, a collaborative effort is required, involving all state jurisdictions. Systems and processes of identification and assessment must be consistent across all states to make it more difficult to transfer and register rebirthed product across state boundaries.

Some recommendations on how to lessen the risk of potential re-berthing could include:

1. Mandating a thorough physical inspection of every trailer requiring a surrogate VIN by trained personnel. This will ensure the condition and fabrication of the trailer complies with basic vehicle safety standards, ADR's and that any issues with identification are detected. The Qld Inspection Service (QIS) currently performs such inspections for repairable written off vehicles. Implementing compulsory inspections for all trailers requiring a surrogate VIN by QIS or a similar, would significantly address this issue.
2. Conducting an audit of all low volume VINS issued over a period of time for trailers over 750kg to identify any safety issues or incidents of fraud.

The re-birthing of statutory written off vehicles is a concern and there are examples of this occurring. We must remember, written off vehicles are written off for good reason and ensuring they cannot be re-birthed will improve road safety.

CARAVAN & RECREATIONAL VEHICLE ROAD SAFETY INITIATIVES

CTIAQ is committed to making Queensland roads safer for all users. With Government & stakeholder support, we aim to arm Recreational Vehicle owners with the knowledge, skills, and resources to be more confident and aware whilst travelling throughout this state.

In 2021 we are embarking on an ambitious, yet vitally important program of events designed to reach as many Recreational Vehicle owners as possible. This will be achieved through a variety of different methods including, caravan shows & expos, live seminars / workshops / masterclasses, digital communication, video and email messaging.

Our overarching objective is simple:

“Zero accidents in Queensland involving caravans & recreational vehicles by 2024”

This is bold, but achievable and certainly worthy of a concerted effort.

To achieve this objective, we are seeking support from industry stakeholders and the state government to assist in the delivery of important road safety messages and initiatives to the more than 192,000 recreational vehicle owners across this state. Without additional support, we will not be able to deliver this program in its entirety.

CTIAQ will be building upon our well-established Caravan & Road Safety initiatives. The Caravan Safety Check Program will be rolled out state-wide and enhanced by introducing live, interactive workshops and seminars. This will be complemented with video and digital assets that will enable us to expand the reach of the program.

Our road safety objectives align with many stakeholders, including all levels of Government, the Insurance industry in that we want fewer accidents involving caravans. With a collaborative effort, spanning the entire state, I am confident we can educate more recreational vehicle owners resulting in safer roads for all users.

Caravan Safety Checks Expansion

The Free Caravan Safety Check program was implemented in 2015, expanding significantly over the past few years. The main observation taken from the program is that most Road Users display a desire to comply with Australian Standards and Legislation. This is challenging due to a lack of understanding, particularly regarding weights, the terminology and the limitations of both their tow vehicle and recreational vehicles.

The program provides an opportunity for owners to have their recreational vehicle and tow vehicle weighed and assessed for compliance against the relevant Australian Standards. The inspection is conducted by Department of Transport and Main Road Inspectors, with no infringement notices being issued. The program is available to Road Users on a voluntary basis and is designed to educate road users on the challenges they may encounter when travelling Queensland roads.

Industry experts are on hand to provide information and tips on a range of topics designed to educate RV owners, including: Gas Compliance, Caravan & Tow Vehicle Suspension, Towing Courses / Driver Education, Recreational Vehicle Engineering, Insurance & Weight Distribution.

Why we do these Safety Checks?

- To support Queensland recreational vehicle owners with an opportunity to participate in a program aimed at education and improving road safety.
- To increase driver understanding of the challenges they may face whilst travelling on the roads, and to ensure they are better equipped to avoid accidents.
- To provide an opportunity to view the latest towing equipment and safety accessories and discuss their use with caravan industry experts.

With State Government support, the opportunity exists to introduce interactive weight, towing & driver education masterclasses to run in conjunction with Caravan Safety Check days. Experienced recreational vehicle industry experts will present seminars on a range of topics including weights and towing, driver education and recreational vehicle maintenance. These seminars have been conducted at our Caravan Shows for the past couple of years, receiving extremely positive feedback from consumers.

ALL ROAD USERS BENEFIT from having more compliant, safe and educated RV owners on the road.

It is our intention to run these seminars throughout Queensland in 2021, expanding beyond the four industry owned and operated events; Let's Go Queensland Caravan & Camping Supershow, Let's Go Gold Coast & Sunshine Coast Caravan & Outdoor Expos and the Let's Go Brisbane Caravan & Outdoor Sale. There is an opportunity to host the masterclasses at the same venues or regions where the Caravan Safety Checks are being conducted across the State.

ABOUT US

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.

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

CARAVAN TRADE & INDUSTRIES ASSOCIATION OF QUEENSLAND (CTIAQ),

CTIAQ the peak industry body and voice of the trade sector in the caravan, recreational vehicle and camping industry in Queensland.

CARAVAN PARKS ASSOCIATION OF QUEENSLAND (CPAQ)

CPAQ is the voice of the caravan park owners and operators and associated supply chain in Queensland.

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