



Committee Secretary  
Transport and Resources Committee  
Parliament House  
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Dear Committee Secretary

**RE: Transport Legislation (Road Safety and Other Matters) Amendment Bill 2022**

On behalf of Caravan Trade & Industries Association of Queensland (CTIAQ), please accept our submission on the Transport Legislation (Road Safety and Other Matters) Amendment Bill 2022 ("the Bill").

### Background

CTIAQ operates under the trading name, Caravanning Queensland. Caravanning Queensland is a not-for-profit industry association, uniting the two established peak industry organisations in Queensland — the Caravan Trade and Industries Association of Queensland and Caravan Parks Association of Queensland.

Members of each respective association consist of caravan/recreational vehicle retailers, manufacturers, service and repairers, suppliers, hirers, and caravan parks.

COVID-19 has highlighted the importance of caravanning and camping to both tourism and the broader economy. As an industry it contributes \$2.9 billion to the Queensland economy each year — \$55 million every week — through manufacturing, retail sales, service and repair, and caravan park visitations.

### The Bill

CTIAQ will focus its comments on the proposed amendments to Transport Operations (Road Use Management) Act 1995 to ensure the fines from camera detected offences will continue to be available for road safety education and awareness programs.

In his introductory speech on 26 May 2022, Minister for Transport and Main Roads, The Honourable Mark Bailey said the amendment would:

*"Ensure CDOP (Camera Detected Offence Program) funds are prioritised and reinvested to reflect Queensland's use of the Safe System approach and support targeted initiatives that will help Queensland achieve the road safety targets we have committed to in the Road Safety Strategy; that is, to achieve a 50 per cent reduction in lives lost and a 30 per cent reduction in serious injuries on Queensland roads by 2031."*



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A Member of

- Caravan Industry Association Australia
- Queensland Tourism Industry Council

CTIAQ welcomes this amendment and commends the Government and Minister Bailey for ensuring reinvestment of funds into additional road safety initiatives.

Like the Government and the broader community, CTIAQ is extremely concerned by the rate of fatalities on Queensland roads. When the Minister introduced the Bill on 26 May, there were 126 fatalities. By 12 June, there had been an additional 10 fatalities, representing a 30.8% increase compared to the same period for 2017<sup>1</sup>.

CTIAQ encourages its members and all road users to abide by road rules to avoid penalties, such as CDOP offences, but importantly for their safety. CTIAQ has long-standing partnership with the Department of Transport and Main Roads and Queensland Police Service to proactively promote road safety.

Road safety for caravanning and recreational vehicle use have additional considerations beyond the fatal five—speeding, driving fatigued, drink and drug driving, driving distracted and driving without a seatbelt.

When considering Caravan and Recreational Vehicle Road Safety, there are complexities unique to towing which require additional skills, knowledge, and training. Towing is more complex than just attaching a trailer to a tow vehicle. There are a range of factors to consider, including but not limited to the following:

- The towing capacity of your vehicle and it's compatibility to the trailer
- Which tow bar should be fitted to the vehicle and the maximum load capacity of the coupling
- Making sure the trailer doesn't exceed the tow vehicles critical ratings when coupled
- Understanding definitions and terminology such as ATM (Aggregate Trailer Mass), GCM (Gross Combination Mass), GTM (Gross Trailer Mass), GVM (Gross Vehicle Mass), Tare Mass, Tow Ball / Coupling Mass and Payload
- Correct loading of the trailer
- Trailer stability and equipment available to improve safety
- Compliance to Australian regulations

All these factors impact the safe operation of the Recreational Vehicle whilst towing. Without adequate education on these and other towing matters, RV owners increase the risk of incident or accident whilst towing.

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<sup>1</sup> Department of Transport and Main Roads, Queensland Road Crash Weekly Report, No: 1273, 13 June 2022

Recreational Vehicle national road crash statistics sourced by the Caravan and Trailer Road Safety Alliance highlight the following:

- Since 2015, there have been 1,858 crashes, 1,300 casualties (hospitalisations) and 51 fatalities. On average 8.5 people die on the road each year through an RV crash, this is compared to an average 1163 total road deaths.
- 59% of all RV Road crashes involved another vehicle.
- Head on collisions are the most fatal, with 50% of fatalities involving a head on.
- RV road users are most likely to have an accident on Monday or Sunday as drivers return from holidays. This is most likely due to a build-up in driver fatigue from their travels and may be a result of late nights and possibly alcohol intake as well as rushing to make the trip home.
- Accidents are most likely to occur between 10am and 12pm.
- Whilst road accidents are more likely to occur in urban centres, fatalities are more likely to occur on regional roads

CTIAQ recently surveyed Caravan/RV Service and Repair Members to ascertain approximately how many caravans are being repaired annually because of a road or impact accident.

Responses revealed over 1,750 caravan or RV repair jobs because of a road or impact accident. The most common causes of these accidents are inexperience, carelessness, distraction, overweight or poor weight distribution. Most responses revealed that up to 60% of all jobs are related to an impact accident of some nature.

CTIAQ has worked with TMR and other Queensland Government agencies, including the Queensland Police Service, to deliver Caravan Safety Check Program.

Under this program, over 3000 vehicle inspections have been conducted since 2015.

### **Caravan Safety Check Program - Zero Recreational Vehicle Accidents by 2025**

With a shared commitment to road safety and in recognition of the increased popularity of caravanning particularly following the COVID-19 global pandemic, CTIAQ has proposed to the Queensland Government, an enhanced Caravan Safety Check Program over three financial years (2022–23 to 2024–25) with the objective of Zero Recreational Vehicle accidents by 2025.

The proposal for an investment of \$1,390,419.60 over three years has the potential to reach an audience of more than 660,000 caravan and recreational vehicle enthusiasts – the equivalent of \$2.10 per contact. This proposal is subject to a sponsorship application to the Queensland Government.

The enhanced Caravan Safety Check Program initiative will be delivered through a five-pronged strategy.

1. Physical Checks/Inspections of RV Products (Weigh Days)
2. Hands on, Interactive Workshops, Seminars and Training
3. Instructional and Educational Videos
4. Digital and Print Content/Material
5. Caravan Shows across the State

Caravanning Queensland believes an enhanced Caravan Safety Check Program and the ambition to achieve zero recreational vehicle accidents by 2025 will assist the Government's 2031 targets, which Minister Bailey addressed in his introductory speech on the Bill that:

*“These are ambitious targets; however, we do not accept that serious road trauma is the price for mobility. The development and implementation of road safety initiatives that use new approaches, innovation and proactive measures is needed. We need to support research and development, trials, and the delivery of new solutions where trials are successful.... The amendments make it clear that CDOP funds in excess of administration costs may also be applied to developing and implementing new or improved initiatives that enable improved road safety behaviours or practices.*

*This may include adopting new approaches, innovation, and more proactive measures. This can include, for example, supporting working with road users, employers, and community groups to motivate and influence safe road user behaviour through incentivisation through enabling participation, collaborating, and sharing expertise, partnerships and undertaking proactive research. It may also include new and emerging targeted programs of work designed to reduce road trauma, such as: the trial and evaluation of distinct and increased drug driving deterrence, education, and driver awareness programs; anti-hooning technology; and expanding the reach of the automated numberplate recognition technology program across the enforcement network.”*

In the Minister's words, the enhanced Caravan Safety Check Program is a “more proactive”, “targeted”, “education and driver awareness” program that will deliver content aligned with the Government's Queensland Road Safety Action Plan.

The initiative delivers on the Premier's priority action for Minister Bailey in her 1 December 2020 Ministerial Charter letter to:

*“Continue to implement the Safer Roads, Safer Queensland: Queensland's Road Safety Strategy 2015 – 21 and the Safer Roads, Safer Queensland: Queensland's Road Safety Action Plan 2020 – 21 and develop a new road safety strategy for future years to help Queensland move towards the long term vision of zero deaths and serious injuries on Queensland roads.”*

## **We are Passionate about Road Safety**

The CTIAQ has always been a strong advocate for road safety in Queensland. Educating Caravan & Recreational Vehicle owners is a key objective for our Association. In addition to the aforementioned Caravan Safety Check Program, CTIAQ has promoted, and participated in various road safety initiatives including, but not limited to:

### **Queensland Road Safety Week**

Caravanning Queensland is a proud supporter of Queensland Road Safety Week, a road safety initiative of the Queensland Police Service and the Department of Transport and Main Roads. The boom in domestic travel means more Queenslanders are on the road and Queensland Road Safety Week provides the opportunity to highlight some of the important aspects of towing to ensure Caravan and RV trips are not only memorable but safe. In promoting Queensland Road Safety Week, CTIAQ collaborated with some of the very best in the Queensland Caravanning Industry to produce and distribute some important educational and awareness videos about Safe Towing. Topics included: Suspension, Wheel Bearings, VIN/Trailer Plate, Connecting your Trailer to the Tow Vehicle, Driver Training, Tyres, Trailer Couplings, Aftermarket Accessories, Braking Systems and Weight Distribution Hitches. A suite of videos was produced in 2020 and have been uploaded to the Caravanning Queensland website, [caravanqld.com.au](http://caravanqld.com.au).

### **National Recreational Vehicle Towing Guide**

The CTIAQ contribute annually, both financially and with content, to the Caravan Industry Association of Australia's "National Recreational Vehicle Towing Guide". The guide contains a wealth of technical information, handy hints and advice designed to provide Caravan & RV owners with a greater degree of confidence and safety while towing. This is a free publication, currently in its 10th edition and contains valuable information on every aspect of towing, including:

- Tow Vehicle, Towing Parts, Braking Systems, Tyres, and different Vehicle Types
- Weight Distribution Hitches, Sensible Loading, Trailer Stability & Sway, Rear Marker Plates, Offroad Towing Techniques, Overtaking
- How weight effects towing
- Trip Preparation

This FREE publication is available for download from [caravantowingguide.com.au](http://caravantowingguide.com.au) and in hard copy from caravan dealers, repairers, various industry businesses and industry owned caravan shows.

### **Caravan and Trailer Road Safety Alliance**

CTIAQ is a proud financial member and contributor to the Caravan and Trailer Road Safety Alliance. With the boom in Caravan and RV ownership, it is important that consumer road safety remains a priority. Consumer wellbeing and safe, compliant industry product should be paramount. The Caravan & Trailer Road Safety Alliance was formed in 2020 to investigate better consumer outcomes and ways to reduce RV accidents. Alliance participants investigate projects under sub-headings (or vertical streams), initially focusing on the areas of consumer education, technology, regulation development, insurance, government interaction and research. The Caravan and Trailer Road Safety Alliance proactively investigates key projects which enhance consumer safety. The Alliance has been warmly welcomed by industry and Government alike. The opportunity to participate is available for funding partners who then regularly meet to workshop key priorities. Key projects identified will subsequently seek appropriate funding and will look to be executed by Caravan Industry Association of Australia in conjunction with state caravanning associations. This Alliance is an example of Industry positively collaborating on initiatives designed to assist in making sure that families get home to their loved ones after their caravanning trip. The impacts of caravan accidents can be devastating, and this Alliance is a great step in working towards strong outcomes for all road users.

### **Weight and Towing Masterclasses**

CTIAQ presents FREE weight and towing masterclasses at every industry owned caravan show in Queensland each year. These masterclasses are delivered by industry professionals with an expertise in caravan & RV weights & loading, caravan & tow vehicle combination set up and driver training. Session topics include:

- Weights, Vehicle Set Up & Combination Safety on the Road
- Sensible and safe loading and weight distribution
- Offroad Vehicle Recovery

### **Co-Exist — Truck Rest Stop Education**

CTIAQ teamed up with the Queensland Trucking Association (QTA) and Caravan Industry Association of Australia to create some educational video content around the safe and correct use of Truck Rest Stops. These videos are designed to educate recreational vehicle owners in the appropriate and legal use of truck rest stop areas. In collaboration with the QTA and Caravan Industry Association of Australia, our objective is to change behaviour and the attitude of caravanners and recreational vehicle owners. Focusing on caravans and recreational vehicles parking in truck-only dedicated areas and providing some best practices behaviours when in a shared truck rest area. CTIAQ members promote the website [coexist.org.au](http://coexist.org.au) to their customers so that everyone has a better understanding on how and when to use rest areas while travelling through Queensland.

### **Vehicle Towing Mass Guide**

The Vehicle Towing Mass Guide is researched and produced by CTIAQ. It is designed to assist persons who are required to give advice to members of the public seeking to make decisions regarding trailer towing and/or trailer — vehicle purchases. The Vehicle Towing Guide database contains detailed information about many vehicles (not exceeding 4.5T GVM) that have been sold new in Australia from 2004 onwards. Data included, where available, is the vehicle year model, manufacturer's braked and unbraked towing masses, tow ball downloads, specific towing conditions and vehicle weights. CTIAQ sources this information from various Motor Manufacturers or their Agents to keep the database current. Persons giving advice regarding towing mass data should always be aware that many manufacturers have specific conditions for their vehicles when used for towing. Failure to comply with these conditions may void that vehicle's warranty, cause mechanical damage or worse, result in a vehicle accident with possible loss-of-insurance implications. Emphasis should always be stressed on the need for persons to refer to the vehicle manufacturer's handbook before contemplating towing and even prior to the purchase of a vehicle, as the cost of additional mandatory/recommended vehicle equipment may become a buying consideration.

### **Recommendation:**

The Committee supports the amendment to *Transport Operations (Road Use Management) Act 1995* to ensure the fines from camera detected offences will continue to be available for road safety education and awareness programs.

The Committee acknowledges the enhanced Caravan Safety Check Program would be an example of a funded measure to improve road safety for a growing segment of motorists and for other users of Queensland roads.

On behalf of the Caravan Trade & Industries Association of Queensland, I would welcome the opportunity to appear before the Committee and provide any further information or clarification on our submission.

Jason Plant



Chief Executive Officer  
Caravan Trade & Industries Association of Queensland