



Australian Government

**Department of Infrastructure,
Regional Development and Cities**



RVSA Implementation Consultation Framework

Concessional RAV Entry Consultation Group

*Discussion Paper CR2 – Campervan and Motorhome Conversions
– Model Report Guidance*

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Introduction

The Road Vehicle Standards Rules include new criteria for the entry of vehicles onto the Register of Specialist and Enthusiast Vehicles.

One of the criteria is the campervans and motorhome criteria. This criterion allows vehicles that are either originally manufactured as a campervan or motorhome, or suitable for modifications to convert a vehicle into a motorhome, to be entered onto the SEV Register.

To satisfy the requirement that a vehicle is 'suitable for modification' the decision maker must be satisfied that the vehicle can be made to comply with the design requirements for campervans and motorhomes.

This paper is the Department's first stage of consultation on what these modifications to make a vehicle into a campervan and motorhome will look like.

Issue

The Government's initial policy on campervans and motorhomes was that they could only be entered onto the SEV Register if they were originally manufactured as campervans and motorhomes. Following consultation with stakeholders, the Government agreed to modify this criterion to extend to vehicles that are suitable for modifications to turn the vehicle into a motorhome.

In making this decision, the Government made it clear that such modifications should be difficult to remove. This is to reduce the likelihood that these vehicles will be converted back into their original vehicle type, such as people movers or light buses.

This paper sets out the principles that the Department is proposing for how it will build the campervan and motorhome modification requirements.

Principles for conversion into campervans and motorhomes

1. The overriding test that the Department will apply when assessing the suitability of a model report for motorhome or campervan conversion will be the "permanency" of modifications and whether the vehicle can easily be modified back to the original vehicle. If the Department is not satisfied that the modifications are sufficient it will not approve the model report.
2. To assist industry in understanding their obligations, we will set out the "minimum features" that are required for a campervan. Model report applicants must ensure the work instructions for the vehicle will result in a vehicle that meets these minimum standards.
3. The model report requirements will continue to draw on certain requirements from the current Administrator's Circular 0-4-12.

Proposed minimum requirements for campervans and motorhomes

The Department has drawn on examples of international practice for addressing motorhome and campervan conversions as well as the Department's current guidance material, circular 0-4-12 ([Attachment A](#)).

The Department is proposing adopting "minimum features" for a campervan/motorhome conversion, similar to that used by the Driver and Vehicle Licensing Agency in the UK. The minimum features are similar to the current circular, but will provide more objective requirements, in line with the Government's decision that these features should not be easily removable. The minimum requirements we are considering are:

- A door that provides access directly to living accommodations (rear or left hand side of the vehicle, right hand side only is not acceptable).
- A flat bed with minimum length of 1800mm. This must be permanently fixed to the vehicle. It can convert from seats used for other purposes during the day. It should be able to comfortably be used by an adult (eg, can't be so narrow that a person can't lie on it comfortably).
- A water storage tank fixed on, or in, the vehicle.
 - We are considering specifying a minimum volume for this water storage.
- A seating and dining area inside the vehicle, permanently attached to the vehicle. A table may be detachable but should have some permanent means of attachment to the vehicle.
- A permanently fixed means of storage, such as a cupboard, wardrobe or locker.
- A permanently fixed cooking facility within the vehicle, powered by gas or electricity
- At least one window on the side of the accommodation.

Gross vehicle mass

- Substantially retain current guidance included in 0-4-12.

Designated sleeping positions

- Retain general requirement that a vehicle cannot have more sleeping berths than designated seating positions. Sleeping berths definition will align with minimum requirements.

Seats, seatbelts, and seatbelt anchorages

- Substantially retain current guidance included in 0-4-12.
- Continue to require clear labelling on the vehicle regarding seating positions and how seating positions can be used when the vehicle is in motion.
- Clarify that a reclined seat must be completely flat and at least 1800mm long to satisfy the minimum features requirement.

Glazing material

- Substantially retain current guidance included in 0-4-12.

LPG

- Substantially retain current guidance included in 0-4-12.

General safety

- Substantially retain current guidance included in 0-4-12.

Certification evidence requirements

- Model report applicants will be required to provide similar material as is currently required

Discussion questions

- The Department is also considering minimum features for “motorhomes” as distinct from campervans. This would be additional minimum features over the campervan features.
 - Would this be a useful distinction?
 - Where would the cut off between motorhome and campervan be?
 - What should the additional features look like? We would consider features like fixed plumbing, bathroom facilities, standing height.
- If we imposed a minimum volume for water storage, how should this be worked out?
 - Enough to carry 48hrs of water for each designated seating position (eg, ~5L per designated seating position?)
- Should the model report determination require campervan and motorhome converters to comply with other Australian standards for the installation of LPG, plumbing, and electrical work? Are these national standards or recognised differently by different jurisdictions?
- Are the minimum features sufficient to ensure conversion is difficult to reverse?

Issued by the
Administrator of Vehicle Standards



Australian Government

Department of Infrastructure and Regional Development

in consultation with the
Australian Motor Vehicle Certification Board comprising
Commonwealth, State and Territory representatives

CIRCULAR 0 – 4 – 12

CERTIFICATION OF CAMPERVANS AND MOTORHOMES

1. INTRODUCTION

1.1 This Circular sets requirements for a *new vehicle* Campervan or Motorhome manufactured as a completed vehicle, as well as a Campervan or Motorhome manufactured by adding to, or modifying, a completed *new vehicle* undergoing Second-Stage-of-Manufacture (SSM), as per Circular 0-4-6.

1.2 This Circular also sets requirements for a *used imported vehicle* Campervan or Motorhome or a *used imported vehicle* to be modified to become a Campervan or Motorhome, subject to the Motor Vehicle Standards (Approval to Place Used Import Plates) Determination 2002.

2. DEFINITIONS

2.1 Terms shown in *italics* are defined within the *Motor Vehicle Standards Act 1989*, the Australian Design Rules for Motor Vehicles and Trailers – Third Edition, or this Circular.

2.2 The term *motorhome* applies equally to both a Campervan and Motorhome.

2.3 A *motorhome* is a special purpose *motor vehicle manufactured* to include accommodation space which contains at least the following equipment:-

- seats, and table;
- sleeping accommodation, which may be by converting seats;
- cooking facilities; and
- storage facilities.

This equipment shall be rigidly fixed; however, the table may be designed to be easily removable.

2.4 A *designated seating position* is a *seating position* as designated by the *manufacturer*, intended to be occupied when the vehicle is being *used in transport*. A *motorhome* may have additional seats provided for purposes other than to be *used in transport*.

3. MOTORHOME VEHICLE CATEGORY

3.1 The *motorhome* Vehicle Category of a completed *motorhome* is to be determined as per the ADR Vehicle Categories, but using “*designated seating positions*” in lieu of “*seating positions*”.

ATTACHMENT A – ADMINISTRATOR’S CIRCULAR 0-4-12

4.1 The “MAKE-Model” designation shall be unique from all other Identification Plate Approvals (IPA), and the “MAKE” name used should not be likely to be confused with other vehicle manufacturers or include vehicle type terminology, such as RV, 4WD and similar.

4.1.1 For a *new vehicle motorhome*, make and model designation shall be in accordance with Circular 0-3-3 “Motor Vehicle Make and Model Designation”.

4.1.2 The “MAKE-Model” designation of a SSM *motorhome* shall be as set out in Circular 0-4-6 clause 3.2.

4.1.3 The “Model” designation of all *motorhome* IPAs shall include qualification as a **Motorhome** or as a **Campervan**, for example:-

- a *motorhome* SSM modified “ALPHA Beta” might be designated “ABC ALPHA Beta **Motorhome**” as appropriate, or
- a completed vehicle *motorhome* might be designated “ALPHA Beta **Motorhome**”.

4.2 For a *used imported vehicle*, make and model designation shall be as specified under the relevant Specialist and Enthusiast Vehicle Scheme (SEVS) ruling. Refer to Circular 0-2-12.

5. AUSTRALIAN DESIGN RULE EVIDENCE

5.1 As a consequence of the determined *motorhome* Vehicle Category as per clause 3.1, those ADRs are applicable as determined in accordance with clauses 5.2 and 5.3 below.

5.2 Australian Design Rule applicability is as follows:-

5.2.1 For a completed *new vehicle motorhome* the applicability date of ADRs is the *date of manufacture*. In the case of a locally built vehicle this is usually the date the Identification Plate is affixed.

5.2.2 For an SSM *motorhome* the applicability date is the date that the SSM Identification Plate is affixed however, reference should be made to Circular 0-4-6 clause 4 for additional arrangements that apply to Second-Stage-of-Manufacture IPA.

5.2.3 For a *motorhome manufactured* from a *used imported vehicle*, the applicability date of ADRs is :-

- if either the *used imported vehicle* or the subsequent *motorhome* has greater than twelve *designated seating positions* or has a GVM greater than 12.0 tonne, the date the *used import plate* is affixed; or
- if both the *used imported vehicle* and the subsequent *motorhome* have twelve *designated seating positions* or less, and have a GVM of 12.0 tonne or less; the date on which the *imported vehicle* was originally built.

Note: The start date of the SEVS eligibility period (refer Circular 0-2-12) for the *used imported vehicle* make-model is deemed to be the *date of manufacture* of the vehicle model for the purposes of establishing ADR applicability where that applicability depends on when the model was first produced.

5.3 Where an SSM IPA *motorhome* application changes the ADR *motorhome* Vehicle Category from the original completed first-stage vehicle, then the SSM IPA shall comply with all the ADRs applicable to the completed SSM *motorhome* Vehicle Category, as at the date of the issue of the SSM IPA, subject to 5.2.2 above.

6. MOTORHOME GROSS VEHICLE MASS

ATTACHMENT A – ADMINISTRATOR’S CIRCULAR 0-4-12

6.1 The *motorhome* shall have a *Gross Vehicle Mass (GVM)* appropriate for its purpose, and shall include the following allowances within its *laden mass*, regardless of the determined Vehicle Category:-

- a Maximum Loaded Vehicle Mass (of a passenger vehicle) as per the Australian Design Rule definitions, where reference to a “seating position” means a “designated seating position.”
- all supplied equipment such as toilet, refrigerator, shower, gas-bottle etc. including the mass of full fluids/gas. Where waste (grey and black) water tank(s) are provided, their mass may be reduced by the mass of the water stored in any fresh water tank(s).
- a Personal Effects Allowance, to cover cooking utensils, bedding, luggage and other such items, of 60kg for each of the first two sleeping berths, and 20kg for each sleeping berth more than two. This shall be in addition to that included within the *Maximum Loaded Vehicle Mass (of a passenger vehicle)* above.

Note: This *laden mass* allowance should be distributed as appropriate to the build of the *motorhome* as determined by the *motorhome manufacturer*, but with the Personal Effects Allowance distributed 50/50 per *axle group* for the purpose of determining certified *Gross Axle Load Rating (GALR)*.

7. DESIGNATED SEATING POSITIONS

7.1 The number of *designated seating positions* shall be equal to, or greater than the number of sleeping-berths provided within the *motorhome*.

7.2 It is preferable that all *designated seating positions* are forward or rear facing.

8. SEATS, SEATBELTS and SEATBELT ANCHORAGES

8.1 Generally, *motorhomes* will be configured to provide a number of *designated seating positions* in addition to the driver’s and front passenger seats. These seats may double in use as seats for dining or recreation and in some cases convert to sleeping-berths. They may also be capable of swivelling to better suit their intended multiple use function.

- It will be a condition of all *motorhome* IPAs for a durable and permanent label or plaque to be affixed to the *motorhome* in a readily visible location with the following information in 6mm high lettering:-

THIS MOTORHOME IS DESIGNED FOR THE CARRIAGE OF (*) PERSONS

{ A seating plan showing all provided seats, with an “ X “
shown on all seating positions that are NOT designated
seating positions }

WARNING : THE SEATING POSITION(S) SHOWN BY “ X “ ON THIS LABEL

MUST NOT BE OCCUPIED WHILE THE VEHICLE IS IN MOTION

- A copy of this label/ plaque shall be included within the supplied Owner’s Manual.

8.1.1 If multiple seating layout variations are to be included within an IPA, then as appropriate, multiple labels/ plaques shall be provided.

8.2 All *designated seating positions* shall fully comply with the requirements of ADR 3/xx, ADR 4/xx and ADR 5/xx or the Motor Vehicle Standards (Approval to Place Used Import Plates) Determination as applicable.

ATTACHMENT A – ADMINISTRATOR’S CIRCULAR 0-4-12

8.2.1 If a swivelling-seat is used in a *designated seating position*, it shall be easily lockable without the use of tools in position(s) as intended for *use in transport* and ADR compliance must be appropriate to that locked position(s).

- It will be a condition of all *motorhome* IPAs that if a swivelling seat is able to be locked in a position other than as certified as a *designated seating position*, then a durable and permanent label is to be provided in a visible position adjacent to the seat, in 6mm high lettering as follows:-

WARNING : THIS SEAT IS ONLY TO BE USED IN THE (FORWARD/ REARWARD/ etc * - as appropriate)
FACING POSITION WHILE THE VEHICLE IS IN MOTION

- A copy of this label shall also be included within the supplied Owner’s Manual.
- 8.3 Seats provided, in addition to those *designated seating positions*, are not required to be ADR compliant, and shall not be provided with seatbelts, child-restraint anchorages or any other equipment that may imply they are for *use in transport*.
- 8.4 Child Restraint Anchorages (CRAs) shall be provided and certified as required for the *motorhome* vehicle category as per 3.1 above, and if additional CRAs are provided they must also be included within the *motorhome* certification.

9. GLAZING MATERIAL

9.1 ADR 8/xx specifies certification requirements for all glazing material used in the external and internal construction of a motor vehicle. Other than for all vehicle windows, ADR 8/xx shall only apply to glazing material that is within the *head impact area* (disregarding the reference to ‘nonglazed surfaces’).

Note: Non complying glazing which is outside the *head impact area* must be restricted to glazing which is essential to the use of the vehicle, except where separated from all designated seating positions by room or cupboard doors, and must be identified as such within the ADR 8/xx submission.

10. LIQUEFIED PETROLEUM GAS (LPG)

10.1 ADR 44/xx specifies certification requirements for LPG used both as a fuel for motor vehicles and also for installed equipment, such as stoves and refrigerators.

10.2 *Motorhome* manufacturers should also establish any additional requirements regarding LPG installations with the relevant State and Territory registration authorities.

11. GENERAL SAFETY

11.1 ADR 42/xx covers various general safety requirements relevant to *motorhomes*, with certification requirements determined by vehicle category as per clause 3.1 above. Doors as in clause 44.8.1, may make reference to ADR 58/00 clauses 58.5.3 and 58.5.4, and for access steps clauses 58.7.2.3, 58.7.2.4, 58.7.3 and 58.7.4, for guidance.

11.2 *Motorhome* manufacturers should also establish any additional requirements with the relevant State and Territory registration authorities, in particular with respect to electrical power systems and remote connections, smoke detectors, fire blankets and similar types of equipment.

ATTACHMENT A – ADMINISTRATOR’S CIRCULAR 0-4-12

11.3 In addition to the tyre placard requirements of ADR 42/xx the tyre placard (or an additional supplementary placard) shall display the *Gross Axle Load Rating (GALR)* of each *Axle* or *Axle Group*.

12. CERTIFICATION EVIDENCE REQUIREMENTS

12.1 Applications for *motorhome* IPA or Used Imported Plate Approval shall provide the following evidence in addition to the normally required SE, SF, Road Vehicle Descriptor (RVD) and Vehicle Inspection Certificate (VIC) submissions, as appropriate.

12.1.1 Applications shall have attached to referenced ADR 44/xx evidence, or for *new vehicles* include within an SE44/xx blank form:-

- a *motorhome* floor/ seating plan, including drawings or sketches supported by photographs, showing all seating positions and provided seats, identifying type/ purpose of seat, whether being a *designated seating position* or not, and if so, type of seatbelt assembly provided. This plan drawing should also show fitment position of label(s) below.
- a facsimile of the label(s) identifying seating capacity and positions of all *designated seating positions*, as per clause 8.1 above
- a facsimile of label(s) regarding swivelling seats as per clause 8.2.1 above, if fitted.
- a facsimile of the owner’s manual section showing the label(s) as per clause 8.1 and clause 8.2.1 above.

12.1.2 Applications shall include the following mass and load details attached to the ADR 31/xx or ADR 35/xx evidence (as applicable to *motorhome* Vehicle Category clause 3.1 above):-details of the declared *GVM*, as per clause 6, for each RVD variant or VIC, as applicable.

- calculations of the individual *axle group loads* and the corresponding *GALR* and *GVM* for each variant.
- evidence showing that all tyre ratings and *manufacturer’s* axle ratings are suitable for the *GALR* and *GVM* for each variant.
- the *motorhome* unladen mass.
- a copy of a weigh-bridge certificate showing *axle loads* of each *motorhome* variant at its *unladen mass*.

12.1.3 The RVD or VIC shall have included in the space provided for “Remarks”, a description of the *motorhome*, or for a SSM *Motorhome* a description of the SSM modifications.

- advice shall also be provided for each variant, of the individual *axle group loads*, as per 12.1.2 above.

12.1.4 Calculations to determine Vehicle Category declared within the CA form or VIC are to be provided attached to the RVD or within the VIC in the space provided for “Remarks”. Calculations shall cover each variant, as per clause 3.1, clause 6.1 and the number of *designated seating positions*.