

RVSA Implementation Consultation Framework

Concessional RAV Entry Consultation Group

Meeting 2

10:00am – 12:30 pm | Thursday 28 March 2019

Holiday Inn Sydney Airport | Corner O’Riordan Street & Bourke Road,
Mascot NSW

Outcomes

Participants

Chair - Sharon Nyakuengama (SN), General Manager, Vehicle Safety Standards Branch (VSS), Department of Infrastructure, Regional Development and Cities

Infrastructure

Alison Watson (AW), Director, Regulatory Design and Operational Implementation, VSS

Graham Evans (GE), Director, Program Support and Stakeholder Engagement, VSS

David Morton (DM), A/g Director, Regulatory Design and Operational Implementation, VSS

Christopher Karas (CK), Assistant Director, Regulatory Design and Operational Implementation, VSS

Stephen Spencer (SS), Director, Standards Review and Maintenance, VSS (by phone)

Phoebe Jones (PS), Regulatory Design and Operational Implementation, VSS

Industry

Organisation	Representative/s
Ascend Strategic Counsel	Peter Greenwood
Australian Automotive Dealer Association	Alex Tewes
Australian Historic Vehicle Interest Group	Doug Young
Australian Imported Motor Vehicle Industry Association (AIMVIA)	Jack Sandher Kristian Appelt
Australian Road Transport Suppliers Association (ARTSA)	Dean Abram
Australian Trucking Association	Paul Walsh
Bus Industry Confederation (BIC)	Michael Kearney Charity Arunuchalaa

Caravan Industry Association of Australia (CIAA)	Anne Campbell Victor Jundis
Council of Motor Clubs	Tom O'Donnell
Daimler Truck and Bus	Steven Ghaly
Federal Chamber of Automotive Industries (FCAI)	James Hurnall
General Motors – Holden	Rob Dyer
Heavy Vehicle Industry Australia (HVIA)	Greg Forbes
Mercedes Benz	Ellen Boyle
National Heavy Vehicle Regulator	Peter Austin
Nichibo Australia	Don Rossell
OT Solutions	Tom Eley
Queensland Department of Transport and Main Roads	Anant Bellary
RAWS Association	Rob Ogilvie Trent McMahon Murray Robertson
Subaru Australia	Hiep Bui
Toyota Motor Corporation Australia	Daniel Pegler
Truck Industry Council (TIC)	Mark Hammond Chris Loose
VicRoads	James Soo Danilo Messias Sacha Abeysekera

Apologies

Organisation	Representative
Assistive Technology Suppliers Australia	Caroline Reid David Sinclair
Australian Automotive Aftermarket Association	Stuart Charity
Australian Historic Motoring Federation	Christine Stephens Neil Athorn
Hino Australia	Barry Noble
Honda Australia Motorcycle and Power Equipment	Greg Snart

Welcome and introductions

SN welcomed the Concessional RAV Entry Consultation Group, gave some introductory comments regarding the making of the Road Vehicle Standards Rules in February 2019, and provided an overview of the session. She thanked participants for their attendance.

Discussion paper CR2 – campervan and motorhome conversions – Model Report guidance

Discussion paper CR2 was circulated to participants of the Concessional RAV Entry Consultation Group by email on 1 March 2019 and on the department's website.

CK delivered an overview of the discussion paper. The Consultation Group considered the matters raised in the paper and the discussion questions as follows:

Q1 – 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 be 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.**

There was general consensus that there should be different minimum features for campervans and motorhomes, and that there should be additional minimum features for motorhomes over the campervan features.

The Consultation Group discussed the market for ‘lower-spec’ campervans and requirements relating to these. There was broad acknowledgement that there is a desire in the market for basic vehicles without high-end features and a need to balance this with a minimum required level of features that are permanent. CK acknowledged this and said the department's intention is to settle on reasonable arrangements for permanent features in campervans and motorhomes in consultation with industry.

Participants considered the proposed minimum requirements for cooking facilities in some detail.

- The current fit-out for Jucy campers was discussed. These campervans include a pull-out kitchenette at the back without a permanently fixed stove. Permanency requirements for cookers might not be suitable for these vehicles as, for example, permanently fixed gas stoves on these campervans require yearly certification from state and territory gas regulators.
- The cost of gas certification of about \$300-400 per year was noted. It was also explained that portable gas appliances are easier to operate, in particular for tourists who are accustomed to using portable gas cookers in campervans overseas.
- There was a general lack of support from the Consultation Group regarding requirements for permanently fixed cooking equipment for campervans, although there was more support for this requirement in motorhomes.

Participants also considered minimum requirements for access to living accommodations:

- Single access via the front passenger door of a cab chassis could be acceptable.
- Reasonable access through the cab is currently passing as a left hand door.
- A minimum walkthrough requirement from the cab to the living quarters could be fairly permanent and be measured in the same way it is for ADR 58 regarding bus access doors and emergency exists, where a gauge has to be able to be passed through without touching anything.
- There are vehicles without completely separate living area access doors – requirements regarding left hand side access doors may need clarification.
- Requirements regarding access generally require better definition.

Participants identified particular risks associated with the modification of heavy vehicles into motorhomes, in particular the risk that there would be a loophole for a motorhome to be imported, and then converted back into a cab chassis for another purpose. The concerns of some participants regarding heavy vehicles that currently enter Australia via the existing RAWs scheme were noted. Participants and the department discussed controls on this, including:

- Ensuring the definition of a motorhome captures cab chassis vehicles, and imposing higher minimum requirements on motorhomes than campervans.
- Applying higher minimum requirements for some vehicles, for example, on the basis of vehicle category or vehicle mass.
- Requirement for AVV verification.
- State and territory government controls at the point of registration and in-service regulation.

Q2 – If the department imposed a minimum volume for water storage, how should this be worked out? E.g. Enough to carry 48 hours of water for each designated seating position (~5L per designated seating position?)

Participants of the Consultation Group did not consider this matter in detail.

Q3 – 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?

Participants of the Consultation Group considered the compliance of campervans and motorhomes with other regulations or Australian standards.

- A participant suggested that Model Reports need to include requirements that vehicles comply with other regulations that relate to those vehicles, for example, in relation to electricity, gas, hydraulics systems and refrigerants. Industry representatives advised that compliance with such state government regulations were required before vehicles could be registered.
- It was generally noted that the department could not ‘overstep the mark’ and regulate outside its jurisdiction, but also that points of provision and registration are key regulatory touchpoints with vehicles that other regulators lack control over.

- Jurisdictional representatives advised that they did not have the ability to undertake further inspections on vehicles prior to being supplied to the market, and suggested that this could be done by an AVV as part of their inspection against a Model Report. This approach was supported by industry representatives.
- The department stated that holders of AVV approvals will not verify compliance with other standards, for example, gas or electricity requirements set by state and territory governments. However, they could potentially verify that certain elements or fittings of the vehicle have been appropriately verified by other regulators.
- The department agreed to further consider its position regarding the compliance of campervans and motorhomes with other regulations and return to the Consultation Group with further details.

Q4 – Are the minimum features sufficient to ensure conversion is difficult to reverse?

Participants raised that there needs to be collaboration between the Commonwealth and states and territories to ensure that conversions to campervans and motorhomes are permanent.

There was discussion regarding how this collaboration could be facilitated.

- Participants and the department noted that it is in the collective interests of states and territories to ensure vehicles are used for the purpose they were originally intended.
- The role of in-service regulators at a state and territory level was discussed, including ensuring that the motorhome or campervan is used as intended and not converted for example, from a campervan back into a people mover. CK explained that if permanency requirements are not stringent enough then the burden falls back to in-service regulators to ensure the vehicles are used as intended. He also noted that AVV inspections were another tool to ensure modifications to such vehicles were permanent and that these vehicles would be used as intended.
- One participant queried whether the RAV will state whether a vehicle was entered on the RAV as a campervan or motorhome. CK explained that the RAV will set out what pathway the vehicle entered the RAV through (for example, the concessional RAV entry pathway) and the sub-category the vehicle was eligible under (for example, a vehicle to be modified by a RAW – effectively, a SEVs vehicle). Further, it will state information such as the number of seating positions, which will also assist in-service regulation. SS added that it would also state the Model Report number where applicable and the Model Report register will specify whether a particular Model Report is in relation to a campervan.
- It was suggested that the model name for the vehicle on the RAV could designate whether it was a campervan or a motorhome.
- CK noted that the department cannot regulate what happens to the vehicle after first provision to the market – the department cannot control the in-service use of vehicles. However, it can make requirements for campervans and motorhomes to have certain features that are difficult or expensive to fit and then remove, so as to reduce the likelihood that these vehicles will be converted back into the original vehicle type, such as people movers or light buses. It can also assist state and territory registration authorities with information to support their in-service regulation.
- The department agreed to explore options to make RAV entries for caravans and motorhome clearer regarding the purpose for which the vehicle was intended to be

used, noting the strong support for this expressed by some participants of the Consultation Group.

Demonstration of Road Vehicle Regulator (ROVER) system application forms

GE demonstrated two application forms relating to concessional RAV entry approvals. These were still in development but were intended to give participants some indication of the functionality that the system will offer and the kinds of applications that will be required to be submitted.

Participants raised the following key matters in relation to the demonstrated application forms:

- Question regarding whether the vehicle is new or used – what is the purpose of the question? How is it relevant and how is the information considered?
- Vehicle categories – these categories are unique to Australia. An applicant may only know the overseas vehicle category – the applicant may need more information to help them determine the correct vehicle category. The department noted that it will assess each application and an applicant choosing the incorrect category will not necessarily lead to a refusal of the application.
- Vehicle country of manufacture – it may be better to ask for which market the vehicle is manufactured.
- Vehicle make and model – it was suggested that the system could provide an option to click free text box ‘other’ to capture, for example, new vehicles that have not been updated in the system.
- Variant code – the term ‘variant code’ had a mixed reaction and was familiar to some but not others.

Key changes between Exposure Draft and final version of the Road Vehicle Standards Rules

PJ delivered a presentation regarding the key changes between the Exposure Draft of the Road Vehicle Standards Rules (December 2017) and the final version of the Rules (February 2019). Participants of the Consultation Group queried and discussed a number of the matters raised in the presentation, including the following:

Trailers eligibility criterion

There was significant interest and discussion regarding requirements for trailers and their entry via the concessional RAV entry pathway and the type approval pathway.

Participants identified a particular need for information regarding the limitation of concessional RAV entries for trailers to four light or four heavy trailers per year and the requirements (such as conformity of production) that relate to the importation or manufacture and provision of more than four trailers per year. The existing problems with the significant volumes of trailers being imported without the importer/supplier having links to the design and production facilities for these trailers was discussed.

The department agreed to provide further guidance, including at the next Consultation Group meeting, regarding requirements for the provision of trailers via the concessional RAV entry and type approval pathways, including explanation of the regulatory objectives of the different requirements (dependent on the volume of trailers being provided to the Australian market) that apply.

Non-RAV entry import approvals

There was discussion of a range of scenarios where a non-RAV entry import approval may be appropriate.

A particular issue was raised regarding the transfer of ownership of vehicles after importation of vehicles via a concessional RAV entry approval, but before entry on the RAV.

- Circumstances discussed include where the holder of a concessional RAV entry import approval dies or is otherwise unable to work on the vehicle once it enters the country to ensure it is 'fit for use on a public road', and the need for the transfer of ownership if the vehicle is security for a loan.
- The department agreed to continue to consider these issues and provide guidance regarding its position and potential solutions.

Other matters

Future meetings

SN noted that outcomes of this meeting would be circulated to the Concessional RAV Entry Consultation Group participants for comment before a final version is put onto our website. She encouraged any comments or questions regarding implementation of the RVSA and Rules to be directed to the RVSAimplementation@infrastructure.gov.au inbox.

SN noted that the next meeting of this group will likely be in June 2019.

Ref. #	Item	Lead	Action required	Action status	RM Ref #
CR2a	Discussion paper CR2 'Campervan and motorhome conversions – Model Report guidance' – policy development	Department of Infrastructure, Regional Development and Cities (the department)	Continue policy development regarding minimum features for campervans and motorhomes, and return further information on the policy, noting: <ul style="list-style-type: none"> • General consensus of the Consultation Group that there should be different minimum features for campervans and motorhomes, and that there should be additional minimum features for motorhomes over the campervan features. • General lack of support from the Consultation Group regarding requirements for permanently fixed cooking equipment for campervans, but more support for this requirement in motorhomes. • Consultation Group considers access requirements require better definition. • The department has agreed to further consider its policy regarding compliance of campervans and motorhomes with other regulations or other Australian standards (e.g. in relation to gas). 	Agreed – open	
CR2b	Discussion paper CR2 'Campervan and motorhome conversions – Model Report guidance' – RAV entries	Department	Explore options to make RAV entries for caravans and motorhome clearer regarding the purpose for which the vehicle was intended to be used, noting the strong support for this expressed by some participants of the Consultation Group.	Agreed – open	
CR2c	RVS Rules – trailers	Department	Provide further guidance, including at the next Consultation Group meeting regarding requirements for the provision of trailers via the concessional	Agreed – open	

			RAV entry and type approval pathways, including explanation of the regulatory objectives of the different requirements (dependent on the volume of trailers being provided to the Australian market) that apply.		
CR2d	RVS Rules – transfer of ownership of vehicle before entry on RAV	Department	Consider issues regarding the transfer of ownership of vehicles after importation of vehicles via a concessional RAV entry approval, but before entry on the RAV, and provide guidance regarding the department’s position and potential solutions.	Agreed – open	
CR2e	Key changes between Exposure Draft and final version of the Road Vehicle Standards Rules	Department	Make slides from presentation available to Consultation Group participants	Open	
CR2f	Further feedback and comments on outcomes	Consultation Group participants	Provide any further feedback on discussion papers, comments on outcomes document and proposed action items by COB 3 May 2019 to RVSAimplementation@infrastructure.gov.au	Open	
CR2g	Further feedback and comments on outcomes	Department	Incorporate further comment into outcomes document for circulation to the Consultation Group and posting on department’s website.	Open	