

The Hon Josh Frydenberg MP  
Treasurer  
PO Box 6022  
House of Representatives  
Parliament House  
Canberra ACT 2600

28 January 2021

Dear Treasurer,

Thank you for the opportunity for Caravan Industry Association of Australia to offer a submission to the Australian Government Treasury Office for the 2021-22 Federal Budget.

The submission offered below is based on insights developed in close consultation with our member state Associations and industry businesses.

The following submission outlines the top seven priorities for a robust caravan and camping industry which will strengthen regional tourism and domestic manufacturing while supporting the 6,000 businesses and 50,000 employees that make up the sector.

Yours faithfully,



Stuart Lamont

CEO

Caravan Industry Association of Australia



## 2021 FEDERAL PRE-BUDGET SUBMISSION

PREPARED FOR: AUSTRALIAN FEDERAL TREASURER

THE HON JOSH FRYDENBERG MP

29/01/2021



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## About Caravan Industry Association of Australia

Caravan Industry Association of Australia operates as a member-funded, non-for-profit industry association with a vision 'to lead and champion a robust, compliant and sustainable caravanning & camping industry'. Caravan Industry Association of Australia represents more than 6000 businesses across the supply chain of the caravan industry from manufacturing & supply side enterprises, to tourism delivery businesses including caravan parks and RV rental companies.

The Association welcomes the opportunity to provide a submission to the Federal Government highlighting the key priorities for the Caravan Industry across the sectors of tourism and manufacturing for consideration and inclusion within the 2019-20 Federal Budget.

## Summary of Recommendations

### **Manufacturing Sovereignty & Road Safety**

- 1) RVSA Education Program
- 2) National Caravan Safety Check Days

### **Future-proofing Industry**

- 3) Caravan Industry Investment Scheme
- 4) Electric Vehicle Charging Points for Caravan Parks
- 5) Concessional Loans for Tourism Businesses Impacted by Business Disruption
- 6) Adoption of Insurance Changes for SMEs
- 7) Funding Certainty for Tourism Research Australia

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## Why Support of the Caravan Industry should be a Core Economic Stimulus Priority

**The Australian caravan and camping industry is a \$23 billion industry that, in 2019, directly employed 53,000 people, manufactured 25,000 vehicles, and serviced over 740,000 vehicles on the road. The sector generated 12 million trips and created 60 million visitor nights across the country.**

The tourism industry has been the hardest hit industry in Australia's COVID-19 recession with JobKeeper so far disguising most of the full extent of the devastation of employment in this industry. As a labour-intensive sector and with resulting employment a much higher share of jobs in regional areas, the decline of tourism is the major economic problem facing regional Australia. Without a tourism recovery, many regional areas of Australia face inevitable ongoing economic depression.

The caravan industry is calling for a cessation of hand-outs to the tourism industry with a transition to supporting businesses that have a strong chance at success in the coming years. However, there remains a need for the federal government to provide safety nets to businesses that are at risk of closure due to circumstances beyond their control. These circumstances include State borders closing with minimal notice and breakouts/declarations of 'hot spots' from key source markets have the ability to destroy a business that otherwise remains commercially viable.

On the other side of the caravan coin, the manufacturing sector has gone from 20% capacity during the extended lockdown period in Victoria, to an explosion of demand that businesses are now struggling to keep up with and adapt to. There is a distinct opportunity to harness this growth and expand on it to further extend the number of Australian made recreational vehicles on Australia's roads, while enhancing the export opportunities of the sector as well.

The caravan and camping sector has been the first part of the visitor economy to bounce back, with September quarter of 2020 data highlighting that the caravan industry accounted for 8.1M nights around regional Australia, more than any other accommodation type. This marks a record high in terms of market share for the industry and demonstrates the integral connection between regional Australia and caravan and camping.

Caravan Industry Association of Australia is calling on the government to adopt a future facing budget that prioritises projects that will fast-track the recovery of regional economies and play a part in the long-term sustainable growth of Australian Tourism.

With the core elements of economic growth over the past decade linked to strong population growth due to immigration and the housing boom, and both these elements unlikely to fuel growth in the coming year; this budget is the greatest opportunity for Australia to adopt bold strategies that will fuel innovation, stimulate growth and create jobs around the country, post the ending of JobKeeper.

These two pillars entail a total of six proposals that will stimulate the Australian economy sustainably over the medium-long term as well as providing a major short-term stimulation.



## 2021 Budget Recommendations

### 1) Manufacturing Sovereignty & Road Safety

- a. **RVSA Education Program:** A program delivered to both consumers and industry about the changes to the Road Vehicle Standards Act that will be introduced in the coming 12 months.
- b. **National Caravan Safety Check Days:** Establish a series of days around Australia where caravan owners can undergo a free-of-charge safety check with an approved compliance officer.

### 2) Future-proofing Industry

- a. **Caravan Industry Investment & Upgrade Scheme.** This will assist caravan parks in upgrading facilities to attract new consumers and incentivise caravan manufacturers to expand their factory capacity to deal with increase in consumer demand for caravans and caravan experiences.
- b. **Subsidies for Caravan Parks to install Electric Vehicle chargers.** With the growth of EVs in Australia, this will provide vehicle owners confidence that charging facilities will be available at caravan parks so potential travellers are not anchored to their homes, cities or key highways, thus helping regional dispersal.
- c. **Concessional loan system for tourism businesses:** Made available for businesses that are impacted by border closures and 'hot spot' definitions. This would operate to maintain cashflow and would be paid back as conditions improve.
- d. **Develop Insurance Mechanisms to Support Businesses**  
Caravan Industry Association of Australia calls for the government to acknowledge the findings from the SME Ombudsman and provide a solution for businesses requiring insurance where the market is currently failing.
- e. **Funding certainty for Tourism Research Australia:** The support of Australia's peak tourism research body is sorely needed in times of crises and boom; with the demand for timely, relevant and accurate data paramount to business planning at a sector level and an individual business level. An extra \$1 million per annum is requested for TRA, recognising the increased need to monitor the economic health of the regional tourism industry.

These proposals strongly support the Government's goal for economic recovery in coming years especially in regard to supporting Australian job creation in vast areas of regional Australia and for youth and women. The following section highlights how around half Australia's regions will remain in economic depression without a tourism recovery.



## Tourism as a job's mainstay of Australia's regional economies

Of the 68 regions outside Australia's capital cities, a third (23) had more than 10 per cent of jobs **directly** linked to tourism, as shown in Table 1 below. As a share of total regional employment due to total impacts of visitor spending.

This excludes the indirect jobs created by tourism spending, which is generally estimated to increase the employment share by up to a third.

Caravan and camping in these regions is intrinsically linked to the recovery, with all these regions (except Gold Coast) receiving more than 10% of holiday nights from caravanners and campers in the year-ending September 2020. 15 of these regions received more than 20% of holiday night from caravan and camping.

*Table 1: Regions with a **direct share** of total regional jobs of more than 10% and the reliance on caravan and camping of these regions.*

Region	% Tourism Direct Share of Employment	% of holiday nights from caravan and camping
<b>East Coast (Tas)</b>	60%	25%
<b>Spa Country (Vic)</b>	45%	18%
<b>Lasseter (NT)</b>	39%	36%
<b>Kangaroo Island</b>	38%	12%
<b>Phillip Island</b>	36%	13%
<b>High Country (Vic)</b>	24%	34%
<b>Snowy Mountains</b>	23%	22%
<b>Whitsundays</b>	22%	27%
<b>East Gippsland (Lakes)</b>	18%	38%
<b>Upper Yarra</b>	18%	68%
<b>West Coast (Tas)</b>	15%	18%
<b>Litchfield/Kakadu/ Arnhem</b>	15%	53%
<b>Coral Coast (WA)</b>	14%	60%
<b>Great Ocean Road</b>	14%	34%
<b>Fleurieu Peninsula</b>	14%	24%
<b>Tropical North Qld</b>	13%	18%
<b>South West (WA)</b>	12%	31%
<b>Central Murray</b>	12%	58%
<b>Central Highlands</b>	12%	54%
<b>Blue Mountains</b>	11%	15%
<b>Katherine and Daly</b>	10%	82%
<b>Gold Coast</b>	10%	4%
<b>Sunshine Coast</b>	10%	17%

Source: Tourism Research Australia (2020), Regional Tourism Satellite Account & National Visitor Survey.

This demonstrates the reach across regional Australia's areas facing an extended tourism led depression that policies supporting the caravan industry will have on regional economies and job recovery. This document will now highlight the vital role that manufacturing, and road safety can play in Australia's recovery from the COVID induced recession and the positive impacts this will have on consumer safety and tourism experience.



## Priority One: Manufacturing Sovereignty & Road Safety

Australia's manufacturing sector has an opportunity to drive Australia's economic recovery out of the COVID crisis and, with an increasing focus on manufacturing sovereignty, the RV manufacturing sector is ready to play its part in the COVID recovery. However, this will require a kick-start from government in the wake of COVID shutdowns in Victoria and other negative impacts on demand. Simultaneously, an increased focus on road safety, especially as it relates to recreational vehicles, is required as consumers look to purchase into the RV market.

In 2019, for the tenth consecutive year, there were more than 20,000 recreational vehicles manufactured in Australia. During this period, the industry has gone largely under the radar of governments; not once requesting financial support from the government, which is in stark contrast to the other automotive industries. The sector continues to employ tens of thousands of Australians and is committed to keeping Australian manufacturing processes onshore and to grow.

In recent years increased numbers of imported recreational vehicles have entered Australia, and while this has contributed to the overall market growing in terms of recreational vehicles; there has been minimal benefit for Australian manufacturers. COVID-19 has only exacerbated this trend, with latest import data (October 2020) being the highest single month of import on record with more than 1500 vehicles imported for the month, eclipsing the previous record of 1100 (May 2018).

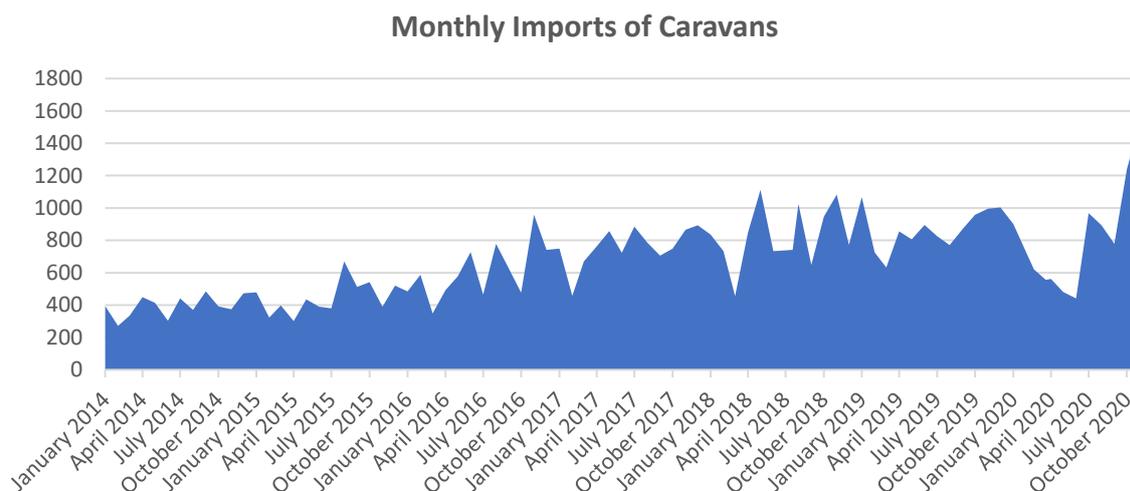


Figure 1: ABS Statistical Classification: Trailers and semi-trailers of the caravan type, for housing or camping.

Local manufacturing, in July 2021, will undergo the largest change in 30 years with the updated RVSA legislation to be enforced from this date. Caravan Industry Association of Australia is urging the government to invest in an education program that will continue to help manufacturers improve their compliance records and develop their processes so

- 1) Safer RVs make their way onto Australia roads
- 2) More Australian RVs are exported

The second point is indicative of a rising trend that is seeing more Australian made RVs make their way onto the roads of North America, the Middle East and Europe.



The quarterly value of exports of RVs reached an all-time high by the end of 2019, after growing from less than \$200,000 in Q1 2012, to \$11.5M in Q4 2019. This growth can be cultivated and assisted with opportunities for the manufacturing sector to grow in Australia and develop their manufacturing.

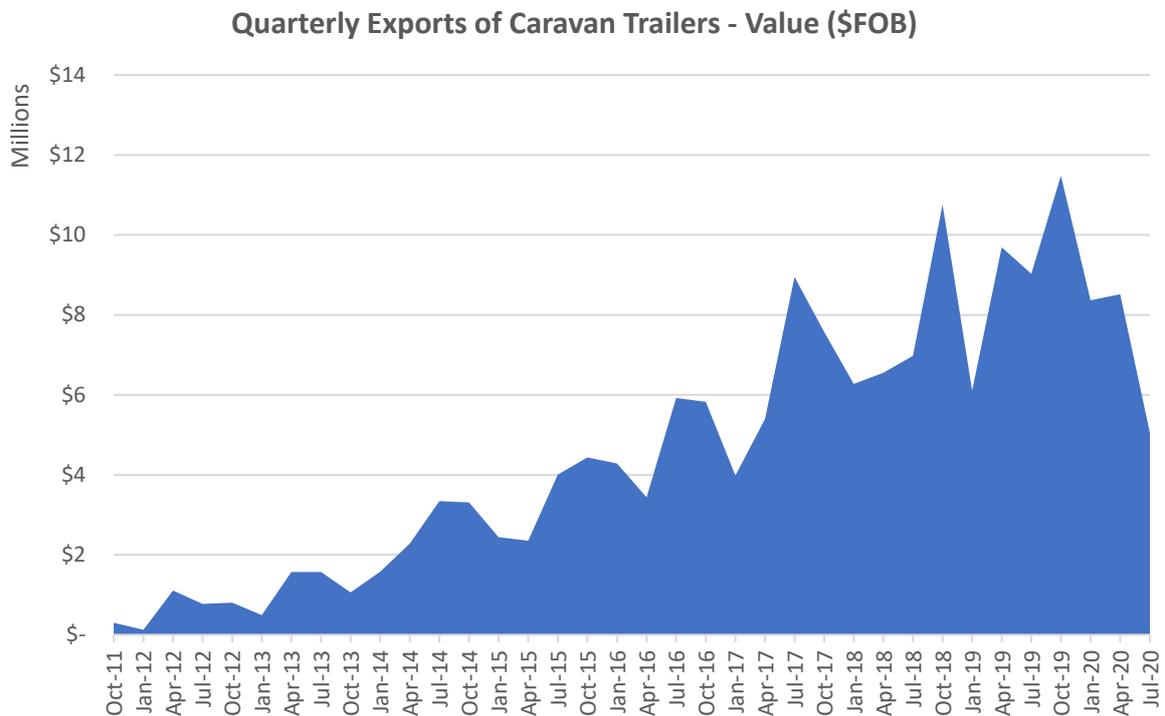


Figure 2: ABS Statistical Classification: Exports of the caravan type, for housing or camping and parts thereof.



## Proposal One: Support an education program for the RV industry regarding changes to the Roads Vehicle Standards Act

### Rationale

Improving the road safety of high mass vehicles is a policy priority in Australia. This extends to recreational vehicles such as caravans and motorhomes/campervans. Implementation is scheduled for July 1, 2021 for the newly passed legislation (Road Vehicles Standards Act, 2019) which will ensure that safer product makes its way onto Australia's roads; whether this be locally manufactured or imported product.

Road Vehicle Standards Act (RVSA) was passed in December 2018 to upgrade the regulations regarding the manufacturing and importation of RVs in Australia. This will be vital to ensure that only new vehicles which comply with Australian safety standards make their way on to Australian roads. The new legislation will positively impact the RV industry in the longer term but requires major and expensive reforms in many local companies manufacturing design.

The timing of the introduction of this change in standards has been made more challenging for the industry with its coincidence with the impact of the COVID recession on the manufacturing capacity of the Australian industry, with most facilities closed for months with 80% of manufacturing supply chains reliant on Melbourne based facilities. Despite this, the industry remains committed to the July 1st deadline.

Caravan Industry Association of Australia works closely with Vehicle Safety Standards (VSS) as part of the Department of infrastructure to educate our industry as to their obligations. However, in the coming 12 months, much more promotional effort will be required as the commencement date for the RVSA approaches at a time when the industry is focused on commercial survival.

### Explanation

Currently, Caravan Industry Association of Australia sits on six committees with VSS and two committees chaired by Standards Australia. The Association is involved in rewriting the current Vehicle Standards Bulletin following changes to the legislation. To effectively manage these changes, an education campaign needs to be presented for the RV industry. The education program will ensure Australian businesses are equipped with knowledge for a smooth transition to working under the new legislation.

Due to the uncertainty regarding COVID, and the national scope of these changes, the vast majority of this campaign will need to take place online; however, when the time is right, this needs to be combined with face-to-face workshops and seminars to assist Australian manufacturers in meeting their new obligations.

### Amount

- \$650,000 (+10% administration costs) over two years

*Table 5: Proposed Education Program for RVSA*

Item	Cost
2x Engineers to facilitate the program	\$360,000
Development of Online Resources	\$50,000
Educational Road Show (1 per state each year) including travel costs	\$140,000
Development of Marketing campaign to consumers	\$100,000
Administration Costs (10%)	\$65,000
<b>Total (Over two years)</b>	<b>\$715,000</b>



## Proposal Two: Support a National Caravan Safety Road Safety Check Scheme

### Explanation

Improving the road safety of high mass vehicles is a policy priority in Australia, which needs to address the needs of businesses and consumers.

Caravan Industry Association of Australia is proposing to establish two days – immediately prior to Easter and Christmas holiday periods – where consumers can take their caravan for a safety check-up day. These dates are the most popular dates for consumers to go caravan and camping, with a significant portion of the 750,000 RVs registered in Australia on the road during this time.

### Rationale

A caravan safety check day, in each state of Australia, will help educate consumers around safe towing principles and their responsibilities on the roads.

This proposal can be undertaken by Caravan Industry Association of Australia in partnership with member state associations and can be heavily marketed through various consumer channels. State Associations have access to the personnel and locations that are suitable for a nationally conceived event.

Item	Cost
Marketing Campaign boosting awareness (digital & print)	\$300,000
Set up of two sites per state (twice during the year)	\$500,000
Equipment costs	\$50,000
Administration Costs (10%)	\$80,000
<b>Total (Over two years)</b>	<b>\$880,000</b>



## Priority Two: Future-Proofing Industry

**With the tourism industry gradually coming out of hiatus, there is a need for targeted investment in supporting businesses that are going to drive Australia out of the COVID-induced recession as well as the provision of safety nets to ensure these businesses do not close due to circumstances beyond their control.**

Currently, there are hundreds of shovel ready projects in caravan parks and manufacturing facilities that have been put on hold due to COVID-19 and subsequent restrictions. With the increased demand, especially in heavily toured areas such as the Great Ocean Road, NSW North & South Coasts, Australia's South West and other, often coastal, areas; investment in expanding the footprint of caravan parks and ability for these parks to cater to more visitors will maximise the economic returns felt by their respective communities.

Similarly, expansion of RV manufacturing facilities to cater for the increase in demand, and bolster the export capability of businesses will create improved opportunities for business growth in this sector, as well as attracting international investment to Australia.

The growth of electric vehicles in Australia remains a massive opportunity for regional Australia, however, with the exponential growth in the EV sectors, there is not the same growth in enabling infrastructure (such as charge points) in Australia's regions.

Tourism Research Australia and Tourism Australia, as the key government agencies for measuring & marketing Australian tourism locally and internationally, require an increase of funding to continue to market to the local market and measure provide visitor insights of travellers.





## Proposal Three: Caravan Industry Investment Scheme

### Overview

Caravan Industry Association of Australia is proposing the provision of matched capital expenditure grants to support facility upgrades and investment in caravan parks and RV manufacturing facilities. These grants will facilitate infrastructure upgrades and improve a destination's value through capacity development and improved product offerings.

This will support employment in tourism, construction and manufacturing, and create economic linkages in regional Australia while boosting the manufacturing productivity of the RV industry which will assist the growing export market.

### Rationale

This proposal would reinvigorate investment spend by caravan parks and greatly increase the number of jobs in regional areas, as the building of a cabin for example, not only supports the initial construction, but subsequent maintenance and cleaning personnel, having an extensive economic flow-on benefit to the wider local community. It also provides increased capacity and destination attractiveness for visitation linking to increased sales at local food and beverage, fuel, retail and visitor attractions.

With an opportunity to revive domestic travel, it is imperative that regional destinations can offer increased capacity and improved product offerings to maximise the economic opportunities that will present in the coming months. Funding is urgently required to support business capital investment to ensure they provide more attractive options to bring consumer demand to regional Australia.

The RV manufacturing sector is currently struggling to satisfy demand for product from consumers, with many potential buyers of Australian made product turning to new imported product, which, while still beneficial from a tourism perspective, does not have the same economic linkages and impact as locally manufactured product.

Some examples of projects that would be eligible could include:

- Upgrading amenity blocks;
- Purchasing a new cabin for caravan parks;
- Upgrading Factory floor space for additional capacity to build new product;
- Purchasing upgraded equipment to streamline & improve manufacturing processes.

### Explanation

The proposed \$30M limit on investment from the Federal Government would need to be matched by industry businesses. This proposal would be to provide a grant of up to \$500,000 that would be matched 1:1 by the business for a capital expenditure project (i.e., a depreciated item – not installation labour) to a maximum of \$500,000 per grant.

Key details of this proposal are:

- The Fund to reimburse up to 50% of expenses of a capital expenditure project in regional accommodation (i.e., a depreciated item – not installation labour), to a maximum grant of \$500,000 per business.
- Designed strictly for 'Shovel Ready' projects that will finish before the end of 2021.
- Managed by the department on a first in basis where over-subscription occurs.



- Alternatively could be managed by the Caravan Industry Association of Australia under strict guidelines similar to the arrangement with Department of Health [Defibs subsidy scheme](#).

<b>Item</b>	<b>Amount</b>
Project Cost (Federal Investment)	\$30,000,000
Project Cost (Industry Contribution)	\$30,000,000
Administration Costs (If managed by Caravan Industry Association of Australia)	1%
<b>Total Federal investment</b>	<b>\$30,300,000</b>



## Proposal Four: Subsidize Charging Points for Electric Vehicles in Caravan Parks in Regional Australia

### Rationale

The coming decade will see increased adoption of electric vehicles (EVs) with 14,727 currently registered, an increase of 52% from the previous year (Australian Bureau of Statistics, 2020). With this advancement, comes a challenge for Australia in the lack of charging points around the country, especially in regional areas. Drive tourism represents 76% of all domestic tourism in regional Australia (TRA, 2020) and to ensure that future EV owners are not anchored to urban Australia and that drive tourism continues to flourish in the age of electric vehicles, investment into the provision of charge points is sorely required.

Currently there is approximately one charging point for every six EVs in Australia; this pales in comparison to other countries such as the Netherlands (one charging point for every two EVs). Regional Australian accommodation providers, such as caravan parks, are ideally placed to provide charging stations as research highlights that overnight charging points are the most preferred method of recharging as opposed to 'charging on the go' at places such as fuel stations (NEM, 2018).

### Explanation

Caravan Industry Association of Australia is proposing a 50% subsidy be made available for caravan parks to install electric vehicle chargers, capped at a maximum 1000 chargers total for the program's duration and a max of two (2) per park that applies.

With EV charger costing on average \$3,000 to a business<sup>1</sup> this would cap the overall investment from the federal government to \$1.5M plus an administration cost if the scheme is to be rolled out by Caravan Industry Association of Australia. All remaining funds would be returned to the department.

Item	Cost
1,000 EV Chargers	\$1,500,000
Administrations (5%)	\$75,000
Total Federal Investment	\$1,575,000

<sup>1</sup> <https://evse.com.au/blog/evchargercost/>



## Proposal Five: Concessional Loan system for tourism businesses suffering from border closures & Hotspots

### Rationale

Caravan Industry Association of Australia is proposing that concessional loans be made available for businesses that are impacted by border closures and 'hot spot' definitions. This would operate to maintain cashflow and would be paid back as conditions improve for the business in a similar fashion to the HECs/HELP loan scheme for students. (i.e. low interest, long-period)

### Overview

This loans scheme could operate on similar thresholds to JobKeeper, however over a shorter period of potentially fortnightly compared to a comparable fortnight the year prior.

This would aim to mitigate the worst impacts of a sudden border closure or the 'switching off' of a core source market due to a 'hot spot definition'. These emergency loans would be repaid once the business returns to profits which are commensurate with a similar period in a previous year.



## Proposal Six: Adoption of Insurance Recommendations from SME Ombudsman

### Rationale

Access to affordable and adequate insurance coverage is crucial to the ongoing viability of the sector. However, in recent years, caravan park operators (and other tourism enterprises) are increasingly expressing their difficulties in obtaining coverage, excessively high premiums, limitations on policy extensions and reduced options in the market. Affordable and adequate insurance coverage is important for business to ensure they can protect their employees, their consumers and their operations. Issues regarding Natural Disaster and Public Liability Insurance are particularly damaging to the caravan park sector, where there is a distinct market failure in the lack of available insurers and, as a result, competition.

### Explanation

Caravan Park operators, who are fully regulated by relevant state and federal legislation regarding work health and safety, are not seeking to avoid their responsibility regarding public liability and natural disaster management. They are however seeking a consistent framework that ensures their significant investments and liability are able to be protected. Specifically, operators require:

- I. Access to adequate policy coverage that clearly defines the provisions included;
- II. Guarantees that any coverage provided will not be revoked without consideration given to a operators needs to find additional insurance provisions;
- III. That coverage is available in the market and if not, the government will examine the creation of a mechanism to ensure operators remain insured.

The recommendations by the Ombudsman made in December 2020, are a step in the right direction to support the caravan park industry, and Caravan Industry Association of Australia are calling on the federal government to adopt these recommendations.

Specifically, expanding the Australian Reinsurance Pool to cover all-natural disasters and adopting statutory caps on public liability will provide ongoing confidence to operators that they will be able to find and be covered by adequate policy.



## Proposal Seven: Restore funding certainty for Tourism Research Australia

### Overview

In times of crisis, access to data is vital so industry can react with confidence knowing that the insights they receive are accurate. With more and more data points available to industry; it is vital that TRA remains the source of truth for the industry and is funded to maintain its ability to collect and distil insights that operators and the broader industry can act on.

### Rationale

Tourism Research Australia (TRA) provides an important service for the Australian tourism industry through their National Visitor Survey (NVS) and International Visitor Survey (IVS). TRA requires an increase in funding to improve the scope of both surveys so data can be increasingly trusted at a regional and SA2 level.

An increase in funding for TRA also facilitates the exploration into new methodologies that can potentially capture richer data that benefits the industry and government. Alternative possible data sources are problematic outside the major cities due to small sample sizes (such as the replacement to the ABS Survey of Tourist Accommodation) or rely on measures that are influenced by changing consumer behaviour such as the switch from cash to credit card payments with the virus. In any case these alternative measures can't provide the range of data necessary for sound investment and marketing decision making in regional Australia.

Tourism Australia (TA) should also receive increased resources for marketing to expand their services including ongoing domestic marketing campaigns. Caravan Industry Association of Australia supports the ongoing expansion of Tourism Australia's mandate to include domestic tourism as the industry rebuilds. This ongoing funding for domestic campaigning is in addition to the funding sought under proposal 4.

### Amount

- An increase in funding for TRA of \$4M over the next four years to allow additional research and improved data collection including monthly reporting.

## Contact

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