

# Importing RVs

**G**ary Bailiff's well-written article in the October 2005 edition of *The Wanderer* caused me to hasten research into an article on this subject. Seemingly I was not alone, as virtually before I started, the CMCA forwarded a letter to me from Colin Young, Executive Officer of the Recreational Vehicle Manufacturers Association of Australia regarding this very matter.

Rather than continue to produce what frankly would have been a less authoritative article myself, the RVMAA has graciously allowed me to edit and present Colin's letter as a Tech Notes article. I am presenting it in this manner as it raises very serious issues that deserve wider exposure than in letter form.

I have made a number of changes. All have been seen and approved by the RVMAA. Some are simply to bring the letter into article style. A few changes were deemed prudent for legal reasons and in one matter (identified in the text) the RVMAA provided anecdotal evidence of one seemingly very dubious business practice. A few technical matters have been expanded.

Whilst the RVMAA clearly represents the interests of the Australian RV manufacturing industry, it stresses that it is not opposed to RV imports.

My own experience is limited to inspecting various imported vehicles, and correspondence with a substantial number of buyers.

It seems clear that many importers make every effort to ensure products meet Australian Design Rules. But others equally clearly do not. Upon measuring the overall

width of one fifth wheeler, and finding it several centimetres over the legally permitted maximum, the salesman told me my steel tape measure was faulty. And, as the RVMAA points out, photographs of some imported RVs provide visual evidence of non-compliance.

## Problems with Non-Compliance

The Recreational Vehicle Manufacturers Association of Australia receives a substantial number of communications from owners and potential owners of imported vehicles stating that they cannot get ex-US motorhomes or fifth-wheelers registered, or get the registration transferred. The main concerns relate to serious non-compliance with ADRs (Australian Design Rules) and/or other regulatory requirements such as the gas and electrical appliances, or their installation.

The RVMAA strongly advises CMCA Members to think very seriously before importing or buying an ex-US RV. Gary Bailiff's quantified listing of freight, duty, insurance, quarantine, air conditioning, refurbishing, etc, etc, along with stressing the possible deterioration of the vehicles, highlights important considerations when importing or buying.

The '15-year-old imports scheme' has indeed been amended. The age of permitted imports increases each year, hence the financial viability of bringing in a probably high-mileage vehicle must be thoroughly considered.

## The Need for Compliance

'Commercial imports' *must* be modified to comply with all ADRs (Australian Design Rules) that were in force when the vehicle was manufactured. While some ADRs are the same as the US FMVSS (Federal Motor Vehicle Safety Standard) requirements, some are different and generally more stringent. It can be very costly to modify these vehicles to comply fully... if in fact they can be modified at all. On top of this is the cost of obtaining an engineering certificate from an accredited professional automotive engineer.

Vehicles newer than 15 years old can legally be imported under the 'personal imports' scheme, if the vehicle owner is qualified to do so. This requires *proof* that they have legitimately owned and used the vehicle overseas for a continuous 12-month period. In such a case, the vehicle does not have to demonstrate compliance with *all* ADRs, but it still must be modified to comply with some ADRs and other regulatory requirements. Here, despite the less-stringent requirements, it may not even be *possible* to modify the vehicle, and in any event, the cost and time involved can be considerable.

In all cases, it is imperative to obtain written quotes from professional vehicle conversion companies in Australia before you consider buying any vehicle overseas and importing it into Australia.

## Beware of Scams

The RVMAA has certain knowledge of scams relating to 'personal imports' schemes that purport to facilitate arrangements for Australians travelling overseas and then 'buying' an RV that is subsequently imported.

Before entering into any such 'personal import' arrangement check with the Federal Department of Transport (Vehicle Imports) to confirm that the compliance plate and vehicle import approval are legitimate.

*Take this very seriously. The RVMAA states that a substantial number of FORGED personal import compliance plates and vehicle import approvals have been used to enable vehicles to be registered. The RVMAA provided me with the actual details of one such scheme – but the specifics cannot be revealed here - CR.*

It is common knowledge in the industry that many people have been caught unaware of what they were buying or importing, and have experienced major financial problems with imported vehicles that do not comply with the relevant ADRs and other Australian Standards. Photos of imported vehicles that are for sale (and advertised in various magazines) clearly show many that do not comply for various reasons, including that of dimensional requirements.

An as yet unknown number of imported vehicles - both motorhomes and fifth-wheelers - have been (incorrectly) registered in the first place. Some clearly non-complying vehicles have been issued with engineering certificates. Some clearly breach dimensional limits.

Whilst these breaches were seemingly not detected when the vehicles were presented for initial registration there have been many cases within recent months when non-complying vehicles were detected when registration was attempted to be transferred; this is especially an issue if the registration transfer is to another State or Territory. Such matters may well end up with ongoing legal battles over who is legally liable in the event of a vehicle being deemed non-compliant and subsequently unable to be used on the road.

## Main Areas of Non-Compliance

The main non-compliance with some ex-US imports include:

- Too wide (over the permitted 2.5 metres)
- Too much rear over-hang (the maximum allowed is the lesser of 3.7 metres or 60% of the wheelbase)

- Not enough ground clearance (between the axles) and/or not enough rear angle of departure (ground clearance).
- An entry door being on the right-hand side of the vehicle, and not on the left-hand side - and also doors that (illegally) open inward.
- The right-hand-drive conversion not being in accordance with VSB-6 (Vehicle Standards Bulletin No. 6) for vehicles over 4.5 tonne GVM.
- Windscreens not having sufficient light transmittance (tinted too heavily).

Some of the state vehicle registration (such as VicRoads & RTA VSI (Vehicle Standard Information) legislation) is at:

- NSW: [http://www.rta.nsw.gov.au/registration/downloads/vsi/vsi\\_dl1.html](http://www.rta.nsw.gov.au/registration/downloads/vsi/vsi_dl1.html) VSI 05
- VIC: <http://www.vicroads.vic.gov.au/vrne/vrne5nav.nsf/FirstChild/-EEC8092FE0E5478FCA256FD300241C39> VSI 3, 5 & 23

All caravans and camper-trailers (manufactured since 1989) must comply with VSB-1. This can be obtained from:

- <http://www.dotars.gov.au/transreg/vsb/index.aspx>

(or simply by entering VSB-1 in Google and ticking the 'I feel lucky box' - CR).

VSB-1 dictates all of the ADRs and Australian Standards that these vehicles must comply with. It covers carrying capacity, couplings, safety chains, axles, suspensions, brakes, wheels, tyres, dimensional limits, mudguards, and the extensive requirements for all of the lamps and reflectors.

## Safety Issues

All recreational vehicles must be safe. Just because imported vehicles may comply with overseas regulations, there is no guarantee that they will comply with Australian safety regulations. It is a highly contentious topic as to why we do not have mutual-recognition with all overseas standards, but it has to be remembered that there are some very valid reasons why we have different and usually more stringent, requirements... particularly in matters relating to gas and electricity.

Two vital safety areas that must be completely understood when considering buying or importing an RV are whether all of the electrical and gas appliances – and more importantly, their installations – comply with the Australian Standards.

*(That the vehicle is registered is seemingly no guarantee. One registered fifth-wheeler on the trade display at a CMCA Rally had a 240-volt system that contravened Australian requirements in several major respects. Upon querying this, the salesman stated he did not care and that - 'it passed rego mate' - CR).*

It is a requirement that a licensed electrician and a licensed gas fitter must inspect and approve every RV. There has been a lot of concern regarding the appliances and installation in imported recreational vehicles and the local manufacturing industry has been worried that a disaster with one of these units would be devastating for the industry. Most pleasingly, State and Territory regulatory authorities are well aware of the concern and are being most professional in ensuring that everything is being done to ensure that the highest levels of safety are achieved.

## The RVMAA's Position

The RVMAA does not oppose the importation of RVs, but it strongly recommends that prospective buyers demand (preferably via a legally-binding document - CR) that imports meet the same standards of safety as that required of locally-made vehicles.

As has been said many times before... when it comes to buying or importing an RV: Buyer Beware!

## Acknowledgement

The CMCA thanks Colin Young and the RVMAA for allowing their letter to be edited and presented in this manner. Colin Young is a chartered professional automotive engineer and quality auditor. He has extensive experience in vehicle safety and ADR compliance. His brother (Ian) is a Western Australian Member of the CMCA.

For further information about the RVMAA – see [www.rvmaa.com.au](http://www.rvmaa.com.au) 

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