



Call for Evidence – Haulage Permits and Trailer Registration bill

1. Introduction

This submission has been made by John Lally, Director General of the National Caravan Council on behalf of the National Caravan Council, its subsidiary company NCC CRiS (Central Registration and Identification Scheme) and on behalf of the Approved Workshop Scheme which is a tripartite arrangement between the NCC, the Camping and Caravanning Club and the Caravan and Motorhome Club.

2. **The National Caravan Council** (the NCC) is the trade association representing the touring caravan, motorhome, caravan holiday home and residential park home industries in the UK. Formed in 1939 the NCC now has in excess of 850 companies in membership and covers the entire supply chain including manufacturers, dealerships, workshops, holiday/residential parks and suppliers of specialist services and products. The NCC also runs two of the largest consumer exhibitions in the UK with a marketing reach of almost 1 million households and an exhibitor list of 700 companies the majority of which are stakeholders in our industry.

2.1 The caravan industry is one of the success stories of the UK economy. The industry turnover and related consumer spend is in excess of £7 billion per annum. Over 130,000 people are employed in the industry which serves nearly two million caravanners, and it is a major contributor to the local and national leisure and tourism economies across the UK.

2.2 With over 95% of caravan products manufactured here in the UK, the touring caravan sector is the largest category of non-commercial O2 trailers in the UK (units between 750kg – 3,500kg).

2.3 The NCC is submitting evidence in relation to the Haulage Permits and Trailer Registration bill because we have concerns that Part 2: Trailer registration as presented, is unclear and presents profound uncertainty for the millions of caravanners, horse box, marine, motorbike trailer users who enjoy these hugely popular means of leisure activity, as well as the hundreds of companies and thousands of employees who support these successful industries.

Specifically the bill:

- a) creates uncertainty over whether government is to introduce compulsory or voluntary registration for trailers (other than those defined as 'commercial') and
- b) introduces further uncertainty over whether compulsory registration or periodic testing will be necessary for relevant trailers (over 750 kg).

2.4 All in the trailer business will very much appreciate the importance of delivering an appropriate mechanism for the HGV industry to ensure the safe and smooth passage of goods across international borders post Brexit. However, it is vital that the Bill Committee recognises the severe impact of extending this legislation to the millions of privately owned trailers used for leisure purposes such as caravans, boat trailers, horsebox trailers, motorcycles and car trailers – the vast majority of which will be used solely for domestic use.

2.5 The UK is facing an economic uncertainty as the date for exiting the European Union draws close; there is a marked downturn in the sales of touring caravans and further, unnecessary, barriers to entry of leisure trailer ownership, such as caravans, is of deep concern.

2.6 The NCC would like government to preserve the status-quo in relation to the existing voluntary registration scheme in place for our sector (caravans weighing between 750kg and 3,500 kg) and to recognise the importance non-legislative measures such as user-education and regular maintenance and servicing that could be applied in relation to trailer safety.

3. Executive Summary:

- The NCC requests that the Bill Committee consider introducing an amendment to the bill in support of Option 1 set out in Government's Briefing Paper: Haulage Permits and Trailer Registration Bill [HL] 2017-19 which provides a degree of certainty over which trailers will be subject to compulsory registration.
- If voluntary registration of trailers weighing over 750kg and not more than 3500kg is to be considered, the NCC can see little benefit in creating a secondary scheme operated by the DVLA which would lead to confusion in the sector. In our sector alone this would leave 870,000 consumers unsure of who to contact to register their caravan - the established CRiS or DVLA.
- The NCC asks that CRiS, an established, robust voluntary registration scheme for caravans is considered as a viable option for all non-commercial trailers in use both domestically and abroad.
- In welcoming the review into trailers safety, the NCC supports practical, proportionate and effective measures aimed at improving trailer safety **if** this is supported by clear evidence.
- To ensure that government fully appreciates the importance of education and user awareness of operating a trailer safely when assessing the need for periodic testing.

4. Registration of trailers

- 4.1 The bill does not, at present, indicate whether registration of trailers will be compulsory or voluntary, creating uncertainty. The House of Commons Library Briefing dated 10 May 2018 '*Briefing Paper: Haulage Permits and Trailer Registration Bill [HL] 2017-19*' does, however, provide some clarity on which vehicles will be subject to mandatory registration in Option 1, page 24.
- 4.2 We propose that Option 1, on Page 24 of the '*Briefing Paper: Haulage Permits and Trailer Registration Bill [HL] 2017-19*' is issued as an amendment to the bill to be considered before the House of Commons.

5. Central Registration and Identification Scheme (CRiS)

- 5.1 The UK caravan industry, through the NCC, has had the benefit of its own industry registration scheme since 1992 (over 25 years). CRiS is the National Register of UK touring caravan keepers, similar to the DVLA. It is recognised by government and regulatory bodies such as the Driver and Vehicle Standards Agency (DVSA) and Department for Transport (DfT), the police services through the National Vehicle Crime and Intelligence Service (NaVCIS) and leading insurance/finance companies.
- 5.2 CRiS now retains in excess of 870,000 keeper records; registers over one-third of all O2 trailers and 70 per cent of all non-commercial (leisure) trailers. The industry scheme is very important for caravan owners because:
- its high security registration certificate proves the owner is the registered keeper
 - it links the caravan (asset) using its 17digit VIN to a CRiS registered keeper
 - the high security provision deters theft and aids recovery via imbedded RFID technology supported by visible VIN tamper evident labels
 - it works effectively with law enforcement agencies in UK and Europe and NAVCIS (police vehicle crime department)
 - manufacturers rely on the CRiS scheme for product recalls
 - the CRiS database links with banks/finance companies, so trade/consumers can check for outstanding finance
 - the CRiS database links with insurance companies regarding damage or repair history and is used to verify a claim
 - its dedicated business support team investigates any attempt at duplicate registrations on an asset.

- 5.4 There is 24/7 access for both consumers and law enforcement agencies, and the provision for law enforcement includes keeper details / previous keeper details / finance / insurance reports and stolen reports. This provision is made available directly to a portable device – mobile phone etc. for instant access.
- 5.5 The CRiS system is supported by a very secure Registration Document which benefits from our unique VINCHIP RFID system. In cases of suspect caravans, this offers law enforcement agents the opportunity to carry out a ‘timely’ inspection which then leads to identification and confirmation in a very short period of time, therefore reducing the need for law enforcement officers to spend unrealistic amounts of time ‘searching’ for hidden identification features when the original factory markings have been removed.
- 5.6 CRiS is technologically advanced and in many ways exceeds the Vienna Convention requirements by providing free of charge, online and face-to-face training and RFID and UV equipment to the police and law enforcement agents.
- 5.7 The high security CRiS registration document already goes much further than the Vienna Convention requires (copies can be sent to the committee). Security features include custom-made NCC CRiS hologram, thermochromic patch, ultraviolet watermarking and a Quick Response (QR) code that links to the CRiS database. There are 28 individual security features which have been used thousands of times throughout each CRiS registration document. The CRiS registration document is a far more secure than a standard DVLA V5 document, which is likely to be the basic document called for in ratifying the Vienna Convention.
- 5.8 If a second number plate is deemed necessary, CRiS is able to issue number plates, but requires DVLA to provide a bulk feed of registration numbers, as it already does to the car/motorcycle dealers. CRiS can then issue registration numbers to dealers and upon the sale of a particular trailer assign a VRM (vehicle registration mark) and issue a compliant number plate to the dealer for it to be affixed to the rear panel of a caravan. CRiS can via API make this data available to all authorised government agencies. CRiS welcomes the opportunity to effectively reduce the cost and time-pressure off taxpayer money and government resources with minimal disruption.
- 5.9 The NCC understands that the DVLA has not yet costed the price of running a registration scheme. The NCC remains concerned about the potential cost forced upon consumers for whom the use of the trailer is a hobby and lifestyle of choice. There is a real risk that consumers may see such a move as the ‘thin end of the wedge’ and a means to introduce future taxation for leisure trailers creating yet another barrier to ownership of leisure trailers.
- 5.10 The NCC is concerned that should the Bill committee support the introduction of a voluntary registration scheme operated by DVLA, the possible increase in additional jobs in Swansea, will result in the demise of the CRiS scheme and job losses in the Chippenham constituency area.

If, however, consideration could be given to CRiS covering the voluntary registration requirements for non-commercial O2 trailers this would lead to additional employment opportunities in the Chippenham constituency area.

- 5.11 The NCC is concerned with the delivery timelines surrounding plans for a registration scheme. The indication at present is that such a scheme may not be ready before March 2019. If the report into trailer registration is due one year after the bill receives Royal Assent, it is suggested that, potentially, no decision on trailer registration will be taken before June 2019, which would be after Britain formally withdraws from the European Union. If it is decided to make registration compulsory for all non-commercial trailers in the UK- CRiS can offer a contingency plan to make up for this shortfall between March and June 2019.
- 5.12 Should such a transitional period be introduced, the NCC questions why government would then impose a second registration scheme operated by DVLA which could serve to undermine CRiS. Rather than creating two schemes, a point which has been questioned in the House of Lords debate of the 18 April, by Baroness Randerson and in the second reading in the House of Commons on 14 May by Alan Brown MP, and Michelle Donelan MP, the NCC asks that if a compulsory registration scheme is to be applied to all non-commercial trailers, that CRiS be offered the opportunity to apply to become a government appointed registration provider to cover all non-commercial trailers.
- 5.13 To that end, we propose the following amendment, or amendment to the effect of:

Page 9, Line 3 – Between “trailer-related road accidents” and “in the United Kingdom”, insert:

‘And the necessity to introduce a government-run registration scheme in addition to a robust, established registration scheme for trailers.’

6. Trailer Safety and the Approved Workshop Scheme (AWS)

6.1 The UK caravan industry welcomes a review of trailer safety and the NCC supports practical and effective measures aimed at improving road safety *if* supported by clear evidence. The touring caravan sector is the largest single category of O2 trailer and, as a consequence, is swept into measures considered for other trailers. Caravanners largely are proud and attentive owners who would not want to run the risk of towing a caravan that was unsafe.

6.2 Government’s trailer safety review should include the following points:

- a) A means of determining what percentage of accidents relate to mechanical failure vs user behaviour

The NCC believes that the majority of caravan (perhaps other trailer..) accidents occur due to 'use' factors (such as inappropriate weight match of towing vehicle/trailer, incorrect attachment, poorly distributed loading or inappropriate speed) rather than pure roadworthiness factors such as mechanical failure. A MOT type test would not prevent 'user' behaviour related accidents.

- b) A means of determining what percentage of the existing MOT stations could realistically undertake periodic inspections on high sided trailers and the investment necessary to provide appropriate facilities.

The NCC understands that not all MoT stations that test Class 4 cars have the facilities to test larger Class 4 vehicles like campervans and motorhomes - so there may be a very limited choice of testing stations available for high sided trailers – such as caravans. Also, the cost of training examiners and adapting test centres could be extremely high.

- c) To review the comparative analysis of serious accident rates in other member states e.g. Germany (where a form of MOT-type testing of caravans has been in place for many years) and the UK, where testing is not currently required.

The NCC understands that roadworthiness testing introduced in Germany has little or no impact on the number of serious accidents with trailers.

- 6.3 If, as suspected, many trailer related accidents are a direct result of user behaviour then the NCC and the wider trailer community should work together, sharing best practice, and converge on a national campaign (led by Highways England) to better educate trailer users on the critical points of safe towing e.g. correct weight ratios, correct attachment, correct distribution of weight etc.

- 6.4 A caravan (trailer service) is far more thorough than a MOT e.g. the removal of brake drums and replacement of parts. There is a triparty enterprise in place between the NCC, The Caravan & Motorhome Club and the Camping & Caravanning Club called the Approved Workshop Scheme - see below.

7. **The Approved Workshop Scheme (AWS)**

- 7.1 The AWS was established in 1978 and now comprises 473 workshops servicing and repairing trailers and caravans across the UK. Of these 473 approved workshops, 267 are fixed base workshops and 206 are mobile workshops. There are a team of 6 independent assessors, each with over 30 years' experience assessing workshop environments for both the auto-motive and caravan / motorhome industry.

The scheme is currently the only one of its kind in the UK to be recognised and supported by all the major UK manufacturers for servicing during the warranty period. The scheme is also supported by the major continental brands of leisure vehicles.

- 7.2 The AWS is a robust, independently assessed servicing scheme for caravan trailers in the UK and should not be compared to other national servicing networks for trailers which do not give sufficient geographical coverage. The AWS technicians are trained to a far higher standard than a MOT tester (e.g. LPG gas installations, 12V and 230V electrical installation and of course the chassis/running gear).
- 7.3 To become a member of the AWS, workshops must provide evidence of the following qualifications:
- NCC / City & Guilds qualification in caravan and / or motorhome servicing.
 - A current LPG STGW gas qualification of ACS.
 - NCC / City & Guilds Inspection & Test qualification of electrical installations.
 - NCC / City & Guilds LV / ELV Systems, Equipment & Circuits qualification.
- 7.4 Workshops must also adhere to a set of strict Terms and Conditions and an independently assessed Code of Practice.
- 7.5 The distribution of workshops across the United Kingdom is shown on the following map:

AWS Members








7.6 The NCC suggests that the AWS could become an integral part of the forthcoming report on trailer safety.

8. Conclusion

- 8.1 To conclude, the NCC is deeply concerned with the initial approach towards trailer registration in the Haulage Permits and Trailer Registration bill as outlined above.
- 8.2 We believe there is a real lack of understanding of the diversity within the trailer industry. This is underlined by the absence of any media coverage of the bill (outside that of the larger haulage units and their trailers) and significantly the wider implications for the wider trailer sector.
- 8.2 We thank the committee for allowing us to submit this Call for Evidence and look forward to the results of the committee.
- 8.3 As Director General of the National Caravan Council, I would be happy to be called as a witness to further explore with the committee any part of this evidence or to discuss our response with individual Members of Parliament.
- 8.4 The NCC looks forward to working with the Department for Transport and Parliament on this bill and its subsequent report to the House.

Appendix 1

Trailer Types					
	O1	O2 Leisure	O2 Non-Leisure	O3	O4
Masses	≤750 kg	>750 – ≤3,500 kg		>3,500 kg – ≤10,000 kg	>10,000 kg
Annual UK Sales / Registrations	Unknown	34,000 (22K CRIS registered)	31,000	20,000 total – mostly O4	
					
NCC Proposal	N/A	Voluntary Registration		Mandatory Registration Applies	
Haulage Permit & Trailer Registration Bill		Scope of Proposed Bill			

O2 (>750 kg – ≤3500 kg) UK Trailer Market

Leisure

(mandatory registration should not apply)

Non-Leisure

(mandatory registration should apply)

Caravans	Marine	Equestrian	Vehicle Transport*	Utility & Specialist Trailers	Livestock	Building/ Plant
22,000 units	2,100 units	3,900 units	6,100 units	12,400 units	13,800 units	4,900 units
						

Examples

Rigid Folding Pop-up	Boat Jet-ski Canoe	Horsebox	Cars Quad-bike Motorcycle	Box Tipper High loader Skid Loader Catering Military Refrigeration	Sheep Cattle Dogs	Mini-digger Scaffold Cement Pump Compressor Generator
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Note – NCC has liaised with chassis manufacturers to categorise, and quantify, the different types of trailer manufacture in the UK – the figures are estimates and exclude those trailers exported