



NCC response to the Haulage Permits and Trailer Registration Bill gaining Royal Assent

1. 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.
2. The NCC vision is for a self-regulating caravan and park home industry that delivers a successful and competitive industry, high quality products and services, effective safety standards and a fair deal for consumers.
3. The NCC has more than 550 companies in membership and covers the entire supply chain including manufacturers, dealerships, workshops, holiday/residential parks and suppliers of specialist services and products.
4. The touring caravan, motorhome and caravan holiday home industry contributes more than £7 billion per annum to the UK economy and employs more than 130,000 people.

NCC Statements

5. The NCC is disappointed to see the Haulage Permits and Trailer Registration Bill gain Royal Assent in its current form. We have concerns that it has left Parliament with a worrying lack of clarity leaving our industry and its consumers confused as to Government's intentions regarding implications for domestic leisure trailers such as caravans, boat trailers and horse boxes.
6. The Bill also introduces an unclear proposal on Government intentions on trailer safety. Whilst the NCC welcomes a general review of trailer safety, any new measures must be proportionate and supported by clear and unambiguous evidence, and we urge the Government to be cautious as to how these are implemented should additional measures be necessary.

Trailer registration

7. The NCC remains concerned that any change to domestic trailer registrations (including caravan registrations) would severely impact the already established NCC CRiS service (Central Registration and Identification Service).
8. NCC CRiS is the National Register of UK touring caravan keepers, similar to the DVLA, and is recognised by regulatory bodies, insurance companies and government organisations such as the Driver and Vehicle Standards Agency (DVSA) and the Department for Transport (DfT).

9. NCC CRiS has been operating for more than 25 years and currently holds 870,000 records. The NCC sees no need to reinvent the process of registration for non-commercial O2 trailers that travel within the UK or internationally (750-3500 kgs) and is ready and equipped to deal with registration of other O2 domestic leisure trailers should Government deem it necessary in order to comply with the terms of the Vienna Convention 1968.
10. Immediately after the Bill was announced in February 2018, the NCC made direct representations to both the Secretary of State for Transport, Chris Grayling MP and Ministers Jesse Norman MP and Baroness Sugg. These were supported during the course of the Bill in both houses by additional representations from Baroness Randerson, Alan Brown MP, Michelle Donelan MP and Tom Brake MP with regards to how the Bill would adversely affect registrations within the caravan industry.
11. Ministers Jesse Norman and Baroness Sugg have given assurances that any Driver and Vehicle Standards Agency (DVSA) mandatory registration scheme (for O2 trailers travelling internationally) will not duplicate or replicate NCC CRiS. However, the Government remains non-committal on its direct intentions for all 'relevant trailer' registrations, which inevitably could include caravans.
12. Transport Minister Jesse Norman has stated that if registration for all relevant trailers were to become compulsory, any such service must be provided by a relevant government department in line with the requirements of the Vienna Convention (1968). The NCC asks Ministers to look again at the Vienna Convention to review its advice that a Government department must be in control of the register of trailers travelling internationally.
13. The NCC views the concept of mandatory registration as a confusing secondary scheme, inferior to the already established effective NCC CRiS service and one that could cost the taxpayer more than £15 million in funding.
14. The NCC is also disappointed that there has not yet been an announcement of any potential cost of registration to trailer owners. Suggestions have indicated that any cost could be upwards of £55 per trailer, which far exceeds the modest and competitive cost of registration through the established and technologically secure NCC CRiS scheme. The industry and consumers deserve more clarity.
15. The Secretary of State for Transport has committed to review which trailers will need mandatory registration. The NCC would welcome swift clarity from the Government on this point including a decisive definition of which O2 trailers will be included in this proposal.
16. NCC CRiS has a reputation in offering quality, robust registration procedures and has invested heavily in effective measures to recover lost or stolen caravans. NCC CRiS has more than 870,000 asset records and is expanding the service to include motorhomes and other domestic trailers. Consumers deserve greater assurance, security and protection of their asset and NCC CRiS is better placed to deliver this than a new over-priced Government operated mandatory registration scheme.

Trailer Safety Review

17. The NCC welcomes the review into trailer safety, and supports practical, proportionate and effective measures aimed at improving safety but this must be supported by clear evidence.
18. In supporting this proposal, the NCC also welcomes the amendments 5/6, which provide that any future report will also investigate causes of accidents and will recommend how to reduce accidents caused by human error.
19. The NCC believes that the Government's trailer safety review should include a means of determining what percentage of accidents relate to mechanical failure vs user behaviour.
20. The NCC is clear in its view that the majority of caravan accidents occur due to 'use' factors (such as inappropriate weight match of car to caravan, incorrect attachment, poorly distributed loading or inappropriate speed) rather than pure roadworthiness factors or mechanical failure. Any roadworthiness/MOT type test would not prevent user behaviour-related accidents.
21. The NCC welcomes the Government's proposal to distinguish between 'use' factors compared to roadworthiness when considering statistics related to trailer accidents.
22. The NCC believes the Government should review the comparative analysis of serious accident rates in other member states e.g. Germany (where a form of MOT-type testing of caravans is already established) and the UK, where testing is not currently required. The NCC understands that roadworthiness testing introduced in Germany has had little or no impact on the number of serious accidents with trailers.
23. The NCC believes that further public awareness, improved user education and collaborative work with the National Towing Safety Group through Highways England, and the Trailer Safety Summit led by Karin Smyth MP will have far better results in achieving improved trailer safety than any mandatory roadworthiness/MOT test.
24. As part of a joint enterprise with the Caravan and Motorhome Club and the Camping and Caravanning Club, the NCC provides a network of over 470 fixed and mobile workshops across the UK. The Approved Workshop Scheme (AWS) is now the UK's largest group of independently assessed workshops providing trained professional services to the towing community and is seen as the benchmark for motorhome and touring caravan servicing in the UK.
25. The NCC has serious concerns over the availability and suitability of existing mandatory MOT stations should roadworthiness mot tests become mandatory for the domestic trailer community. Such stations are ill -equipped to undertake periodic inspections on high sided trailers and not all MOT stations that test Class 4 cars have the facilities to test larger Class 4 vehicles like campervans and motorhomes. This severely limits the choice of testing stations available and will require considerable investment to provide appropriate facilities to adapt test centres (or for an Approved Workshop Scheme to convert) and to train examiners.

Final Comment

26. The NCC looks forward to continuing its engagement with the Government over trailer registration and safety and recommends that the Government:

- a) **excludes** domestic leisure trailers (O2) from any proposals to introduce mandatory trailer registration, and
- b) to broaden their review when examining what type of periodic testing it may recommend in its report, due within 18 months of the Bill's Royal Assent.

Overall, the NCC urges the Government to bring greater clarity to the Bill to allow the caravan industry and consumers to prepare for any significant changes.