

# **A Vision for GB Type Approval Response from the National Caravan Council (the NCC)**

## **Introduction**

The NCC is the trade association representing the caravan and motorhome industry in the UK. Membership comprises owners and managers of residential and holiday parks, touring caravan and motor caravan retailers/dealerships, suppliers and service providers to the industry and manufacturers of all four caravan products: touring caravans, motor caravans, holiday caravans and holiday lodges and residential park homes (mobile homes/residential caravans).

The UK's departure from the EU presents an opportunity to re-evaluate and enhance the regulatory framework for vehicle type approval. This new framework aims to balance maintaining high safety and environmental standards with reducing administrative burdens. Given the significant role of the NCC in the leisure vehicle sector, it is crucial that the new regulations consider the unique needs of this industry to ensure smooth transition and continued growth.

## **Executive Summary**

1. We would like to thank the Department for Transport for the opportunity to further engage as part of the consultation process on A Vision for GB Type Approval. We have considered all sections of the consultation in significant detail.
2. We acknowledge the aims of the consultation to create a new regulatory framework in Great Britain, adopting international UNECE standards, deregulation of low-risk areas, and the introduction of bespoke GB Type Approval regulations on vehicle safety, sustainability and technology.
3. The NCC takes the position that the best outcome for our industry would be full alignment with EU Whole Vehicle Type Approval (EUWTA) regulations. Common recognition between the EU and UK is essential and would greatly reduce the complexity of approving vehicles, eliminating the current duplication of efforts when homologating vehicles for sale in the UK, NI, and Europe.
4. Additionally, a streamlined and straightforward GB Type Approval process is essential to support our members, ensuring they can adapt without undue burden. We also firmly believe that a new 'National Type Approval' framework for ultra-small series vehicles is required, with an extended Individual Vehicle Approval (ICA) for converted motor caravans, incorporating necessary safety certifications.

5. The introduction of the new regulatory framework should also focus on facilitating innovation and supporting small and medium-sized enterprises (SMEs) within the leisure vehicle industry. Simplifying the approval process and reducing costs will help our members thrive and contribute to the UK economy.
6. The NCC advocates for continuous collaboration between Government and industry stakeholders to ensure the new type approval system reflects the practical realities and challenges faced by manufacturers and retailers. This collaborative approach will help in creating regulations that are both effective and practical, ensuring a smooth transition and minimal disruption to the industry.

## Overall Vision

### **Q.16 Do you agree or disagree with our overall vision for vehicle regulations?**

**Agree somewhat.**

### **Q.17 What aspects of the vision do you disagree with?**

We disagree with Principle 3 of the vision as the potential for bespoke domestic requirements or processes may create unnecessary and duplicative bureaucracy for our members to trade with European markets.

We believe that EU vehicle approvals, including EU Certificates of Conformity (CoCs), should be recognised within the GB Type Approval framework. UNECE regulations do not grant easements for small series and multi-stage build vehicles, which are essential to include in GB regulations.

From January 2023 – April 2024, 1,204 touring caravans and 294 motor caravans were sold for export in the EU markets. This represents a significant portion of our members' income; therefore, any revision to the GB Type Approval framework must counter any adverse impact on our sectors' ability to trade with the European market.

Additionally, the 'End of Series' provisions should be based on the date of manufacture rather than the date of registration. The current system risks new vehicles being scrapped or prematurely registered by manufacturers to avoid them being classified as second-hand, which a manufacture date basis would avoid.

## Vision – Three Principles

### Q.19 Do you agree or disagree with Principle 1?

Agree.

### Q.21 What other regulations and areas should be considered as part of Principle 1?

There are no additional regulations and/or areas that should be considered as part of principle 1. However, it is a key component of the proposal that any GB Type Approval is tailored to the existing UK market.

The NCC therefore recommends that EU 2023/535 – bearing Annex II – and EU 2022/2236 should be considered under principle 2 as they contain essential provisions on technological, software and regulatory updates that ensure type-approval processes reflect current industry standards. Existing UNECE regulations also overlook small series and special purpose vehicle requirements which are essential to maintain compliance with EU standards.

### Q.22 Do you agree or disagree with Principle 2?

Agree.

### Q.24 What subjects and areas are there which you would like to be considered under Principle 2?

The NCC acknowledges the importance of a flexible approach to recognising standards and testing from elsewhere in the world. However, it is critical that GB regulations reflect all pre-existing easements currently listed under EU regulations for multi-stage build and small series type approval.

Adopting UNECE regulations without reflecting existing easements would create an unnecessarily broad landscape for compliance. Failure to mirror the existing approach will result in confusion and unnecessary costs for both manufacturers and consumers, undercutting the UK manufacturing advantage in this sector.

For example, the NCC and wider automotive sector lobbied to remove the requirement for additional registration plates under EU 1003/2010 Registration Plate Space, whereas UNECE is unclear on how this regulatory restriction would apply.

Similarly, EU 1009/2010 Wheel Guards recognises the bespoke nature of the leisure vehicle sector and does not legally require the installation of wheel guards as they serve no purpose. Under UNECE, there is no easement for multi-stage leisure vehicles therefore reintroducing a requirement that is wholly redundant.

Existing practice further allows for multi-stage build vehicles to be type approved on the base mode alone whereas future proposals would require that every individual model of motor caravan, regardless of base vehicle safety compliance, would need to undergo pedestrian protection crash testing. This would generate an extraordinary cost and administrative burden for UK manufacturers.

See also our response to question 17 above that references EU 2023/535 – baring Annex II – and EU 2022/2236 which in our view should be considered under principle 2.

**Q.25 Do you agree or disagree with Principle 3?**

Disagree.

**Q.26 Explain your reasoning, providing evidence if possible.**

In short, the more the automotive industry, including leisure vehicles, diverges from the EU Whole Vehicle Type Approval (EUWVTA), the harder it becomes for companies operating in both the UK and Europe to maintain dual approvals. The UK leisure vehicle sector relies heavily on imported base vehicles from EU member states such as Spain, France, Italy and Slovenia.

The shift to GB Type Approval has already introduced complications, such as different VIN plates and CoCs for vehicles. This deviation increasingly burdens small and medium sized manufacturers without clear rationale on why a reserved GB type approval process is more beneficial. Harmonising requirements is therefore crucial to avoid duplicative efforts to facilitate UK-Europe trade in our sector.

## **Statutory Instrument Programme**

**Q.28 Do you agree or disagree with the priority areas outlined in the Statutory Instrument programme?**

Neither agree nor disagree.

**Q.30 What areas of the Statutory Instrument programme are essential to your priorities?**

- Passenger and goods vehicle type approval framework
- Automated vehicle type approval framework
- Mandating new vehicle safety technologies (for example advanced distraction warning, blind spot information)
- Safety related construction and use regulation amendments (retrofit of camera monitoring systems and maintenance of sideguards for heavy goods vehicles)

- Electronic certificates of conformity
- Future vehicle emission standards (Euro 7)
- UN regulations 155-6 (cyber-security and software updates)

**Q.31 What aspects of the Statutory Instrument programme do you think should be adapted?**

Safety related construction and use regulations should be adapted to address the growing trend of retrofitted campervans being converted from class N commercial vans to class M motor caravans. See further details in response to question 45.

## **Theory of Change**

**Q.37 what success metrics of the vision would you like to see recorded and reported on?**

The VCA should establish a publicly accessible database, both now and in the future, showing the number of Type Approval applications made on a regular basis, including the timescales to gain approval.

The rationale for this success metric is further supported by our response to question 38 and is essential for creating a straightforward process that works in the interests of UK manufacturers.

The Department should also monitor the total number of recalls made between the historical EUWVTA framework and the future GB framework, ensuring the highest level of safety and manufacturing compliance.

The automotive industry would benefit greatly from more granular detail on the number of road traffic incidents each year, in addition to the types of vehicles involved. Having access to this data will ensure any potential safety improvements are identified expeditiously, and our industry can convey our shared commitment to road safety to consumers.

## **Vision End-User Impacts**

**Q.38 Will the proposed reforms disproportionately impact any specific end-user groups?**

Yes.

**Q.39 Which end-user groups will be affected and how?**

As outlined in response to question 19, multi-stage build vehicle manufacturers will be disproportionately affected if existing EU regulation easements are not reflected in GB type approval. It is imperative that our safety and manufacturing standards mirror strictly those of our closest geographical neighbours and import/export markets.

## **Vision Challenges and Barriers**

**Q.40 What challenges may you face from these reforms being implemented?**

The UK is facing a skills shortage. It is critical that greater investment from Government is made to support and retain the next generation of technically skilled engineers, designers and manufacturers, especially ahead of any potential bespoke GB type approval framework.

Operating two Type Approval schemes will inevitably cause confusion for both consumers and manufacturers, potentially risking the safety of leisure vehicles. It is therefore imperative that the NCC and its Members are afforded time and resource to adapt to new type approval processes, recognising existing EU easements.

The NCC should also be recognised as a leading voice in the tourism sector, with a key focus on leisure vehicles, and regularly consulted ahead of any proposed amendments and/or Statutory Instrument programme developments.

**Q.42 Will our proposed reforms allow the sale of the same vehicle models and components in Great Britain as are expected to be available in Northern Ireland, without additional testing and approval?**

No.

**Q.43 What aspects of the reforms make you think this will not be achieved?**

The NCC is a UK Trade Association, with Members across all Devolved Nations and Europe. Adopting two separate Type Approval frameworks will necessitate manufacturers in Northern Ireland being required to meet ECWTVA and GB regulations. This would require a different VIN plate and CoC, duplicating the administrative work already required for vehicle registration and manufacture. This will be of significant detriment to small and medium sized businesses who do not have the technical capabilities to manage two parallel frameworks. Further information on the operational barriers is outlined in response to question 38.

**Q.44 What barriers will the proposed reforms potentially introduce to industry in accessing the:**

*GB Market* – For UK manufactured and retailed leisure vehicles, there will be little to no impact from the proposed reforms. However, this represents a very small portion of the overall leisure vehicle market. Most leisure vehicles will have numerous components, in addition to base vehicles, manufactured and imported from the EU and/or international markets.

*UK Market* – Please refer to our response outlined in question 35 and the impacts on UK(NI) manufacturers.

*International Markets* – As reflected across our consultation response, adopting multiple type approval frameworks for international markets will create a plethora of barriers, stifling the UK's competitive advantage in the leisure vehicle market.

## **Barriers to GB Business and SMEs**

**Q.45 Will the proposed reforms potentially introduce barriers to GB businesses and SMEs?**

Yes.

**Q.46 What barriers and who will be affected?**

UNECE regulations lack the easements for small series and multi-stage build vehicles found in EU regulations, which must be incorporated into GB regulations. Failure to do so will place GB businesses and SMEs at a financial disadvantage while steps are taken to deal with unnecessary bureaucracy.

It is wrong in principle that small series and multi-stage build vehicles should be considered duplicative under GB approval. All aspects should be considered low risk as the overwhelming majority of these vehicles already undergo strict evaluations conducted by base vehicle manufacturers. Therefore, the current allowances for EU technical services should be made permanent.

Currently, the Vehicle Certification Agency (VCA) is a significant barrier to obtaining approval due to both a lack of technical resources and the lengthy processing times experiencing for re/post registration.

The VCA currently accepts technical reports from EU bodies; however, these are subject to deadlines which force inefficient, redundant tests. Paradoxically, UNECE approvals from China are accepted without further checks unlike those from France, for example, which must undergo additional verification.

This inconsistency is leading to an uncompetitive UK export market and is impacting our members. We are also seeing an increased number of independent small motor caravan converters converting registered commercial vans into what would ordinarily then be classed an M1SA ‘campervan’; however, the vast majority fail to submit IVA re-registration documents to the VCA due to both response times and lack of enforcement.

Introducing a new GB Type Approval will only exacerbate existing resource pressures for the VCA. To address this, the VCA needs to be expanded with increased resources to train and upskill staff to handle the inevitable influx of applications. The expansion of the VCA is crucial to both meet the growth in the leisure vehicle sector in the UK and to address the post-Brexit backlog that has materialised. Failure to do so will effectively stifle our industry’s growth and innovation.

**Q.49 What barriers exist to increasing vehicle safety?**

Having multiple type approval systems could lead to confusion between vehicles being built for different approvals, potentially undermining vehicle safety.

**Q.50 Is there a need to provide additional regulatory measures and exemptions to support innovation and technology adoption for SMEs?**

Yes.

**Q.51 Which actions are required and why?**

The GB Type Approval proposals are broad and will impact heavily on our membership. Therefore, we recommend a comprehensive stakeholder working group is established to allow industry to state their needs and priorities.

**Q.53 State how the administrative burden of compliance should be reduced for SMEs and why?**

Many SMEs lack the technology and resources required for existing Type Approval regimes. It is therefore crucial that any GB Type Approval process is straightforward and automated where possible.

Simplifying procedures will ensure continued compliance for SMEs who cannot produce automatic CoCs post registration, for example. By making the process accessible, the Government can also support the continued growth of our sector, allowing our members and other independent businesses to compete in both domestic and international markets.

## Supporting Growth and Innovation

### **Q.54 Is there a need to assist manufacturers and converters in increasing their production volumes?**

Yes. There's a growing demand for converted vehicles, however the safety of these conversions is going unchecked due to VCA backlogs as outlined in response to question 38. The introduction of a new postregistration approval scheme for motor caravans could help address the administrative burden of a growing market. Manufacturers would then be able to purchase a specific number of commercial vehicles and then convert them, rather than having to buy a minimum order of pre-registration-based vehicles which can be relatively large and prohibitive for smaller businesses.

### **Q.56 State the emerging automotive technologies that may support GB growth and how these may be implemented?**

Over 98% of leisure vehicles are manufactured in the UK with the majority by NCC members, many of whom are at the forefront of technological innovation in the automotive industry. Our members are continuously pushing the boundaries with cutting-edge advancements in battery technology, water, gas and electrical systems, and cyber-security software. We are keen to showcase our sectors' innovation with Government to support the early adoption of emerging technologies and would welcome the opportunity to meet with the Department to discuss the technical future of our industry further.

### **Q.58 what international approaches can you recommend we adopt to promote innovation?**

Further to our response outlined in question 47, the UK is a centre of innovation. However, our innovation is only as strong as our ability to export our services. The existing proposals will create a bureaucratic process for type approval that threatens our already struggling skills shortage.

To address existing barriers and streamline the GB Type Approval process, we strongly recommend that a Memorandum of Understanding (MoU) is created between the UK and European Union, offering mutual recognition of EUWVTA and GB Type Approval schemes.

This MoU would reduce redundant testing requirements that will be introduced under existing proposals, while also alleviating the VCA administrative burden. For SMEs, this MoU would provide a vital lifeline to a sector that is facing ongoing financial uncertainty considering the cost-of-living crisis. Maintaining safe and open access to the European market safeguards British business and enhances competitiveness

## Supporting Compliance and Enforcement

### **Q.60 Is there a need to improve compliance with safety and environmental regulations?**

There is a growing need for greater awareness between manufacturers, insurers and law enforcement on the appropriate registration and identification of leisure vehicles that have been converted. Any post registration 'motor caravan' should be required to undergo a specific IVA before a V5 can have the body type recorded as motor caravan. Also, the higher speed limit to which a motor caravan can lawfully adhere to should only be available to those vehicles with motor caravans as the body type on the V5 and should not be able to be challenged as present. Vehicles should only be able to be insured as a motor caravan if this is stated on the V5.

### **Q.61 Would compliance with regulations improve if regulators collaborated with industry to develop industry-led policies?**

Yes.

### **Q.63 Why and how can this collaboration be achieved?**

The NCC recommends that a working group is established bringing together Law Enforcement, automotive Trade Associations, insurers and regulators to discuss areas of common interest and improve awareness of potentially unsafe, unregulated vehicles.

The Individual Vehicle Approval (IVA) process should also be developed to ensure any vehicle converted from a commercial van to a motor caravan is safe both on the road and as living accommodation. This extended IVA should include certification for gas and electrical systems, verified by professionals who are Gas Safe and ECA/NIECIC certified respectively. The unregulated market for 'rogue' conversions is estimated to be worth over £1.1 billion as of 2018. This market share is ultimately growing, and in the interests of road and public safety, it is vital that a fully functional process is in place to ensure such vehicles are safe and lawful.

### **Q.66 State any recommendations you have to increase the uptake of vehicle recalls.**

All recalls should be accessible through specific consumer-facing websites and digital platforms and magazines, including those offered by the Camping and Caravan Club and the Caravan and Motorhome Club, with a membership reach in excess of one million leisure vehicle users and owners, to ensure the widest circulation. Greater use should also be made of social media to digitalise the recall notification process, such as WhatsApp announcements and other forms of push notifications to subscribed individuals and businesses.

**Q.70 What other gaps are there in domestic enforcement measures that require addressing?**

As outlined in response to question 53, we recommend that a working group is established bringing together law enforcement, automotive and leisure vehicle sector Trade Associations, insurers and regulators to discuss areas of common interest and improve awareness of potentially unsafe, unregulated vehicles. Key stakeholders include SMMT, NCC, the Independent Garage Association, NPCC, DVSA and Trading Standards. However, it is important to recognise that all stakeholders are at risk of skills shortages.

**Q.71 What international regulatory approaches to compliance and enforcement would you recommend?**

Australia

As with the UK, the process for converting a commercial vehicle into a motor caravan in Australia is heavily regulated and requires compliance with specific standards and inspections to ensure safety and legal conformity.

The Vehicle Standards Bulletin 14 (VSB 14) has been prepared by members of the Australian Motor Vehicle Certification Board Working Party in consultation with industry, user groups, government agencies and individuals with an interest in modifying light vehicles and/or building individually constructed light vehicles (ICVs).

VSB14 is a live document that is under continuous review. It is effectively a national Code of Practice outlining the standards for light vehicle modifications, including camper van conversions. It covers requirements for structural changes, installation of living accommodations, and safety systems such as gas and electrical installations.

In addition to VSB14, each State has additional requirements. For example, in New South Wales (NSW), you need a compliance certificate from a licensed engineer confirming that the conversion meets motor caravan standards, including adequate ventilation, proper installation of electrical systems by a licensed electrician, and compliance with general vehicle safety standards. The vehicle must be inspected and weighed, and modifications must not compromise the vehicle's roadworthiness.

Converted vehicles must also be reclassified and registered as 'motorhomes' or 'RVs'. This process involves thorough inspections to ensure all modifications comply with safety and construction standards, including verifying that at least two-thirds of the vehicle's floor area is no longer suitable for carrying goods, thus ensuring the vehicle's primary function is habitation.

## International Vehicle Standards

### **Q.77 What more could IVS personally do to help you be better informed about the work within UNECE WP.29 framework?**

The NCC represents a substantial sector of the UK tourism economy, encompassing manufacturers, supplier, dealers, and service providers in the leisure vehicle and parks industry. Our expertise and insight can provide a valuable contribution and thought leadership on a range of issues impacting the UK leisure vehicle sector.

We are a leading Trade Association for the leisure vehicle sector in the UK, with multi-faceted interest in vehicle regulations. We would strongly encourage IVS to include the NCC in future discussions on UNECE WP.29 framework.

Given the economic importance and complexities of our sector, it is essential that regular meetings are held with the incoming Government to maintain our pre-eminent status as a leading leisure vehicle nation. These discussions will ensure our members needs are adequately addressed, and that we work together to build a strong and innovative industry post-Brexit.

## Final Comments

### **Q.86 Any other comments?**

Having thoroughly considered the Department for Transport's GB Type Approval proposals, the NCC takes the position that the best outcome for our industry would be full alignment with EUWTA regulations. Common recognition between EU and UK is essential and would greatly reduce the complexity of approving vehicles, eliminating the current duplication of efforts when homologating vehicles for sale in the UK, NI, and Europe.

Additionally, a streamlined and straightforward GB process is essential to support SMEs, ensuring they can adapt without undue burden. We also advocate for a new National type approval for ultra-small series vehicles and an extended IVA for converted motor caravans, incorporating necessary safety certifications. Furthermore, we support regular government consultations to address sector-specific challenges and foster innovation.

Our priorities over the next 5-10 years will be influenced by our Members and Government direction, aiming for harmonised, simplified regulations that benefit our economy. We are proud to represent Members at the forefront of innovation and look forward to working with the next administration on progressing these proposals to the benefit of both Government and our Members.