

Dear Panel Members,

12/8/2014

I submit the following for due consideration. I will reveal/expose **LYING BY OMISSION, IRONY, and MISAPPROPRIATION OF THE FACTS.**

It appears you have been misinformed already as evidenced by the speech given by the Chair in that he said "An example that has been raised with us that illustrates the issue is that local councils provide free access to showgrounds or parklands as temporary accommodation for motorhomes but local commercially-run caravan parks must comply with all the fees, licences, taxes, and insurances of a commercial operation, which makes it very difficult for them to compete."

My submission will centre on competitive neutrality principles and application with the Caravan Cabin Park (CCP) industry/lobby/association and the impact by the fully self-contained RV (campervan, motorhome, and caravan etc.) on drive tourism income on the smaller communities and the need for non-commercial, independent overnight parking.

WHO AM I?

My name is Ian "Mitch" Miller, retired air traffic controller (31yrs), and own a 24ft., 7.315t, Winnebago motorhome on a Mazda T4600 truck chassis. I (we) permanently lived in it for 12 yrs whilst travelling Australia. The rig is fully self-contained (having fresh water tanks, grey water {shwr/sink} and black water {toilet} tanks, solar and generator {silenced}) and do not require any services, even that of a CCP, for approximately 7 days. Then all I require is a "Dump Point" (liquid waste disposal), uptake of fresh water, and general rubbish disposal.

BACKGROUND

As a kid in the 50's and 60's we camped under a funnel cover tarp at Coolum Beach Qld., amongst the trees and sand dunes (about where the CCP is now) and the Camp Ranger collecting the fees. Over time, the plywood caravans started becoming popular and room was made for their "parking". With expanding use this public land was "developed" into a full CCP/Resort. This is typical of hundreds of CCPs throughout Australia – all on Public land. With

Council run or leased out CCPs for profit/income, we see varying “methods” of ensuring patronage. Competition policy (and “fair trading”?) goes out the window when a Council “owns” the CCP and also is the legislating authority to compel its use by passing bylaws of “No Camping in this Shire” (unless in “our” CCP!)---**IRONY!**

Don’t forget the fine for “parking” overnight is up to \$1,100-00 per offence in some shires – more than DUI or dangerous driving! Just for “resting” away from a CCP (in a fully s/c RV, Leaving No Trace – requiring no services).

#### COMPETITIVE NEUTRALITY APPLICATION AND MISUSE

As I understand it, first the “Gov’t” has to have a “significant” business in like competition with private enterprise. The two have to be the same, not different. The local Bundaberg Regional Council owns the 5 (probably only 4 now as the floods ruined 1), and therefore is “competing” with itself, has only one “freecamp” site in its jurisdiction, otherwise decrees No Camping elsewhere. However, if they decide to nominate an overnight “parking” spot (no amenities) for s/c RVs away from the CCPs (free/nominal fee), the lessees cry foul and call it in breach – 2 totally different services but claimed as contrary to the “principles”. It’s like the free BBQs in the park compete with the local takeaways/Maccas etc.. Or the exercise circuit in the park competes with the local gyms. The free boat ramp competes with the local marina. Many more examples but the only “complaint” is from the CCP lobby.

#### TERMS OR DEFINITIONS

The definition/s need to be updated for “parking” “resting” and “camping”. With slogans of Rest, Revive, Survive, it becomes “academic” as to what a s/c RV is doing at times. I can park all day in a designated (painted) parking spot, all closed up, and no one knows whether I am inside or outside. I could be inside sleeping, showering, computing or eating (is that “camping?”), or I could be outside seeing the sights, on a paid tour, eating out, at the movies etc.. Yet at some obscure hour (not published in many cases), sunset, last light, 8pm? I am “deemed” “camping”! The only thing that changed is the sun went down. Am I still inside? Am I outside? I am still subject to fines as I am not in a CCP, paying for a product/service I do not require or want.

With the quantum change in demographics of the RV with efficient solar panels, lithium batteries, LED lighting and holding tanks, the 60's model CCP is becoming redundant for many travellers. Many object the "mandatory" taking of 40% of their daily spend by a CCP when that product is not required, meaning less money to spend on the other 95% of businesses in town. So they bypass the "unfriendly" towns and spend 100% on where "they" choose – win win for all the town. Home Hill and Cooktown are winning as examples. (What other business can you think of, that has bylaws mandating compulsory use, daily, under threat of fine? Why is a CCP sacrosanct?)

I am not advocating willy-nilly parking/resting/camping all over the place, BUT now that the circumstances have changed, Councils/Gov't must address these anomalies by providing what the consumer wants/needs, and CCP owners/operators need to modernise/adjust their business model, or go down the same path as VHS, 35mm film or Commodore 64s!

#### FURTHER IRONY.

The RV manufacturers, in cahoots with the CCP lobby, are making more s/c RVs, then using the profits from sales or subscriptions, actively campaigning against "freedom" camping/resting!

Further, the CCP lobby claim that showgrounds are "non compliant" camping, and unfair competition because they provide a "minimum" service, yet the CCP lobby, when in an overflow circumstance, want the right/s to send the excess there, and charge the same price as if the RV was at the CCP (5star pricing for 1 star service), and have the authority to direct the RV to decamp back to the CCP when the operator wills. So, when the dollars are at stake, "non compliance" camping goes out the window!

#### LYING BY OMISSION

The CCP lobby are claiming tough times along with other businesses. Further, the CCPs will go broke if a "freecamp"/lowcost camp is established for the s.c RV in "competition" nearby.

What they are not revealing, is the progress and profitability of CCPs, being the best in the accommodation mantra – and that's in the report by their OWN Association.

The example given by the Chair as posted, could be a result of many factors. It appears the information to hand is trying to denigrate motorhomers as being stingy and the Show Society as shirking their responsibilities. It could well be that the motorhome is fully self-contained and only needs a “parking” space with no facilities, compared with the bells and whistles and jumping pillows etc., of a CCP. Further, many Councils are recognising that many s,c RVs are bypassing their area because of no freecamp/lowcost area and so are now realising the passing traffic is dollars lost to the community as a whole. The CCP is NOT losing money, as the RVer was NOT going to stay there in the first place!

#### MISAPPROPRIATION OF THE FACTS

Following on from the last paragraph, the CCPs continually, and continuously, claim they’ll “go broke” if a freecamp/lowcost area is allocated in town. Along with the evidence I presented above re profitability, no CCP has proven the disastrous doom and gloom espoused by opening their books or recognising the many reports and newspaper articles denoting otherwise. (See <http://www.freechoicecamps.com.au/> for a comprehensive collection of published newspaper articles, reports and statistics – too numerous to post here).

There is plenty of evidence to counter the CCP lobby claim of the “importance” of the CCP, in what/how they “support” the community, along with realisation “But Rockhampton Region Mayor Margaret Strelow said caravan parks were not the only businesses council needed to consider in allowing overnight parking.” (<http://www.themorningbulletin.com.au/news/free-parking-rvs-kershaw-gardens-rob-van-parks/2344939/#more-replies>)

I think you may have my ideas by now and thank you for your indulgence in reading this far. If you wish further information, please do not hesitate to contact me.

Regards

Mitch

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