



HopgoodGanim

LAWYERS

1 November 2019

Mr David Hatfield
Australian Competition and Consumer Commission
By email: David.Hatfield@acc.gov.au

Our ref: 1956077 - Brett Bolton

BRISBANE

Level 8, Waterfront Place
1 Eagle Street
Brisbane Qld 4000 Australia

PO Box 7822, Waterfront Place
Brisbane Qld 4001 Australia

ABN: 54 105 489 661

[Redacted]

Dear Mr Hatfield

Exclusive dealing notification N10000505 - Caravan Trade & Industries Association Queensland

We refer to your letter of 18 October 2019.

Please find **attached** our client's response.

Our client has taken all reasonable steps to provide you with the relevant information. If you need further clarification or information, please contact the writer.

Our client does not seek to exclude any of the information from the public register.

Yours faithfully

[Redacted signature]

HopgoodGanim Lawyers

Contact: **Brett Bolton**
Partner

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1. Provide details of the trade shows and events run by CTIAQ to which the notified conduct is proposed to apply. Provide the following data covering the previous 3 calendar years (for each location):

a. the frequency of trade shows

CTIAQ conducts four trade shows/events annually:

- **The Let's Go Gold Coast Caravan & Outdoor Expo**
Metricon Stadium, Cararra, Gold Coast
 - **2019** - 1 to 3 March
 - **2018** - Not held due to conduct of Commonwealth Games
 - **2017** - 3 to 5 March
- **The Let's Go Queensland Caravan & Camping Supershow**
Brisbane Showgrounds, Brisbane
 - **2019** – 5 to 10 June
 - **2018** – 6 to 11 June
 - **2017** – 7 to 12 June
- **The Let's Go Sunshine Coast Caravan & Outdoor Expo (inaugural show)**
Nambour Showgrounds, Nambour, Sunshine Coast
 - **2019** – 30 August to 1 September
- **The Let's Go Brisbane Caravan & Outdoor Sale**
Brisbane Showgrounds, Brisbane
 - **2018** – 25 to 28 October
 - **2017** – 26 to 29 October
 - **2016** – 27 to 30 October

b. the number of attendees

- **Let's Go Gold Coast Caravan & Outdoor Expo**

Year	Exhibitor Attendance	Public Attendance
2019	125	15,064
2018	N/A	N/A
2017	100	12,217

- **Let's Go Queensland Caravan & Camping Supershow**

Year	Exhibitor Attendance	Public Attendance
2019	246	40,529
2018	251	49,147
2017	254	40,298

- **Let's Go Sunshine Coast Caravan & Outdoor Expo**

Year	Exhibitor Attendance	Public Attendance
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2019	94	11,127
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- **Let's Go Brisbane Caravan & Outdoor Sale**

Year	Exhibitor Attendance	Public Attendance
2018	99	14,719
2017	92	16,132
2016	99	14,966

- c. the approximate turnover of each event from sales of caravans and motorhomes, and other product categories and

Refer to 8(c).

- d. the prices for exhibitors and prices for entry.

- **Let's Go Gold Coast Caravan & Outdoor Expo**

2019

Public Admission: Adult \$12 Concession \$10

Exhibitor space costs:

Outdoor Space – Member Rate	Floor space only GST inclusive
Up to 30 sqm	\$42.00 per sqm
31 to 100 sqm	\$26.00 per sqm
101 to 400 sqm	\$20.00 per sqm
401 to 800 sqm	\$16.00 per sqm
801 sqm & over	\$14.00 per sqm
Covered Space – member only base outdoor space rate +	+ \$5.00 per sqm
Shell Scheme - Member Rate	+ \$53.00 per sqm
Non Members – an additional 25% is applied to each of the above rates.	

2018

Not held due to the Commonwealth games.

2017

Public Admission: Adult \$10 Concession \$8

Exhibitor space costs:

Outdoor Space – Member Rate	Floor space only GST inclusive
Up to 30 sqm	\$42.00 per sqm
31 to 100 sqm	\$28.00 per sqm
101 to 400 sqm	\$19.00 per sqm
401 to 800 sqm	\$14.00 per sqm

801 sqm & over	\$12.00 per sqm
Covered Space – member only base outdoor space rate +	+ \$5.00 per sqm
Shell Scheme - Member Rate	+ \$53.00 per sqm
Non Members – an additional 25% is applied to each of the above rates.	

- **Let's Go Queensland Caravan & Camping Supershow**

2019

Public Admission: Adult \$16

Concession \$12

Exhibitor space costs:

	Membership Category	Applicable Space Rate
(1)	Non Member	Base Rate
(2)	Probationary Member	Base Rate less 5%*
(3)	Member - Associate	Base Rate less 15%*
(4)	Full Member	Base Rate less 20%*
(5)	National Contributor Member – Associate	Base Rate less 25%*
(6)	National Contributor Full Member	Base Rate less 30%*
Rate Table		* Non Member Base Rate Floor space only and GST inclusive
Indoor Space - All Buildings excluding Royal ICC		
	Up to 30 sqm	\$209.00
	31 to 200 sqm	\$138.00
	201 to 400 sqm	\$121.00
	401 to 800 sqm	\$94.00
	801 sqm & over	\$83.00
Royal ICC Building – (Non Member Base Rate + 25%)		
	Up to 30 sqm	\$229.90
	31 to 200 sqm	\$151.80
	201 to 400 sqm	\$133.10
	401 to 800 sqm	\$103.40
	801 sqm & over	\$91.30
Building 1 – Tourism Stands - Space Rate includes Shell Scheme + daily stand cleaning		
	All sizes	\$305.50
Shell Scheme Cost -		
	* (1) Non Member	+\$72.00 per sqm
	* (2, 3 & 4) Probationary, Associate & Full Member	+\$60.00 per sqm
	* (5 & 6) National Contributor (Associate & Full)	+\$55.00 per sqm
Outdoor Space - (excluding Ekka Plaza)		
	Up to 30 sqm	\$92.00
	31 to 200 sqm	\$83.00
	201 to 400 sqm	\$74.00
	401 to 800 sqm	\$65.00
	801 sqm & over	\$52.00

Ekka Plaza - Outdoor – (Non Member Base Rate plus 25%)

2018

Public Admission: Adult \$10

Concession \$7.50

Exhibitor space costs

	Membership Category	Applicable Space Rate
(1)	Non Member	Base Rate + 10%
(2)	Probationary Member	Base Rate
(3)	Member - Associate	Base Rate less 15%*
(4)	Full Member	Base Rate less 20%*
(5)	National Contributor Member – Associate	Base Rate less 25%*
(6)	National Contributor Full Member	Base Rate less 30%*
Rate Table		* Non Member Base Rate Floor space only and GST inclusive
Indoor Space - All Buildings excluding Royal ICC		
	Up to 30 sqm	\$209.00
	31 to 200 sqm	\$138.00
	201 to 400 sqm	\$121.00
	401 to 800 sqm	\$94.00
	801 sqm & over	\$83.00
Royal ICC Building – (Probationary Member Base Rate + 25%)		
	Up to 30 sqm	\$229.90
	31 to 200 sqm	\$151.80
	201 to 400 sqm	\$133.10
	401 to 800 sqm	\$103.40
	801 sqm & over	\$91.30
Building 1 – Tourism Stands - Space Rate includes Shell Scheme + daily stand cleaning		
	All sizes	\$305.50
Shell Scheme Cost -		
	* (1) Non Member	+\$72.00 per sqm
	* (2, 3 & 4) Probationary, Members & Associate	+\$60.00 per sqm
	* (5 & 6) National Contributor (Associate & Full)	+\$55.00 per sqm
Building 13 – Awning Cover		
	Up to 30 sqm	\$114.00
	31 to 200 sqm	\$102.60
	201 to 400 sqm	\$94.30
	401 sqm and over	\$84.90
Outdoor Space - (excluding Ekka Plaza)		
	Up to 30 sqm	\$92.00
	31 to 200 sqm	\$83.00
	201 to 400 sqm	\$74.00
	401 to 800 sqm	\$65.00
	801 sqm & over	\$52.00
Ekka Plaza - Outdoor – (Non Member Base Rate plus 25%)		

2017

Public Admission: Adult \$20

Concession \$15

Exhibitor space costs:

	Membership Category	Applicable Space Rate
(1)	Non Member	Base Rate + 10%
(2)	Probationary Member	Base Rate
(3)	Member - Associate	Base Rate less 15%*
(4)	Member	Base Rate less 20%*
(5)	National Contributor Member - Associate	Base Rate less 25%*
(6)	National Contributor Member	Base Rate less 30%*
Rate Table		* Non Member Base Rate Floor space only and GST inclusive
Indoor Space - All Buildings excluding Royal ICC		
Up to 30 sqm		\$209.00
31 to 200 sqm		\$138.00
201 to 400 sqm		\$121.00
401 to 800 sqm		\$94.00
801 sqm & over		\$83.00
Royal ICC Building – (Probationary Member Base Rate + 25%)		
Up to 30 sqm		\$229.90
31 to 200 sqm		\$151.80
201 to 400 sqm		\$133.10
401 to 800 sqm		\$103.40
801 sqm & over		\$91.30
Building 1 – Tourism Stands - Space Rate includes Shell Scheme + daily stand cleaning		
All sizes		\$305.50
Shell Scheme Cost -		
* (1) Non Member		+\$72.00 per sqm
* (2, 3 & 4) Probationary, Members & Associate		+\$60.00 per sqm
* (5 & 6) National Contributor (Associate & Full)		+\$55.00 per sqm
Building 13 – Awning Cover		
Up to 30 sqm		\$114.00
31 to 200 sqm		\$102.60
201 to 400 sqm		\$94.30
401 sqm and over		\$84.90
Outdoor Space - (excluding Ekka Plaza)		
Up to 30 sqm		\$92.00
31 to 200 sqm		\$83.00
201 to 400 sqm		\$74.00
401 to 800 sqm		\$65.00
801 sqm & over		\$52.00
Ekka Plaza - Outdoor – (Non Member Base Rate plus 25%)		

- **Let's Go Sunshine Coast Caravan & Outdoor Expo**

2019

Public Admission: Adult \$12 Concession \$10

Exhibitor space costs:

Outdoor Space – Member Rate	Rates are for floor space only. GST inclusive
Up to 30 sqm	\$42.00 per sqm
31 to 200 sqm	\$26.00 per sqm
201 to 400 sqm	\$20.00 per sqm
401 to 800 sqm	\$16.00 per sqm
801 sqm & over	\$14.00 per sqm
Covered Space – member only base outdoor space rate +	+ \$10.00 per sqm
Shell Scheme - Member Rate - Only available in covered sites	+ \$53.00 per sqm
Non Members – an additional 25% is applied to each of the above rates.	

- **Let's Go Brisbane Caravan & Outdoor Sale (Member only event)**

2018, 2017 & 2016

Public Admission: Adult \$10 Concession \$8

Exhibitor space costs:

Outdoor Space	Rates are for floor space only. GST inclusive
Up to 30 sqm	\$40.00 per sqm
31 to 200 sqm	\$24.00 per sqm
201 to 400 sqm	\$20.00 per sqm
401 to 800 sqm	\$16.00 per sqm
801 sqm & over	\$14.00 per sqm
Covered Space - Base outdoor space rate +	
All Members - Existing Marquees, The Pavilion and any other covered Space	+ \$10.00 per sqm
Shell Scheme - All Members - Only available in covered sites	+ \$53.00 per sqm

2. Provide details of other caravanning and motor home trade shows run in Queensland by competitors of CTIAQ over the last three calendar years including (to the extent CTIAQ is aware):

a. the location and frequency of these shows

**Moreton Bay Caravan, Camping, Boating & 4x4 Expo
Redcliffe/Brisbane, February 2017, 2018 & 2019**

**National 4x4 Outdoors Show & Fishing & Boating Expo
Brisbane, March/April 2017, 2018 & 2019**

**South Queensland Caravan, Camping, Fishing & 4x4 Expo
Nambour/Sunshine Coast, April 2017, 2018, 2019**

**Cairns Home Show & Caravan, Camping & Boating Expo
May 2017, 2018 & 2019**

**Mackay Home Show & Caravan, Camping Expo
May 2017, 2018 & 2019**

**Farm Fantastic Expo
Caboolture, July 2017, 2018 & 2019**

**Gold Coast Midyear Caravan & Camping Expo plus Home & Outdoor Living Ideas
Gold Coast, July 2017, 2018 & 2019**

**The Queensland Outdoor Adventure and Motoring Expo
Toowoomba, July/August 2017, 2018 & 2019**

**Wide Bay & Fraser Coast Home Show & Caravan, Camping, 4x4 & Fishing Expo
Maryborough, August 2017, 2018 & 2019**

**Rockhampton Home Show & Caravan, Camping, 4x4 & Fishing Expo
August 2017, 2018 & 2019**

**Townsville Caravan, 4x4 & Outdoor Adventure Expo
August 2017, 2018 & 2019**

**Cleveland Caravan, Camping, Boating & 4x4 Expo
Cleveland/Brisbane, September 2017, 2018 & 2019**

**Outdoor X
Sanctuary Cove/Gold Coast, September 2019**

**Sunshine Coast Home Show & Caravan, Camping & Boating Expo
September/October 2017, 2018 & 2019**

b. the number of attendees and

We do not have this information.

c. the prices for exhibitors and prices for entry.

We do not have this information

3. Clarify whether the exclusivity requirement is limited to events in South East Queensland only or if members must not participate in non-CTIAQ events elsewhere in Queensland or Australia in order to be eligible for the discount.

The exclusivity requirement is only limited to South East Queensland, extending to the Fraser Coast. The reason being, CTIAQ provides Industry Owned & Operated Events in this region, but not beyond. Events beyond Fraser Coast are not considered to be South East Queensland.

4. Indicate the extent of the discount CTIAQ proposes to offer to members who participate in the offer, how it is to be calculated and the conditions under which it is proposed to be granted.

Stage 1 – 2020

If members participate in CTIAQ Owned & Operated Events exclusively, they will be rewarded with:

- **50% discount off the total cost of their site fees at the Let’s Go Brisbane Caravan & Outdoor Sale, 29 October 2020 to 1 November 2020.**
- **50% discount off registration fees to the Caravan Industry Association of Australia’s annual conference for up two people from a member business.**

5. Does CTIAQ currently set different prices to exhibit at its events for members versus non-members?

Refer to 1 d. above and also below:

We have a tiered rate structure based on a participant’s status as a non-member or member, and the size of the site required. All CTIAQ events are open to CTIAQ Members & Non-Member companies, however priority for space allocations is always granted to CTIAQ Members. When allocating space, the following criteria is considered:

- 1. Whether the participant is a CTIAQ Member or Non-member;**
- 2. Length of CTIAQ Membership;**
- 3. Continuity of participation in CTIAQ Events i.e.: Does the company applying for space participate in all CTIAQ owned & operated events as follows:**
 - a) The Let’s Go Queensland Caravan and Camping Supershow**
 - b) The Let’s Go Brisbane Caravan & Outdoor Sale**
 - c) The Let’s Go Gold Coast Caravan & Outdoor Expo**
 - d) The Let’s Go Sunshine Coast Caravan & Outdoor Expo**

6. Provide the number of members of CTIAQ and an estimate of the proportion of the Queensland caravanning industry that are currently members of CTIAQ.

Member Category	Number
Full Member	131
Associate	58

Branch	42
Probationary	16

It is difficult to determine the size of the industry of and the number of businesses connected to the recreational vehicle industry in Queensland. As, for example, a motor vehicle service and repair business in a regional town like Winton, could also provide repair and service work for recreational vehicles that pass through the town. As a consequence, they would not be a member of ours, however they are still technically connected to the caravan industry.

The Caravan Industry Association of Australia engaged NEM Australasia to conduct a research project in 2018 on the economic value and size of the Australian Caravan & Camping Industry. Findings for Queensland are below:

Business Type	Number in Queensland
Component Manufacturer	8
Caravan / Motorhome Manufacturer	28
Camper Trailer Manufacturer	58
Caravan / Motorhome Dealer	151
Camper Trailer Dealer	150
RV Parts & Accessories	188
Camping Equipment Retailers	208
Service & Repair	121
RV Hire	70
RV Storage	95

7. Can you please explain how the exclusivity requirement under the Proposed Conduct is likely to result in each of the public benefits listed at 5(a) of the notification. Included in your response, please provide the total revenue from CTIAQ’s trade events for the last three calendar years, and the amount from this revenue that was allocated to fund CTIAQ’s safety check program for the same period.

Total revenue:

2016 to 2019 SHOW ANALYSIS					
Show or Expo	Calendar Year	Income	Expenses	Calendar Year Shows Profit/-Loss	Safety Day Program Costs
gold coast	2016	450,940	412,322	38,618	
supershow	2016	3,127,234	1,351,703	1,775,531	
sale	2016	570,468	569,094	1,374	
	2016			\$1,815,523	\$57,760
gold coast	2017	478,268	417,772	60,496	
supershow	2017	2,990,417	1,333,129	1,657,288	
sale	2017	620,022	677,740	-57,718	
	2017			\$1,660,066	\$91,735
gold coast	2018 no expo	0	0	0	
supershow	2018	2,918,371	1,568,971	1,349,400	
sale	2018	687,102	678,362	8,740	
	2018			\$1,358,140	\$80,158
gold coast	2019	618,106	530,746	87,360	
supershow	2019	2,933,163	1,392,616	1,540,547	
sunshine coast	2019	409,857	391,378	18,479	
sale TBA	2019	0	0	0	
	2019			\$1,646,386	\$77,345

- (a) Businesses that participate in CTIAQ events are subject to compliance audits conducted by the Caravan Industry Association of Australia. Product identified as non-compliant cannot be exhibited at future CTIAQ events or advertised for sale to the general public at CTIAQ events, unless and until the non-compliance is rectified.

Recreational Vehicle Products showcased at CTIAQ Events are subjected to compliance audits. These compliance reviews are conducted by technical staff from the Caravan Industry Association of Australia and focus of relevant Australian Design Rules (ADR). If issues are identified, exhibitors are notified and instructed to rectify the problem prior to supplying the product to the consumer.

This process educates the dealer / manufacturer in areas of compliance relating to the Australian Design Rules (ADR’s). Consumers benefit by purchasing products from dealers / manufacturers who are committed to consistently supplying product that adheres to ADR’s and Federal Compliance Regulations.

- (b) Revenue generated from CTIAQ events is used substantially to fund CTIAQ’s free caravan safety check program and other educational programs for consumers and industry staff. The program is available, free of charge, to owners of caravans, motorhomes and other recreational vehicles to ensure compliance with the Australian Design Rules and Road Safety Guidelines.

The free program is an initiative of CTIAQ and organised in conjunction with the Department of Transport and Main Roads.

The event has been designed to increase driver understanding of the challenges they may face whilst travelling on the roads, and to ensure they are better equipped to avoid accidents. The program also features towing equipment and other safety accessory displays, which attendees can inspect and discuss with experts on the day.

The program is a safe zone for all who attend – no fines or breaches are issued. It is purely an educational activity with the ultimate aim of ensuring that you are travelling safe and compliant.

The program launched in 2014 and to date nearly 3000 recreational vehicles have been inspected across the state.

- (c) CTIAQ members may choose to exhibit at fewer events and will, therefore, be able to invest more time and resources into their exhibits, improving the experience for the consumer.

It is quite a costly exercising exhibiting recreational vehicles at events. Costs incurred include site fees, staffing, setup & display and operational / logistic costs. The more shows attended, the higher the cost outlay. Members are forced to cut back in areas such as theming, display and customer comfort which ultimately impacts negatively upon the customer experience.

Businesses that participate in fewer events are able to invest more into events they actually attend which provides a better experience for the consumer.

- (d) Members will also be able to spend more time improving the experience at their dealerships, creating greater consumer trust and confidence.

If members attend fewer shows, they will have more time, resources and funding to direct towards improving the customer experience at the dealership or business premises.

Members invest a large amount of money into their dealerships in order to create a professional, comfortable and educational experience for consumers. This also generates greater levels of trust and confidence for consumers.

- (e) CTIAQ can use the revenue created from their events to create and improve industry accreditation and educational programs for CTIAQ members.

8. Provide, in relation to the caravanning industry more generally:

- a) any information regarding how far exhibition attendees travel in order to attend exhibitions

- ***Let’s Go Queensland Caravan & Camping Supershow***

2019

<i>Postcode Range</i>	<i>State</i>	<i>Attendance</i>
<i>2000 – 2930</i>	<i>New South Wales</i>	<i>1994</i>
<i>3000 - 3996</i>	<i>Victoria</i>	<i>263</i>
<i>4000 - 4895</i>	<i>Queensland</i>	<i>33679</i>

9010 – 9726	Queensland	3
5000 - 5680	South Australia	127
6001 – 6725	Western Australia	91
7000 – 7954	Tasmania	151
	New Zealand	15
	Japan	1
	Philippines	2
	Undisclosed	4203

2018

Postcode Range	State	Attendance
0800 – 0874	Northern Territory	52
2000 – 2914	New South Wales	2335
3000 - 3984	Victoria	347
4000 - 4941	Queensland	42202
9726	Queensland	5
5000 - 5814	South Australia	133
6019 – 6718	Western Australia	107
7008 – 7803	Tasmania	113
	New Zealand	26
	South Africa	5
	Undisclosed	3822

- **Let's Go Sunshine Coast Caravan & Outdoor Expo**

2019

Postcode Range	State	Attendance
2016 – 2988	New South Wales	284
3029 - 3978	Victoria	324
4000 - 4999	Queensland	9486
5007 - 5666	South Australia	62
6019 – 6743	Western Australia	23
7004 – 7700	Tasmania	103
	New Zealand	4
	Undisclosed	841

- **Let's Go Brisbane Caravan & Outdoor Sale**

2018

Postcode Range	State	Attendance
0800 - 0870	Northern Territory	13
2011 – 2905	New South Wales	406
3000 - 3992	Victoria	56
4000 - 4964	Queensland	9153
5000 - 5833	South Australia	26
6018 – 6980	Western Australia	17
7000 – 7898	Tasmania	32
	Undisclosed	729

b) an overview of the caravan and motorhome supply chain

Supplier/Manufacturer (Appliances, Chassis, Componentry etc)

to

Recreational Vehicle Manufacturer / Importer

to

Recreational Vehicle Dealer

to

Consumer

c) total caravan and motor home sales in Queensland and nationally and the number of caravan and motor home sales made at events.

We do not have data on the total number of recreational vehicles sold in Queensland annually. We do have registration statistics, set out below:

Queensland Total Registrations

- **Caravans: 168,957 Registrations**
- **Motorhomes: 17,446 Registrations**
- **Total: 186,403**

National Total Registrations

- **Caravans: 641,603 Registrations**
- **Motorhomes: 69,751 Registrations**
- **Total: 711,354**

Queensland New Vehicle Registrations (manufactured in 2018) - this can broadly be suggestive of new sales.

- **Caravans: 9,543**
- **Campervans: 876**
- **Total: 10,419**

National New Vehicle Registrations (manufactured in 2018) - this can broadly be suggestive of new sales.

- **Caravans: 33,707**
- **Campervans: 2,690**
- **Total: 36,397**

This registration data is from Australian Bureau of statistics at Y/E January 2019.

d) the total value of caravan and motor sales in Queensland and nationally and the value of caravan and motor home sales made at events

Regarding value of sales, IbisWorld indicates the trailer and caravan dealer revenue is estimated to be worth \$2.3 billion annually. Queensland accounts for 26% of all registrations and 29% of all new recreational vehicle sales. It could be estimated that the value of dealerships/sales is approximately \$644 million.

Approximately 30% of a Caravan Dealers annual sales revenue are generated through events.

e) information related to what is involved in running caravan and motorhome trade exhibitions, including costs (ref table above for costs).

Expected Costs for Shows & Expos
Advertising & Public Relations
Bank Charges
Bus/Train Transport
CIAA Space Levy
Electrical
Exhibitor/Guest Functions
First Aid
Hire
Equipment/Lights/Audio
Internet/Software Expenses
Miscellaneous Expenses
PA Hire
Parking
Petty Cash/Committee Room
Postage
Printing & Stationery
Prizes
RNA Additional Charges
RNA Space Cost
Security
Seminars
Shell/Carpet/Marquee Hire
Signage
Special Attract/Entertainment
Special Attractions/Projects
Staff Uniforms
Sundry Equipment
Telephone & Fax
Traffic Control
Transport & Couriers
Travel Expenses

Workplace Health & Safety
Superannuation
Wages CasualShow staff only