



# Camping Association of Victoria Inc.

28<sup>th</sup> April, 2004

FILE No:

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MARS/PRISM:

Tim Grimwade  
General Manager  
Adjudication Branch  
Australian Competition and Consumer Commission  
PO Box 1199  
DICKSON ACT 2602

Dear Mr Grimwade,

**Submission regarding Applications for Authorisation lodged by the  
Department of Industry, Tourism and Resources relating to the  
preferential/exclusive treatment of accredited tourism businesses  
(A90912 and A90913)**

Thank you for extending an invitation to both the Australian Camping Association (ACA) and the Camping Association of Victoria (CAV) to supply the ACCC with a submission responding to the above applications.

This submission is presented to you as a combined response from both the ACA and the CAV.

Following an examination of the Applications, the ACA and CAV would like to share with the ACCC the following observations:

- The Applications do not disclose the inequalities that exist between the ATAA endorsed accreditation programs. Specifically, the 'generic' programs that operate in Western Australia, South Australia, Victoria, Tasmania, ACT and NT are eligible to receive funding from their STOs to cover implementation and administration costs of running the accreditation programs in these states and territories. In some cases, this funding is vital to the 'viability' of the generic program. That is, without this state government funding, the program would not be available.
- Most accreditation programs that have ATAA endorsement are government subsidized.

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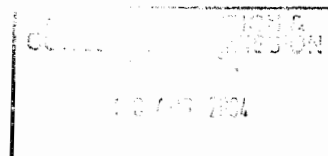
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A14519T



The CAV is the peak industry body for group accommodation and outdoor program providers

- There exists a lack of consistency within these ATAA endorsed programs in the area of verification. This has a direct bearing on the cost tourism businesses are required to pay for their accreditation. Accordingly, this creates competition between government funded 'generic' programs and industry funded 'sector specific' programs.
- The sector specific *Camping With Confidence* accreditation program has been established for 17 years. The program is ATAA endorsed. Inconsistencies between ATAA endorsed programs also extend to the marketing and branding of programs in the market place. The ACA and CAV are required to cover additional costs relating to marketing and branding in order to communicate the very real differences between a 'generic' program and the 'sector specific' program developed, owned and operated by our profession.
- ATAA endorsement requires accreditation program managers to pay a license fee of \$20 per annum per accredited organisation (business). The lack of resources contained within ATAA resulted in program managers having to fund additional legal fees and resources to seek amendments to the license agreement. Generic program managers were able to access government funding to cover these costs, sector specific program managers could not. Additionally, ATAA sought to implement these license fees retrospectively and on an annual basis (many programs operate on a three year cycle).
- The Applications place an emphasis on the marketing advantages that are available to accredited tourism businesses. Research undertaken within the sector has highlighted that the marketing advantages are not a driver to businesses renewing their accreditation. Rather, tourism businesses place greater value in the acquisition of ongoing business development skills. The 'sector specific' programs are better able to provide this and hence tailor their programs accordingly.

The ACA and the CAV present the above information to the ACCC and hope it will assist the ACCC in its decision making process regarding the Applications.

Please do not hesitate to contact me should you require further information.

Yours sincerely,



Joanne Prior  
**Chief Executive Officer**