

3. Campers

1. Definition of Category

There are two main types of campers: (1) self-propelled campers (also known as recreational vehicles or RVs) and (2) trailer-type campers that are towed behind another vehicle (used either as a residence or for camping).

HS Numbers	Commodity
8703	Self-propelled campers ^(Note)
8716.10	Trailers and semi-trailers for housing or camping

Note: Campers are not defined as an independent category with a separate HS Number. Instead, they are classified the HS Number listed. In statistics and graphs below, only "8716.10-000: trailers and semi-trailers for housing or camping" is treated.

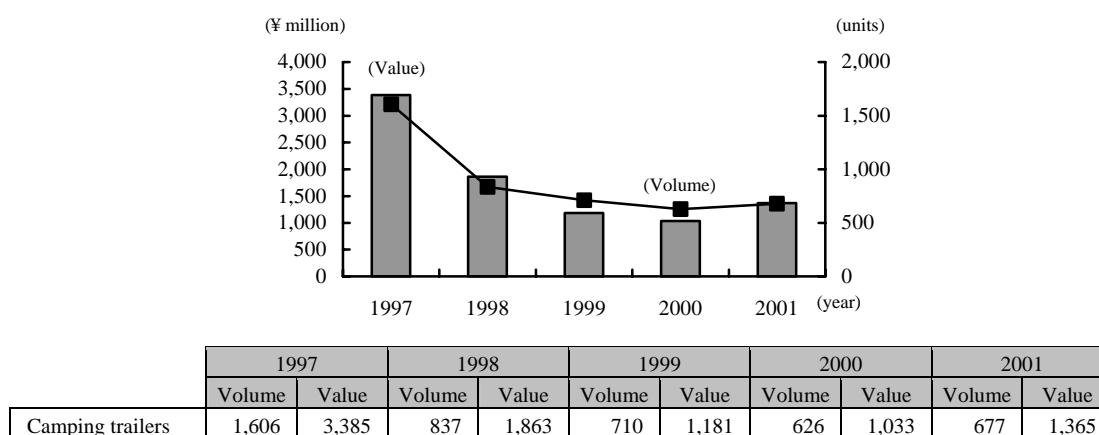
2. Import Trends

(1) Recent Trends in Camper Imports

Imports first started about 1980 but initially amounted to no more than a few vehicles per year. It was not until 1988 that imports began to pick up significantly. That was when the general trading companies began handling imported campers, and after that imports started increasing year by year. Imports rose particularly sharply from 1994 to 1995 due in part to the high purchasing power of the yen. In 1995, the number of self-propelled campers imported rose 4-fold from 1991. As more and more people in Japan work a five-day work week and take extended vacations, leisure activities have become increasingly popular. As a result, auto camping is becoming more popular with more people discovering the pleasure of enjoying companionship with one's family members while taking pleasure from outdoor activities. The result was a rapid increase in imports from Europe and the United States, the home of outdoor leisure pursuits.

The increase in the consumption tax in 1998 caused camper sales for that year to drop by nearly half from the year before, to 837 units. This was followed in 2000 by yet another major slump, and sales dropped to just 626 units. But by 2001 the slump appeared to be over, and imports rose by 8.7% to 677 units. On a value basis, imports jumped by 32.1% to ¥1.37 billion.

Fig. 1 Japan's camper imports



Units: units, ¥ million

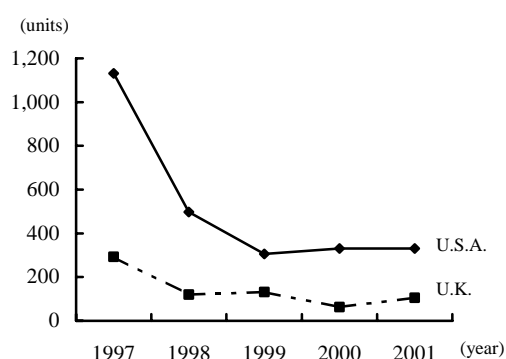
Source: Japan Exports and Imports

(2) Imports by Place of Origin

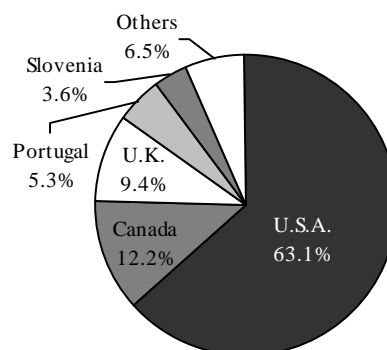
The United States enjoys a lead in exports of campers to Japan. However, the United States once had more than a 90% share, and that is no longer the case. Now camper imports are coming from a variety of countries, including the United Kingdom, Portugal, Slovenia, Canada, among others. Import gains in 2001 were mainly due to recovery in sales of imports from the United Kingdom and Canada.

Fig. 2 Principal exporters of camping trailers to Japan

Trends in import volume by leading exporters



Shares of camping trailer imports in 2001 (value basis)



	1997	1998	1999	2000		2001			
	Volume	Volume	Volume	Volume	Value	Volume	Value		
U.S.A.	1,131	498	306	331	705	331	48.9%	861	63.1%
U.K.	293	120	131	63	79	106	15.7%	129	9.4%
Portugal	1	63	116	80	63	76	11.2%	72	5.3%
Slovenia	-	-	42	62	46	56	8.3%	48	3.6%
Canada	52	26	28	8	20	28	4.1%	166	12.2%
Others	129	130	87	82	120	80	11.8%	88	6.5%
TOTAL	1,606	837	710	626	1,033	677	100.0%	1,365	100.0%
(E U)	411	307	323	224	260	255	37.7%	286	21.0%

Units: units, ¥ million

Source: Japan Exports and Imports

(3) Imports' Market Share in Japan

Because there are no accurate customs statistics on imports of self-propelled campers, there is no way to know for sure how large a market share imports command. However, there is no denying that imports from the United States and Europe have contributed mightily to the growth of the market.

3. Key Considerations related to Importing

(1) Regulations and Procedural Requirements at the Time of Importation

The importation of vehicles that are equipped as camping cars is subject to the High-Pressure Gas Safety Law. There are no regulations that apply to imports of camping cars. However, importers must notify car numbers and other items stipulated by the Road Vehicles Act with the Minister of Land, Infrastructure and Transport within 20 days of importing each camping car. In addition, all camping cars must comply with safety standards under the Road Vehicles Act before they can be sold or driven on the roads of Japan.

1) High-Pressure Gas Safety Law

The Law sets standards for gas containers and the composition of the gas. The Law also requires inspection of camping cars equipped with gas containers at the time of import. For details, contact the Safety Division, Agency for Nuclear and Industrial Safety, Agency of Natural Resources and Energy, Ministry of Economy, Trade and Industry. Note that when gas containers are imported with the gas inside, caution is required in that this is deemed to constitute indirect sale and a license for sale of LP gas is required.

(2) Regulations and Procedural Requirements at the Time of Sale

The sale of camping cars is subject to provisions of the Road Vehicles Act, the Energy Conservation Law, and the Act Against Unjustifiable Premiums and Misleading Representations. In addition, when selling the vehicles that are equipped as camping cars is sometimes subject to the Electrical Appliance and Material Safety Law.

1) Road Vehicles Act

The Road Vehicles Act sets structural and equipment standards for automobiles in order to assure the safety of automobiles and to prevent environmental pollution. Therefore, prospective importers of camping cars must decide whether to import then that already comply with these safety standards, or instead to make any needed modifications after reaching Japan.

In principle the government is required to test each car for compliance at a test facility. However, in order to simplify and streamline the process, the government actually performs test on sample cars from each model line. The certification system offers three different sets of procedures (type designation system, new car notification system, and special handling procedures for small-quantity automobiles), the choice of which is up to the applicant. For details about the certification systems, refer to the section “III-1 Passenger Cars” in this guidebook, or contact the Evaluation and Registration Division, Engineering and Safety Department, Road Transport Bureau, Ministry of Land, Infrastructure and Transport.

In general, however, even camping cars are often imported as station wagons, etc. and then remodeled, therefore the certification system does not apply and each vehicle is checked to see if it meets the safety standards. Under the Road Vehicles Act, registration as a camping car requires that the following structural requirements be satisfied:

1. Requirements on sleeping apparatuses in cabin
2. Requirements on water supply facilities and cooking apparatuses in cabin
3. Use of at least half of the area of the cabin other than the driver seat for sleeping apparatuses, water supply facilities, and cooking apparatuses, and the area for use of the same

• Japan Vehicle Inspection Association (VIA) TEL: 0424-71-7623 <http://www1.ocn.ne.jp/~viasakai>

2) Energy Conservation Law

Under provisions of the Energy Conservation Law, camping cars are required to make improvement in the performance concerning energy saving and subject to labeling requirement about energy consumption efficiency, etc. (see 4. Labeling)

3) Electrical Appliance and Material Safety Law

Camping cars equipped with refrigerators and other household electrical appliances are subject to the regulations of the Electrical Appliance and Material Safety Law at the time of sale, when they are not built-in types.

4) Act Against Unjustifiable Premiums and Misleading Representations

<Fair Competition Code Concerning Representation of Automobile Industry>

The industry has voluntarily adopted labeling guideline in order to assure consumer product choice availability and preserve fair competition, based on the Act Against Unjustifiable Premiums and Misleading Representations. (see 4. Labeling)

(3) Competent Agencies

- Road Vehicles Act
Evaluation and Registration Division, Engineering and Safety Department, Road Transport Bureau, Ministry of Land, Infrastructure and Transport-----Manufacturer Agreement (Imports)
Engineering Planning Division, Engineering and Safety Department, Road Transport Bureau, Ministry of Land, Infrastructure and Transport----- Automobile safety standards
Operation Safety and Environment Division, Engineering and Safety Department, Road Transport Bureau, Ministry of Land, Infrastructure and Transport-----Exhaust emission
TEL: 03-5253-8111 <http://www.mlit.go.jp>
- High Pressure Gas Safety Law
Safety Division, Agency for Nuclear and Industrial Safety, Agency of Natural Resources and Energy, Ministry of Economy, Trade and Industry
TEL: 03-3501-1511 <http://www.enecho.meti.go.jp>
- Energy Conservation Law
Energy Efficiency and Conservation Division, Energy Conservation and Renewable Energy Department, Agency of Natural Resources and Energy, Ministry of Economy, Trade and Industry
TEL: 03-3501-1511 <http://www.enecho.go.jp>
- Electrical Appliance and Material Safety Law
Policy Planning and Evaluation Division, Electricity And Gas Industry Department, Agency of Natural Resources and Energy, Ministry of Economy, Trade and Industry
TEL: 03-3501-1511 <http://www.enecho.meti.go.jp>
- Act Against Unjustifiable Premiums and Misleading Representations (Fair Competition Code)
Consumer Related Trade Division, Trade Practices Department, Fair Trade Commission of Japan, Ministry of Public Management, Home Affairs, Posts and Telecommunications
TEL: 03-3581-5471 <http://www.jftc.go.jp>

4. Labeling

(1) Legally Required Labeling

When moving a camping car carrying over 5 kg of propane gas, the “Standards of the Liquefied Petroleum Gas Safety Regulations” require that a warning sign indicating “high pressure gas” be attached at a location clearly visible from both the front and rear of the vehicle. There are detailed regulations on the size and shape of the warning size.



Contact:

- The High Pressure Gas Safety Institute of Japan TEL: 03-3436-6100

<http://www.khk.or.jp>

Camping cars equipped with refrigerators and other household electrical appliances, when they are not built-in types, must indicate rated voltage, current, frequency, name of importer, and display the PSE mark under provisions of the Electrical Appliance and Material Safety Law.

PSE Mark



(2) Voluntary Labeling Based on Provisions of Law

There is no voluntary labeling based on provisions of law for camping cars.

(3) Voluntary Industry Labeling

Under the Act Against Unjustifiable Premiums and Misleading Representations, the Automobile Fair Trade Council establishes labeling requirements, labeling standards, etc. for catalogs, store displays, newspaper advertisements, etc. Camping cars are subject to these labeling requirements, like automobiles. For details, see the Automobile Fair Trade Guidelines and Manual of Guidelines.

- Automobile Fair Trade Council TEL: 03-3265-7975 <http://www.aftc.or.jp>

5. Taxes

(1) Customs Duties

Customs duties on campers are free.

Fig. 3 Customs duties on passenger car

HS No.	Description	Rate of Duty (%)			
		General	WTO	Preferential	Temporary
8703	Motor cars	Free	(Free)		
8716.10	Trailers and semi-trailers of the caravan type, for housing or camping	Free	(Free)		

Note: Refer to “Customs Tariff Schedules of Japan” (published by Japan Tariff Association) etc. for interpretation of tariff table.

(2) Consumption Tax

CIF x 5%

6. Product Characteristics

Camping cars differ markedly by manufacturer, model line and grade, which makes it difficult to make any overall characterization. Generally speaking, though, American campers usually emphasize power and space while European campers emphasize compactness. Ordinary carmakers usually do not build campers themselves. Instead, most campers come either from so-called coachbuilders or from re-modelers who modify standard production cars and turn them into campers.

* Coachbuilder: manufacturer that combines parts from several different manufactures to produce a vehicle.

Europe and the United States have a lengthy tradition of automotive camping, as well as a large number of fans. The United States is perhaps the world leader in this field. Because of this, American imports tend to predominate in Japan, both in self-propelled and trailer-type campers.

Campers come with a wide range of equipment. Some have only bare minimum fixtures with recreational vehicle, while luxury models may have table and sofas, refrigerators, rest rooms and even showers. Trailer-type campers cost around ¥2 million, while self-propelled campers can cost anywhere from ¥5 million to ¥15 million.

7. Domestic Distribution System and Business Practices

(1) Domestic Market Conditions

The camper market in Japan is just getting on its feet, and it is quite difficult to get an accurate overall picture of market conditions. The penetration rate of campers among the estimated 3 million families who engage in family camping is very low. One reason why campers have been slow to catch on is the shortage of campgrounds in Japan built to accommodate automotive camping. In addition, among the reasons why campers have been slow to catch on are:

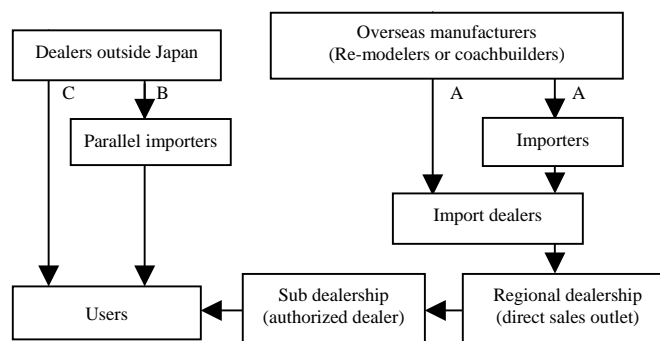
- 1) Lack of a history of motorized camping activities in Japan.
- 2) It can be hard to find suitable garage space.
- 3) Because most auto campgrounds in Japan are designed for recreational vehicles, driving large campers to the campsites can be difficult. According to the Leisure White Paper, the number of auto campgrounds is estimated at about 900-950, of which auto campgrounds with above-average facilities account for about 250.
- 4) Campers are relatively expensive compared to an ordinary passenger car.
- 5) Sometimes camper owners find they lack sufficient leisure time to enjoy camping, in which case the cost of storage and maintenance becomes burdensome.

However, as consumer interest in automotive camping increases, auto camping facilities have been rapidly upgraded. More and more campgrounds are installing Western-style facilities for recreational vehicles and auto campers, such as AC outlets, fresh-water facilities and wastewater facilities at individual campsites.

(2) Distribution Channels

Campers are generally imported either direct from the foreign manufacturer (manufacturer agreement imports) or from a dealership in another country. Parallel imports and direct imports by individuals fall into the latter category. Manufacturer agreement imports supply only new campers, whereas purchasers can also buy used campers from parallel importers or by importing direct themselves. Campers are generally distributed either through import dealers who import direct from overseas manufacturers, through direct sales outlets (regional sales outlets) of importers, or through authorized dealers (sub dealers) who obtain their inventory from importers. Parallel importers have no contractual tie with the overseas manufacturer. Instead, they obtain their inventories from dealers in other countries.

Fig. 4 Distribution channels for campers



A: Manufacturer Agreement Imports, B: Parallel Imports, C: Direct Imports by Individual

(3) Key Considerations for entering the Japanese Market

The camper market has experienced spectacular growth. However, the imbalance between sales and after-sales service has led to the problems discussed below. Prospective importers should consider these points carefully before entering the market.

- After-sales service problems

Increased sales have led to a shortage of service technicians. In addition, high land prices and land use restrictions in or near major metropolitan areas makes it increasingly difficult to operate a parts warehouse or a repair facility.

- Problems with excess used cars

Much of the support for the imported camper market is coming from replacement sales (in which current owners of Japanese or foreign cars trade in their old cars for a new foreign car). These need to be more receiving and storage facilities for the increasing numbers of used cars taken in trade, and there also need to be more used car centers and exhibitions.

8. After-Sales Service

Most carmakers delegate responsibilities for after-sales service to the retailer who sold the car originally. Warranty work and recall work necessitated by some defect are the responsibility of the manufacturer, but in practice the retailer under contract also provides these functions with the manufacturer. Importers and imported car dealers are gradually increasing both the number and the quality of their new car preparation facilities, parts centers showrooms and repair facilities. The importer with the largest dealer network now has some 30 dealerships. However, companies differ in their dealer network development capabilities.

9. Related Product Categories

Related product categories include passenger cars, cargo vehicles and special use vehicles (fire trucks, crane trucks, etc.). The regulatory environment for these vehicles does not differ considerably from that of campers. For details about passenger cars, please refer to “III-1 Passenger Cars” in this guidebook.

10. Direct Imports by Individuals

Parallel and direct imports do have certain advantages: 1) prices are lower and 2) purchasers can pick campers with performance features lacking in campers sold in Japan. However, the manufacturer will not take any responsibilities for modifying the car to meet Japanese emission and safety standards, and it may prove difficult to get the car maintained and repaired. There are five specific problems that can occur.

1) Cost

Modification work required to bring the vehicle into compliance with Japanese standards can be very costly.

2) Parts

Sometimes there is no choice but to order replacement parts directly from the manufacturer in another country.

3) Repair facilities and technology

Similarly, sometimes service technicians may need specialized tools, facilities or technologies to repair a camper not designed for use in Japan. Sometimes repairs cannot be done even by an authorized service facility.

4) Warranties

Camper makers offer warranties for a certain period of time and a specified distance driven after sale. The warranty often has very precise restrictions on the area where the camper can be used and serviced, and parallel imports and direct individual imports often cannot receive warranty service work.

5) Recalls

When a product defect results in a recall, the manufacturer notifies owners directly. However, the notice may not reach the owner of a parallel import or direct import, which interferes with the recall process.

11. Related Organizations

- Japan Automobile Importers Association (JAIA-All imported cars)
TEL: 03-3222-5421 <http://www.jaia-jp.org>
- Foreign Automobile Importers Association (FAIA-Parallel imported cars)
TEL: 03-3375-8611 <http://www.faia.or.jp>