

# Electronic Work Diary (EWD) Policy Framework and Standards Feedback Form

This form should be used to provide technical or administrative feedback with the Electronic Work Diary (EWD) Policy Framework and Standards. Through these documents the NHVR is seeking feedback on how it intends to manage approvals of electronic recording systems for use as part of EWD.

Completed feedback forms should be submitted by email to [fatigue.management@nhvr.gov.au](mailto:fatigue.management@nhvr.gov.au)

<p><b>Title of feedback:</b></p>	<p>ALC Response to the proposed EWD Policy Framework and Standard</p>
<p><b>What section of the EWD Policy Framework and Standards does your feedback relate to:</b></p>	<p><input checked="" type="checkbox"/> Appendix A – EWD Policy Framework</p> <p><input checked="" type="checkbox"/> Appendix B – EWD Standards</p>
<p><b>Please provide your feedback:</b></p>	<p>The <a href="#">Australian Logistics Council (ALC)</a> is the peak national body representing the major and national companies participating in the freight logistics industry, with a focus on national supply chain efficiency and safety.</p> <p>ALC has long supported making it compulsory for heavy vehicles to be fitted with telematic equipment. A list of policy statements made by ALC on the issue of mandatory telematics is provided below.</p> <p>ALC members prefer the adoption of Option 2, as set out in the <a href="#">Notice of Proposed Rulemaking (NOPR)</a>. This is because there is an expectation, noted in the <a href="#">Queensland Transport and Main Roads Heavy Vehicle Telematics Strategy 2016</a>, that EWDs will be compulsory in the next couple of years.</p> <p>This is a possible outcome of the current National Transport Commission (NTC) review to explore options to increase the uptake of telematics and other technologies for regulatory and revenue purposes. The findings from this review will be presented to the Transport and Infrastructure Officers Committee (TISOC) in March 2017, and forms part of the <a href="#">Transport and Infrastructure Council's National Policy Framework for Land Transport Technology</a> (see Action Item 9).</p>

	<p>It follows that from a policy perspective, it is erroneous to frame standards on the basis of encouraging voluntary take up of telematics, as it would appear that telematic equipment will be made mandatory sooner rather than later.</p> <p>ALC therefore believes that the EWD Policy Framework and Standard should be developed with a view to be consistent with, or be incorporated within, the <a href="#">National Telematics Framework</a>, currently managed by Transport Certification Australia (<b>TCA</b>).</p> <p>This means the <a href="#">Telematics Data Dictionary</a> (which would allow the EWD Standard to be aligned with the data definitions and formats used across other telematics applications) and the Telematics In-Vehicle Unit (<b>IVU</b>) Specification should be the relevant standard on which a compliant EWD should be based, if for no other reason than the cost that would be imposed on operators who purchase an EWD complying with one technical standard, and then must shortly thereafter purchase a unit complying with a different standard.</p> <p>Any consequential amendments to the HVNL will need to be made.</p>
<p>Please provide a list of supporting documents (if additional documents are provided):</p>	<p><a href="#">Getting the Supply Chain Right</a> – Pages 26-27</p> <p><a href="#">Letter to the Deputy Prime Minister</a> – 19 January 2016</p> <p><a href="#">National In-Vehicle Telematics Strategy</a> – Submission to the National Transport Commission on the DRAFT NTC National In-Vehicle Telematics Strategy: The Road Freight Sector.</p>

<p>Proponent (<i>organisation and primary contact person/details</i>):</p>	<p>Michael Kilgariff</p> <p><b>Australian Logistics Council</b>  <b>Managing Director</b>  <a href="mailto:Michael.Kilgariff@austlogistics.com.au">Michael.Kilgariff@austlogistics.com.au</a>  <b>(02) 6273 0755</b></p>
<p>Date submitted to NHVR:</p>	<p>9 February 2018</p>

Additional information is available from:

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