

18 July 2017

Hon. Stephen Mullighan MP
Minister for Transport and Infrastructure
GPO Box 1533
ADELAIDE SA 5001

Heavy Vehicle Inspection Scheme

Dear Minister

I write regarding the Regulatory Impact Statement (**RIS**), prepared by the Department of Planning, Transport and Infrastructure, that proposes legislative changes which *will require inspection of all higher risk heavy vehicles not already inspected, that are prescribed as exempt or are in the National Accreditation Scheme (Option 3 of the RIS).*¹

It is a fact that the heavy vehicle industry is involved in a disproportionate number of fatalities on Australian roads. However, evidence presented from many sources, including comprehensive analysis by NTI Insurance, shows that in the vast majority of these incidents the heavy vehicle was not at fault.

ALC represents a number of the larger freight logistics companies in Australia, many of whom have operations nationally. We understand that Australia's supply chains do not stop at state borders. Our economy is national – and accordingly a nationally consistent approach to infrastructure and regulation is best placed to deliver national efficiency and safety in our supply chains.

ALC has long advocated a 'one rule book for one national economy' approach, with inspections conducted on the basis of the risk profile of individual operators. ALC and its members are thus disappointed by the recommendation contained in the RIS, because it is contrary to the pursuit of a nationally consistent regulatory framework.

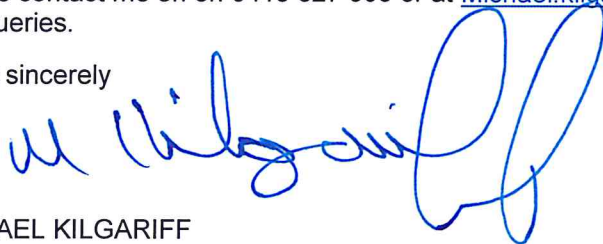
In ALC's view, the RIS is vague by offering no definition about what would constitute "*all higher risk heavy vehicles*". Furthermore the RIS offers no evidence that periodic inspections of vehicles will improve road safety; simply assuming as a base that the new regulations will prevent at least one fatality a year.

Over recent years great strides have been taken to ensure national harmony of approach in heavy vehicle regulation. To introduce new jurisdictional derogations, such as subjecting NHVAS vehicles to inspection, would be a retrograde step.

May I suggest that rather than adopt this new scheme, now is the time to accelerate aspects of the NHVR's Roadworthiness Programme so as to expedite a nationally consistent inspection scheme.

Please contact me on 0418 627 995 or at Michael.kilgariff@austlogistics.com.au should you have any queries.

Yours sincerely



MICHAEL KILGARIFF
Managing Director

CC: Transport and Infrastructure Senior Officials' Committee

¹ Heavy Vehicle Inspection Scheme RIS, p. 4
http://dpti.sa.gov.au/data/assets/pdf_file/0009/320985/HVIS_RIS_May_2017.pdf