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| Record keeping (Fatigue) – Options for streamlining record keeping requirements  | Base case – retain existing record keeping requirements. Option 1a – Remove duplicate record keeping requirements from the law and streamline offences relating to these requirements. Option 1b – Remove administrative process requirements and offences | Option 1a and 1b |
| Scope of fatigue regulated vehicles – considers changes to the scope of which vehicles should be fatigue regulated under the HNVL  | Base case – Prescriptive fatigue requirements for HVs over 12 tonnes only with work diary exemption for drivers doing local work.Option 2a – Prescriptive fatigue requirements for HVs 12 tonnes only, full written work diary requirements for HVs over 12 tonnes Option 2b – Prescriptive fatigue requirements for HVs 12 tonnes and above only, light work diary requirements for lower risk operationsOption 2c – Prescriptive Fatigue requirements for all HVs, full diary requirements for all operators Option 2d - Prescriptive Fatigue requirements for all HVs, work diary exemption for local workOption 2e – Prescriptive Fatigue requirements for all HVs, light work diary requirements for lower risk operations | Our suggested position in respect of the bus industry would be we continue to maintain existing arrangements through the “base case” or 2d, including keeping the inside 100km radius exemption for a work diary.We do not support the implementation of 2a, 2b and 2c and 2e due to the additional administrative burden it would place on operators. |
| Enforcement options to address minor work and rest and admin offences  | Base case: No change to existing arrangements Option 3a – Limit on the timeframe for issuing a work and rest breach infringement. Option 3b – Implementation of a risk profile for work and rest breaches Option 3c – Enable a review of fines for ‘trifling’ administrative offences. Option 3d – Driver defence for minor administrative offences Option 3e – Support the use of formal warnings for admin offences relating to work diaries. Option 3f – Allow for formal education option in lieu of a fine for admin offences.  | Supportive of all options given they would see the removal of punitive measures against operators and greater educative focus. The proposal around review of fines would also be beneficial to operators. |
| Increasing mass limits, General Mass Limits to Concessional Mass Limits | Base case: Retain existing arrangements with potential of a provision for Euro VIOption 4a: Establish new GML in the HVNL by increasing the current GML by 5 percent. The new GML would replace the current CML. No additional mass allowance is provided for Euro VI vehicles.Option 4b: Establish new GML in the HVNL by increasing the current GML by 5 percent. The new GML would replace the current CML. An additional mass allowance is provided for Euro VI vehicles. | Option 4b given it provides for an allowance for Euro VI vehicles. (We assume Euro VI applies to buses and not just trucks)Given the complexity of this issue and significant implications of any changes for our members, we would encourage any change be examined as part of a more comprehensive review of mass limits for the bus industry specifically.  |
| Height limits  | Base case: Height limit remains at 4.3m for general access vehicles. Option 5a: Increase height limit to 4.6m for general access vehicles | No express position but we would note manufacturers would be unlikely to manufacture buses of this size.  |
| Length limits  | Base case: Length limits remain at 19m for general access vehicles. Option 5b: Increase the general access length limit to 20m  | We assume this does not apply to buses. If this is not correct, we support the current prescribed lengths for bus remaining in place. (18m for articulated bus and 14.5 for non-articulated bus)  |
| Option to Introduce National Audit Standard requirements  | Base case: As per proposed arrangements, NAS is prescribed in primary law only, no requirements in regulations.Option 7A: NAS is prescribed in primary law, NAS requirements are included in regulations.  | For those who are part of the NHVAS, this seems reasonable. (Our understanding is not many bus operators are part of the NHVAS) |