

Consultation Regulation Impact Statement (C-RIS)

for the National Heavy Vehicle Law (HVNL) Reform Program.

Submission on behalf of the
Victorian Transport Association
and
Queensland Trucking Association

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1.1 Introduction

The Victorian Transport Association (**VTA**) and Queensland Trucking Association Ltd (**QTA**) has well in excess of 1,000 employer members and are dedicated to the service of members and supporters in all sectors of the transport and logistics industry across Victoria and Queensland.

With over 200 years' combined experience and a specific business focus, we possess the industry acumen, market knowledge and industry contacts that enable members to capitalise on the current commercial and regulatory environments.

Recognised as Australia's pre-eminent multimodal prime contractor and employer organisations in transport and logistics, the associations work with all levels of government, the unions, statutory authorities, and the industry to achieve mutually beneficial outcomes. The VTA/QTA is committed to enhancing the image of the industry while helping to improve the commercial environment for our members to operate.

Both Associations provide a complete body of services for members including industry representation at all levels including government, media, committees and events. Also included are Industrial Relations services, Training and Education, Regulation and Compliance advice and a full body of Networking opportunities.

2.0 THE APPROACH TO THIS SUBMISSION

2.1 Introduction

The introduction of the Heavy Vehicle National Law (HVNL) replaced 13 modern awards and six state and territory transport-related laws. The expectation of the HVNL was that it would be a national standard of compliance for the heavy vehicle industry bringing together the major elements of transport operations, enforcement, and community safety. It is important to understand this legislation was an attempt to bring a coordinated and national approach to the delivery of an efficient, productive, and safe transport system throughout Australia.

In May 2019, the VTA stated in its first submission on the current review process to the National Transport Commission (NTC):

The HVNL in its current form falls short of being truly national and is overly prescriptive and complicated. This review (the Review) of the HVNL will have a significant impact on the heavy vehicle industry. It will determine the shape, practices, and operational standards within the industry that at times falls short of community expectations and struggles to project a positive culture.

The VTA and its members maintain that this Review must ensure that any changes to the law remain focused upon and are underpinned by three key pillars: improved efficiencies, improved productivity, and improved safety outcomes. It is vital that we confront past standards and legal structures

*whereby we build a new HVNL framework which addresses the current problems and short-comings and importantly, ensures that we deliver a far more robust, purposeful and flexible framework in order to meet future industry challenges.
(page 6)*

As stated above, the three core pillars for the Review must be:

- *to improve efficiencies,*
- *to improve productivity and*
- *to improve safety outcomes for members and the industry.*

Both Associations still maintains the above position in November 2023. However, it is disappointed with two key aspects of the Review process to date:

- the unacceptable time it has taken the NTC to advance the Review to this current *incomplete* stage which has involved a period of five years and still proceeding.
- the inability of the NTC to deliver on the intended outcomes of what the original legislation was drafted to address.

In May 2017, both associations carefully reviewed the HVNL and listed the key items which needed to be reviewed (Refer to Appendix 1). We accepted the original scope of the Review but are concerned that there has been a narrowing of the issues in the current Review processes.

There is for example, a lack of appreciation of the current dynamic environment in which the HVNL needs to operate and fully consider and not overlook and underestimate the interconnectivity, influence of technology and decarbonisation and omissions.

We maintain that the transport and logistics industry has been let down by the NTC and the Review process and is concerned that the opportunity to drive effective change of the HVNL has been compromised.

We fully appreciate the importance of this Review, and it has been actively involved in all the consultation processes of the Review. We have also thoroughly reviewed Decision Regulation Impact Statement (D-RIS) and the current Consultation Regulation Impact Statement (C-RIS).

2.2 Executive Summary

We appreciate the importance of this Review, and it has been actively involved in many of the consultation processes and requests from the NTC. We have also thoroughly reviewed the Decision Regulation Impact Statement (D-RIS) endorsed by the ministers at the 9 June 2023 Infrastructure and Transport Ministers meeting (ITMM).

We understand that the current Consultation Regulation Impact Statement (C-RIS) is part of the next phase of the HVNL reform program and focuses upon areas that were not considered in the previous D-RIS 2023.

Given the significant time, engagement, and consultation with Association members and relevant stakeholders in preparing previous NTC review submissions, we have adopted a 'concise response' approach to most of questions contained in the current C-RIS. Where applicable, more detailed responses have been provided where we have deemed it necessary.

The issues raised in the C-RIS and the 25 questions do not address the key issues relating to the broader perspective of general access, a reduction of Red Tape in road access requirements, a reduction in complexity on compliance or an improvement on productivity.

The inability of the NTC to bring Western Australia and Northern Territory into the Review discussions reinforce the fact that this Review is not driving the necessary reform that is required.

The HVNL should be exactly what it states - a National Law. It does not show consideration of other jurisdictions and their issues, and it remains inward looking.

It is disappointing that this Review will "tinker around the edges" and will not deliver what industry and the community it serves with the outcomes, improvements and actions that were the original intention.

3.0 CONSULTATION QUESTIONS

Question 1: To what extent has the C-RIS fully and accurately described the problem to be addressed within the scope of identified issues? What other factors should be considered in the problem statement? Please provide detailed reasoning for your answer.

We have no issue with the accuracy of the information contained in the following sections of the C-RIS; 1 Introduction; 2 Background and 3 Case for Change. However, we have a fundamental concern that the C-RIS document in relation to those matters being treated 'in scope' and 'out of scope'.

On page 16 of the C-RIS document, it refers to:

"Reforms to the structure of the HVNL, duties and driver health, accreditation, technology and data, and delegation of authority, were considered as part of the previous D-RIS process."

We believe that the three problem statements contained in the current C-RIS cannot be adequately addressed without due consideration of the above factors as part of this C-RIS.

As outlined in the introduction, we maintain that this C-RIS suggests a narrowing of the issues compared to the original scope of the Review presented 5 years ago.

Question 2: Has the C-RIS provided sufficient evidence to support the case for government intervention? What else should be considered and why?

We agree with the objectives of the Law outlined on page 35 of the C-RIS:

The object of this Law is to establish a national scheme for facilitating and regulating the use of heavy vehicles on roads in a way that –

- a) promotes public safety; and
- b) manages the impact of heavy vehicles on the environment, road infrastructure and public amenity; and
- c) promotes industry productivity and efficiency in the road transport of goods and passengers by heavy vehicles; and
- d) encourages and promotes productive, efficient, innovative, and safe business practice.
The VTA also acknowledges the limitations does not encompass the Northern territory or Western Australia.

The C-RIS has provided sufficient evidence to support the case for government intervention. More importantly, we want the government to fully accept its responsibilities in driving the necessary changes to the NHVL to *deliver improved efficiencies, improved productivity, and improved safety outcomes for the industry*. This needs to be actioned with a far greater sense of urgency as compared to what has been experienced to date.

Question 3: In addition to the barriers and constraints identified, what other impediments could impact on the success of implementing options presented in the C-RIS?

we understand the barriers and maintains that the original objectives of the Review have not changed, however, we fear that the C-RIS will only review the same barriers which have been evidenced in the original HVNL 2012 framework.

Question 4: Are there any potential changes to the impact analysis methodology that you would suggest? Please provide reasons and evidence.

We have no additional changes to suggest to the impact analysis presented in the C-RIS document.

Question 5: Do you agree with the potential impacts of Options 1a and 1b as described above? Are there any additional impacts you think should be considered?

We agree with the potential impacts of options, **1a and 1b** as described in the C-RIS. We also recognise that the C-RIS refers to the research of the Sleep, Health Foundation, July 2023. It states that the changes to the standard hour schedules in the HVNR will result in greater sleepiness and safety risk compared to the current law.

Even with this being the case, we are concerned that Fatigue Management is being narrowly examined fundamentally from an administrative perspective as part of this C-RIS. We are aware of the 'out of scope matters' contained in this C-RIS document, however innovation and technology of Fatigue Management must be applied when reviewing the management of the fatigue.

We believe that Fatigue Management needs to be totally reworked whereby effective fatigue management is determined before an operator commences work. We must move from the notion of simply monitoring and managing fatigue management through an administrative perspective as demonstrated in the current focus of work diaries.

It is time that a far more sophisticated and 'fit for purpose' approach is taken to fatigue management on a national basis. To achieve this objective, NVNL must have provision to accommodate and adopt current and future technologies which can effectively manage this area and ensure that it is applied to all heavy vehicle operators and drivers.

Question 6: Do you support one or more options to change the scope of fatigue regulated vehicles? Please give reasons for your preference(s).

Both the VTA and QTA support **Option 2c** (*Prescriptive fatigue requirements for all HV's over 4.5 tonnes, full work diary requirement for all operations*) and **Option 2d** (*Prescriptive fatigue requirements for all HVs over 4.5 tonnes, work diary exemption for local work (all HVs)*).

As advocated in earlier submissions, we argue that there should be no differentiation of fatigue related heavy vehicles and that all vehicles greater than 4.5 tonne. Omitting this perspective also discriminates against larger heavy vehicles given that the issues of fatigue management also apply to 4.5 tonne vehicles.

There is also a serious need to raise the awareness, understanding and knowledge of the HVNL and to highlight the fact that it applies to all heavy vehicles greater than 4.5 tonnes. This HVNL awareness issue also involves small, medium, and large organisations. There is a major deficiency of the current law especially in relation to compliance and enforcement.

The buildup of fatigue related issues of a heavy vehicle driver is not bounded by the geography or size of the heavy vehicle. Recognition of the need to ensure all heavy vehicle drivers manage their fatigue at work must be reinforced through the NHVL whereby the drive becomes responsible and is managed accordingly. Option 2c and 2d will enable this outcome to be achieved.

Question 7: Do you have any information to support analysis of these options? Do you have any feedback on the key parameter estimates as presented in Section 6.6.3? Provision of anecdotal evidence would be welcomed.

We do not have additional information to support the analysis of these options. We noted that on page 60 of the C-RIS that the options to expand the scope of fatigue related vehicles would have significant implications for the cohort of vehicles between 4.5 tonnes and 12 tonnes. It has been the VTA's consistent opinion that these changes are necessary to improve safety for the transport and logistics industry.

Question 8: Are there any additional impacts you think should be considered? If so, why?

As stated above, both the VTA and QTA advocate that Fatigue Management should apply to all heavy vehicles greater than 4.5 tonne GVM.

At the same time, the real challenge is for the NHVL to have the ability and flexibility to effectively manage fatigue in different geographical environments. For example, delivery of fuel in northwest of Western Australia as compared to the eastern seaboard of Australia.

From a non-jurisdictional perspective, Western Australian and Northern Territory Fatigue Management regimes work effectively in meeting the needs of operators and drivers who are significantly involved in travelling vast distances. Fatigue Management is managed differently to the current HVNL. It is also one of the reasons for these two jurisdictions not being part of the HVNL.

Given the different demands upon Fatigue Management between states and territories there cannot be a 'one size fits all' approach especially if we want to achieve a national new law. Therefore, there needs to be the establishment of the fundamental 'risks' of Fatigue Management in the new law but still allowing for the 'flexibility' to accommodate different Fatigue Management regimes to be applied in different jurisdictions, such as, Western Australia and Northern Territory.

Question 9: Do you agree with the key impacts that changes to the scope of FRHVs may have on buses, as described above? Do you foresee any additional impacts?

We agree with the key impacts may have on buses, however, the cost to apply the changes is not an excuse to exempt buses in our quest to achieve road safety outcomes.

Question 10: Do you support one or more options to change enforcement of fatigue-related breaches? Please give reasons for your preference(s).

At the very outset, both the VTA and QTA Have provided detailed responses to many of these issues relating to fatigue-related breaches. We have reviewed the content presented and we share the aspirations outlined on page 77 of the C-RIS:

‘.....options to change fatigue enforcement under the HVNL aim to encourage a more risk-based approach to enforcement and this is a key advantage of implementing each of the proposed options. Options to improve fatigue enforcement practices aim to reduce the regulatory and administrative burden associated with minor, low-risk work and rest breaches and instead redirect enforcement resourcing to high-risk, moderate, and major work and rest breaches that may have immediate safety risks. The key benefit to drivers and operators of these options is reduced regulatory burden for work and rest breaches that are considered minor, and no longer pose an immediate safety risk.’

We agree with the inclusion of all six options(3a-3f), as detailed in table 17 on pages 76-77 of the C-RIS. These improvements would deliver a balanced approach that would therefore improve safety and productivity. These enforcement options reflect a maturity of the approach to imposing penalties, reduce roadside frustrations and harmonise the process of fatigue management.

The one consistent disadvantage that was detailed reflected upon a “more resource intensive approach”. This would be dissipated by greater use of technology and data sharing by the respective enforcement agencies.

We also understand that the Review will no doubt settle on a combination of several of the options. However, as stated in numerous VTA submissions already presented during the life of this Review, we argue that there must also be a dramatic change in mind-set whereby the education and training of drivers is addressed.

The current situation is sub-standard and unacceptable. The ‘education’ of drivers must be front and centre if we are to achieve effective change.

During our consultation process with members, it was ‘loud and clear’ that VTA members strongly expressed that effective reform of the HVNL must also provide ‘real time’ and up to date information for operators via the respective compliance systems. The system data sharing between agencies needs to be secure, integrated and fit for purpose.

It requires a concerted effort by all regulators and government agencies to agree upon the national systems and processes.

Question 11: Are there any implications of options to change enforcement of fatigue-related breaches you think should be considered? What issues would need to be considered as part of implementation of these reforms?

The feedback is very clear from Association and the general transport industry. The new Law must be carefully restructured whereby the penalties are more balanced in approach and better aligned with the actual safety significance of the damage, defect, or repair, especially in relation to major and minor defect notices.

We need to ensure that we use technology to reduce red tape and the cost of compliance to organisations. The Review provides the opportunity to ensure that technology, data collection and the transfer of effective information is treated as a priority of this law reform.

Significant advances of technology have been witnessed in relation to Fatigue Management and driver distraction and many other areas. The improvements in safety monitoring have been exponential in recent years and these advances are guaranteed to continue. The VTA is not concerned about what technology is used if it is approved and meets the regulatory standards requirements. We advocate for better use of technology in the new Law.

We also argues that by adopting, integrating, and connecting the ‘right’ technologies, law makers and particularly the regulators and operators are in an excellent position to maximise current and future systems and tools to significantly reduce red tape and time-consuming administrative burdens which currently prevail.

Organisations want consistency, integration, interconnectivity, speed, accuracy, and security at all levels of transmissions for their operations. The red tape must be reduced as well as, the unacceptable duplication of processes and the need to create and invent ‘work arounds’ to run their businesses and deliver timely levels of service for their clients. The levels of frustration that prevail in relation to the current five sets of regulations of HVNL should not be under-estimated.

Question 12: If some of the proposed changes to enforcement of fatigue related breaches were adopted, would this give you confidence to transition your business to EWDs?

The VTA would have no issue with the proposed changes to enforcement being adopted. With due respect to the NTC, and given the duration of this Review, industry has already moved on. They continue to embrace technology and seek viable solutions for their businesses. This is not ideal to achieve the desired productivity gains, however, the discussion contained in the C-RIS is at best, underwhelming.

Question 13: Taken as a package, would these reforms to fatigue management create a fairer regulatory approach overall?

By including the options as stated within the C-RIS and noted by the Associations, these reforms would create a fairer, more productive, and more importantly, a safer working environment for all heavy vehicle drivers.

Question 14: Regarding Option 3A, would a timeframe of 14 days or 28 days be more appropriate? Please provide reasons for your answer.

A time frame of 14 days would be appropriate. The key issue is that any regulation burden taken off the driver should be the major focus.

Question 15: Which option (either Option 4a or 4b) would deliver the greatest benefit? Which would have the simpler implementation pathway? Please give reasons in your response.

We concur with the identified problems articulated in the C-RIS and has consistently prosecuted the case to improve access arrangements for heavy vehicles by reducing administrative burden and productivity.

The **Option 4b** will deliver the greatest benefit and the rationale and arguments presented in this section of the C-RIS have been clearly articulated.

While recognising the complexity of the issues, the transport and logistics industry is nevertheless concerned and frustrated by the total unacceptable amount of time it takes for changes to be reviewed, developed, and implemented by policy makers, regulators, and governments in Australia.

We need to be far more agile, flexible, and responsive to the market and the new Law must achieve marked improvements if we are going to be more efficient, productive, and safer. It is also shared by industry that a greater 'sense of urgency' and commitment to effective change is paramount.

Most heavy vehicles in participating HVNL jurisdictions are general access vehicles with general access to the road network. This means the HVNL does not restrict vehicles from accessing any road without a permit or notice.

We recognise the importance of having the ability for mass limits to have authorisation to exceed the general mass limits. VTA is also conscious that increased mass limits could have a negative affect and cause premature denigration of road conditions.

We support **Option 4b**, however, the NHVL must consider the challenges and be able to accommodate the changes, the specifications involved with alternative fuel vehicles and must be considered as part of this Review.

The context upon which heavy vehicles are assessed for access to roads is too complex, it does not acknowledge the reasons why these regulations were originally established, and it does not encourage the variety of vehicle combinations which are now available.

No recognition of alternative fuel vehicles has come into consideration when the road freight industry is being pushed into this area very quickly through government emissions policies. This Review should be taking the approach of including these vehicles and ensuring that the road freight industry is not held to ransom on transition in the future.

Question 16: What are the main benefits for industry in simplifying mass limits to GML and HML?

The obvious benefits are that the increase payloads will increase productivity. Reducing the layers and complexity of the heavy vehicle access parameters would see greater flexibility of equipment, increase in HVNL compliance and an improvement in productivity.

The bureaucracy supporting the current system reflects the inability of regulators to truly understand the nature of heavy vehicle driving and the inherent pressures from trying to maintain an operation that meets all the access requirements.

Distance travelled and road wear costs are still an assumptive position as not all heavy vehicles travel at fully loaded weights or ever at their maximum weight allowable. In fact, the VTA contends, that approximately 47% of all heavy vehicle movements are done while the vehicle is empty.

Question 17: Alternatively, would there be value in creating a ‘new CML’, as an incentive for mass accreditation, between the proposed “new GML” and current HML?

This Review should be endeavouring to reduce red tape and delete the current complexities of Heavy Vehicle access to public roads. This question does not meet these objectives.

Question 18: Could reforms that make it easier for operators to operate at CML without the need for accreditation lead to any adverse outcomes to road safety or road infrastructure?

It needs to be highlighted that road, safety and CML have not been linked to major road accidents and adverse outcomes to road infrastructure. We maintain that trying to link mass outside the design engineering parameters is an issue which need to be discussed.

Question 19: Given increased vehicle height limits already available to operators through existing laws and notices targeted at specific supply chains, would a general increase in vehicle height allowances provide material productivity benefits (i.e., reductions in heavy vehicle trips)?

Current road infrastructure parameters are the major barrier to addressing heavy vehicle height limits, Of course, lifting height limits will improve productivity for some types of freight. however, the current infrastructure remains the major restrictor.

Until all planning agencies agree to lift their minimum gross road infrastructure height parameters to a greater level, that is 5.5 metres, there will not be the ability to take advantage for greater vehicle height without increasing risk and incidents.

Question 20: Could reforms that make it easier for operators to operate at increased vehicle height limits lead to any adverse outcomes to road safety or road infrastructure? Are there options (e.g., vehicle or load type limitations) to mitigate any increased risk of adverse outcomes?

The increase height limits are usually for light cubic freight. this question reinforces the road planning is not keeping up with vehicle standards. It is interesting to note that Tasmania, by way of example, is leading the way by ensuring the bridge structures are constructed at least with 5.5 metres clearance.

Question 21: Given increased vehicle length limits already available to operators through existing PBS scheme and notices, would a general increase in vehicle length limits provide material productivity benefits (i.e., reductions in heavy vehicle trips)?

A general increase in vehicle link limits would provide material productivity benefits for the industry and would be a key driver for increase productivity.

Question 22: Could an increase in vehicle length limits enable newer, more innovative vehicle/trailer designs? What types of supply chains could benefit?

The road transport industry consists of approximately 40 different sectors whereby a vast range of vehicle types and configurations are utilised. We maintain that all sectors would benefit from increased vehicle length limits and would encourage and enable more innovative, heavy vehicle trailer designs.

Question 23: Could reforms that make it easier for operators to operate at increased vehicle length from 19 to 20m lead to any adverse outcomes to road safety or road infrastructure? Which risks would any regulatory conditions mitigate and what controls could be put in place?

The increased vehicle mass limits would need to be considered in the road infrastructure design whereby sweep paths would need to accommodate the necessary changes and it is important to note that sweep paths would need to be modified and to handle the different dynamics of the longer vehicles.

Addressing light sequencing across the freight network would also need to be carefully considered. We also believe these changes could be accommodated in the quest for improve productivity. Both Associations believe that the evidence does not suggest that increased vehicle length would have a negative impact upon road safety.

Question 24: Do you have any comments on the cumulative impact of increasing general access limits for vehicle mass, length, and height? Please give reasons and evidence where possible.

We have concerns that road authorities will be unable to keep pace with the changes associated with increasing access limits for vehicle mass, length, and height. We require a more connected

and approach to road planning and include forward thinking to ensure future related structures are carefully incorporated into forward planning.

There is very little feedback to the road freight industry on the effects to road infrastructure based upon the type of freight that is carried on our roads. The access parameters for heavy vehicles, controlled by state jurisdictions appear to be algorithm based and do not reflect the actual affect that certain vehicles and freight types may have road infrastructure or community safety.

Likewise, there is little consideration of the development of safe systems that have been developed into heavy vehicles since 2012. It's just not about increasing vehicle dimension parameters but rather the establishment of how safety and productivity improvements can be delivered at the same time.

Question 25: Do you agree with the potential impacts described regarding the potential inclusion of NAS requirements in regulations? Are there additional impacts you think should be considered?

After reviewing Section 8 of the C-RIS, we welcome the development and implementation of a NAS and that it should be prescribed in primary law and NAS requirements should also be included in regulations.

Both Association also concurs with the final paragraph on page 112 of the C-RIS:

“It is imperative that the NHVR conducts further research to fully comprehend the potential impact on auditors resulting from changes to audit procedures due to the development of NAS. The implications of incorporating NAS requirements into regulations are yet to be fully realised and could significantly affect operators and auditors. Therefore, the NHVR must prioritise the development of NAS and conduct thorough planning to ensure a smooth transition for all involved parties”.

The current NHVAS system has only one major operating flaw and that is the accreditation process of auditors. The NHVAS and VAS should be managed by the NHVR.

4.0 SUMMARY

The VTA and the QTA believe that this Review provides an excellent opportunity to address the shortcomings and issues associated with the current HVNL. It also acknowledges the significant complexities involved in reviewing and changing the current HVNL and legislation.

Our Associations and our members maintain that this Review must ensure that any changes to the HVNL remains focused upon three key pillars: *improved efficiencies, improved productivity, and improved safety outcomes.*

It is vital that we ‘get it right’ whereby we build a new HVNL framework that effectively addresses the current problems and short-comings and ensures that we deliver a far more robust, purposeful, and flexible framework to meet future challenges of our industry.

The NHVL was first implemented in 2012 with a stated review date of every five years. It has now been six years since the first Review was due. It is the heavy vehicle industry, its customers and the general consumer who have not been able to take advantage of a Law that should deliver improved road safety, economic productivity, and recognition of the changes in equipment and government policy.

The VTA and the QTA recommends that this Review process be completed with a greater sense of urgency with the next Review started immediately thereafter.

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Appendix 1 - Heavy Vehicle National Law Review

Prepared May 2017

The HVNL is about to be reviewed with changes that will impact the heavy vehicle industry in both a positive and negative manner. Led by the National Transport Commission, this review will determine the shape, practice, and operating standards that at this time fall short of community expectations and struggles to protect a positive culture.

The following table is the list of the Victorian Transport Association and the Queensland Trucking associations 's key issues and sections that need to be included in the Review of the Heavy Vehicle National Law. Each of these items has been detailed in this context and can be discussed at the appropriate time.

Existing Sections for Review	Description
Enforcement Powers	Risk based approach
Penalties	Delineate with objectivity
Fatigue Management	Include < 100lm and down to 4.5T GVM
Suspension / Emissions	Mandate minimum Standards
Maintenance Standards	Definition and education
Weight / Mass Parameters	Desensitize dimension
Vehicle Combinations	Commit to broader acceptance
Vehicle Life	Factor newer HV's into the law
Additional Sections for Inclusion	Description
Telematics and Standards	Currently little reference
Education of Industry	Little formal support
Centralised Database	Held by the Regulator
National Harmonization	Six major issues that could be harmonized
Contracts	Minimum standards
Accreditation	Take out the commercial value
Access	Broaden the access based upon accountability, compliance and geography
National Road Capacity Plan	Commit to an ongoing awareness and data collection.
National Regulator	Better define the terms of reference for this very important instrument.
Minimum Operating Standards	Clearly define where the bottom sits with operating standards
Additional Concepts to be Considered	
Recognition of geographic nature	Different Regimes
Transport services number	Knowledge acceptance
Safety Covenant	Agreed position
Licencing/Training Standards	No reference
Lowest Level Technology	No technology
Education Obligations	No Reference
Penalties/ Points/ Productivity	No Acknowledgement of task
WA + NT Included	No Effort