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Government of South Australia

Department of Trade and Economic
Development

COMPETITIVENESS COUNCIL INDUSTRY REVIEW

HEAVY VEHICLE ROAD TRANSPORT

Final Report

Office of the Economic Development Board

August 2008

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1. Executive Summary

South Australia's Competitiveness Council was established in 2006 to identify, develop and champion reforms that enhance the State's competitiveness and generate further investment. The State Government has set a target of saving business \$150 million a year in order to fulfil its commitment of reducing red tape by at least 25% by July 2008.

As part of this project, the Council secretariat has talked directly with representative groups, individual businesses and unions through a series of industry reviews. The aim was to elicit information about the issues of concern 'at the coalface' and identify practical initiatives for cutting red tape. The Heavy Vehicle Road Transport Industry review is the fifth in this series.

This report summarises the findings of the review and lists the actions the Government has agreed to take to reduce red tape in response to the issues raised.

Industry accepts that effective regulation is required for the social, environmental and economic wellbeing of the State and its people. However, the Council and the State Government recognise that some regulations can impose unnecessary compliance burdens on business, and impede competition, productivity and investment in the State. It is one of the purposes of this review that, where possible, these hindrances be identified and removed, or amended, without compromising the net benefits of the regulation.

1.1 Key Findings

The key issues drawn to the attention of the review team, in written submissions and during interviews, concern:

- Permits
- Registration and licensing
- Accreditation
- Inspections

- Compliance and enforcement
- Fatigue management
- Regulations and legislation
- Employment and training

These are discussed in some detail in Section 8 of this paper.

2. Introduction

The objective of this review is to identify opportunities to reduce State Government-related administrative and compliance costs associated with operating a business in the heavy vehicle road transport industry, while ensuring that the living and working environment is safe.

The Department of Trade and Economic Development (DTED) conducted this review jointly with the Department for Transport, Energy and Infrastructure (DTEI).

3. Background

Heavy vehicle transport plays an important role in supporting the State's economy by enabling business to access raw material and primary produce, to move products to and from factories, and to transport goods to shops and homes. Developing a road network that supports this freight task in a way that is the most efficient possible and is safe for all road users is a fundamental requirement in achieving a sustainable and environmentally friendly transport system.¹

Heavy vehicle operations are divided into three categories:

- 1) *General Access* – Vehicles are allowed on all roads in South Australia subject to any local road or bridge restriction (e.g. semi-trailers).
- 2) *Restricted Access by Gazette Notice* – Restricted Access Vehicles (RAVs) can only operate on approved routes due to their large size and

¹ Heavy Vehicle Access Framework, DTEI, July 2006

mass (e.g. B-doubles and road trains). Controlled Access Buses for carrying passengers and special purpose vehicles (e.g. front-end loaders, mobile cranes and grain harvesting machines) are also included in this category.

- 3) *Restricted Access by Permit* – Permit operations cover the transport of large, indivisible items (as distinct from general freight loads); that is, loads that cannot be readily transported with general access mass and dimensional limits (e.g. transportable homes and earthmoving equipment).²

Table 1: Number of businesses by segment and employment size, South Australia, 2003/04

Business numbers (based on ABN counts)	Industry (ANZSIC 61)	Road Freight Transport (ANZSIC 611)	Road Passenger Transport (ANZSIC 612)
Employing 1-19	1510	1328	182
Employing 20-199	n/a	n/a	n/a
Employing 200+	n/a	n/a	n/a
Total (employing)	1667	1456	211
Total (non- employing)	6923	3367	3556
Total	8590	4823	3767

n/a = not available for publication

Source: ABS, Counts of Business by Industry (SA), June 2004, Cat No 8161.0.55.001

The Australian and New Zealand Standard Industrial Classification (ANZSIC) group Division I: Transport and Storage includes all units mainly engaged in providing passenger or freight transport by road, rail, water or air; terminal facilities for passengers or freight; services related to transport such as car parking, stevedoring, harbour services, navigation services, airport operation or space port operation; booking, travel, freight forwarding, crating or customs agency services; and storage facilities. Units mainly engaged in operating

² Heavy Vehicle Access Framework, DTEI, July 2006

pipelines for the transportation of oil, gas etc on a contract or fee basis are included in this division.³

As at November 2007, a total of 414,900 people were employed full-time in the Transport and Storage sector nationally, with 21,900 of them in South Australia.⁴

South Australian businesses operating in the heavy vehicle road transport industry are required to comply with the *Road Traffic Act 1961*. Further requirements are listed under the:

- Australian Road Rules
- Road Traffic (Vehicle Standards) Rules 1999
- Road Traffic (Driving Hours) Regulations 1999
- Road Traffic (Mass and Loading) Regulations 1999
- Road Traffic (Miscellaneous) Regulations 1999
- Road Traffic (Oversize or Overmass Vehicle Exemptions) Regulations 1999
- Road Traffic (Road Rules – Ancillary and Miscellaneous Provisions) Regulations 1999

A number of *South Australian Government Gazette* notices have been issued and are required to be followed by industry operators.

4. Scope

The scope of the review is to identify:

- 1) Steps that Government could take to:
 - Reduce the compliance burden on business (e.g. by simplifying regulations and licences that cause the biggest problems).
 - Remove or reduce any unnecessary, overlapping, repetitive or inconsistent regulation.

³ ABS, 1292.0 – ANZSIC, 1993

⁴ ABS, 6291.0.55.003, Labour Force, Australia, Detailed Quarterly, Nov 2007

- 2) Ways of using technology to reduce red tape and simplify business relationships with government.
- 3) Identify South Australian priorities for reforms that will improve productivity for possible inclusion on the national regulatory reform agenda.

5. Methodology

The review began with desk-based research into government regulations covering this industry. The review team then met with representatives of the relevant industry associations and individual business operators. The interview list provided by DTEI consisted of members of the Heavy Vehicle Industry Forum.

During the review process:

- Seven industry associations were interviewed.
- Nine individual business operators were interviewed.
- The Transport Workers Union was interviewed.
- Formal submissions were received from the Bus and Coach Association, the South Australian Crane Association, the South Australian Farmers' Federation, the South Australian Freight Council, the South Australian Road Transport Association and the Scott Group of Companies.

In conducting interviews with people in the industry, the review team used a set of questions as a starting point for discussions (Attachment 1).

It was also explained that the aim of the review was to find practical, logical ways to reduce regulatory time and costs, without compromising social, environmental and economic objectives.

An Industry Review Reference Group was appointed to oversee the process.

It comprised:

- Mr John Rau, MP, Convenor
- Mr Raymond Garrand, Chief Executive, DTED
- Mr Jim Hallion, Chief Executive, DTEI
- Mr Peter Siebels, Board Member Business SA (and Chairman of Partners KPMG SA)
- Bus and Coach Association (BCA)
- Civil Contractors Federation
- Small Business Development Council
- South Australian Freight Council
- South Australian Road Transport Association (SARTA)

A number of relevant government agencies were consulted so the review team could gain a more thorough understanding of specific issues raised by businesses. The agencies included:

- Department of Education and Children's Services (DECS)
- Department of Further Education, Training and Employment (DFEEST)
- SafeWork SA, Department of the Premier and Cabinet
- South Australian Police (SAPOL)

The Reference Group considered all issues raised and, where appropriate, made recommendations for possible action and referred them to the Competitiveness Council for endorsement.

Some issues raised by respondents were not included in the analysis as the information was found to be inaccurate, out of scope, or no longer applicable.

6. National Perspective

The Bureau of Transport and Regional Economics forecast that Australia's land freight transport task will double by 2020 from 2000 levels, increasing from 268 to 523 billion tonne-kilometres.⁵

Forecasts clearly indicate that adverse impacts will be greatest in urban areas, where congestion from cars compounds the impact of the freight task growth. Annual growth forecasts are highest for Darwin (3.53%), followed by Brisbane (2.98%), Perth (2.93%), Canberra (2.78%), Sydney (2.74%), Melbourne (2.52%), Hobart (2.05%) and Adelaide (2.01%). Without action to manage the impact of freight, our economic growth, safety and environmental performance will be seriously jeopardised.⁶

The State Government is working at the national level to progress regulatory reforms through the Council of Australian Governments (COAG), the Council of the Australian Federation, and numerous ministerial councils. These reforms include red tape reductions that address some of the issues raised in this industry review in the areas of vehicle registration, restricted access vehicle (RAV) access to the road system, one-stop-shop approach to government, mutual recognition, national uniformity of rules, bus driver accreditation, and heavy vehicle driver licensing. Implementation of recommendations arising from this review will need to take account of national developments.

A number of transport reform initiatives are being progressed under COAG, in recognition of the significant forecast growth in Australia's domestic freight task, including:

- *Development of Performance-Based Standards (PBS)* – as a key productivity reform with the potential to replace prescriptive rule making for heavy vehicles.

⁵ Facts on Freight Growth, National Transport Commission Australia Information Bulletin, February 2006

⁶ National Transport Commission, *Twice the Task: A review of Australia's freight transport tasks*, February 2006

- *Pricing* – a phased approach to the reform of road pricing aimed at promoting more efficient, productive and sustainable provision and use of freight infrastructure.
- *Intelligent Access Program (IAP)* – IAP will allow monitoring of operating conditions (location, time of day, speed) through GPS by certified service providers, with exception (breach) reports supplied to road agencies.
- *Access to under-utilised infrastructure* – Linking Safer Management of Australian Road Transport (SMART) trucks with vehicle tracking for route compliance (IAP) and direct-user charging has the potential to increase productivity where there is unused capacity in the road network, while protecting vulnerable roads and bridges.
- *Heavy Vehicle Road Transport Driver Fatigue* – Implementation of national legislation to address fatigue risk within the transport sector.
- *Higher Mass Limits (HML)* – Increased network access for HML heavy vehicles with road-friendly suspensions.⁷

In May 2008, the Australian Transport Council (ATC) Ministers agreed their goal is to deliver a seamless national marketplace that will allow for the efficient, productive, safe, sustainable and timely provision and use of transportation infrastructure and services. Ministers reached in-principle agreement that two key initial steps towards achieving this national marketplace are to introduce a national registration scheme for trucks and to establish a single national licence for truck drivers.

7. Recent South Australian Government Initiatives

State Government agencies are responsible for the management of a diverse range of regulations affecting business and the broader community. DTEI has initiated the following reforms to benefit the heavy vehicle road transport industry and contribute to the targeted 25% or \$150 million reduction in red tape.

⁷ COAG Transport Reform, National Transport Commission Australia Information Bulletin, February 2006

7.1 Heavy Vehicle Access Framework

The Heavy Vehicle Access Framework (HVAF) provides long-term policy and strategic direction to improve the regulatory regime and route network access for heavy vehicles and RAVs in South Australia. Without compromising road safety, the HVAF achieves a balance between industry productivity, environmental impacts, community amenity and equitable road/rail competition. It will be updated as necessary with transport reform initiatives and changes to route networks consistent with the freight task requirements.

7.2 Gazetted Routes for Restricted Access Vehicles

This project aims to reduce the need for individual permits by gazetted route networks for RAVs (e.g. B-doubles and road trains). RAV operators require permits to access roads that have not been gazetted for use by their particular class of vehicle. If local government roads are involved, this requires obtaining clearances from councils as well as a permit from DTEI. A \$56 application fee is attached to every permit request. To date, 3,000 permits out of 15,000 have been eliminated. This will save industry the cost of permit fees and the cost (time and resources) of preparing and lodging applications for permits.

7.3 Electronic RAV Route Maps

This project aims to provide web-accessible route maps in electronic form for use by RAV operators. Present regulations require RAVs to carry printed copies of gazette notices that include route maps that are bulky to carry, can be difficult to read because of the small scale of the maps in some areas, time-consuming to update and expensive to print and distribute. Under the new mapping system, drivers are no longer required to carry the Approved Route Map book and will only be required to carry maps specific to the route they are travelling.

7.4 Vehicle Inspection Task

This task proposes to streamline inspections to cut the waiting times for all vehicle inspection types and reduce the need for mandatory annual

inspections of RAVs. Mandatory annual inspections for RAVs are increasing waiting times for other inspections and defect clearances. The aim is to reduce waiting times (from five to six weeks to less than two weeks) for the removal of defect notices and other inspections in addition to discontinuing the requirement for an annual inspection of RAVs and replacing this road safety intervention with on-road heavy vehicle safety audit inspections.

7.5 RAV Route Assessments

This initiative aims to expedite route assessments for proposed RAV routes by enabling the private sector to engage authorised assessors to undertake the assessments. The Road Traffic Act 1961 requires specific approval (through permit or gazettal) of a route before use by RAVs. Currently all RAV route assessments are undertaken by departmental assessors at no cost to the industry. However, due to limited resources, there is a backlog of assessments and long waiting times for the industry. It is anticipated that waiting times will be reduced from six to three months for approximately 100 route assessments a year.

8. Compliance Issues

The remainder of this report discusses the compliance issues raised by businesses and industry associations, and outlines the Government responses to them.

8.1 Permits

8.1.1 Clearances and permits

Issues:

- The process of obtaining clearances and permits is time-consuming
- Operators are constantly following up access approvals

The review team was advised that obtaining clearances from local councils and permits from State Government departments is a time-consuming and expensive process and the paperwork involved is considered excessive. Local

councils in particular can be slow in processing applications, which affects operators' efficiencies. In some cases, low loader and crane operators have to also seek clearances from various regulatory bodies. Operators spend considerable time following up for access approvals.

Travel restrictions on cranes and low loaders are considered unfair, unlike B-doubles, which can operate 24 hours a day.

Industry has made the following suggestions:

- South Australia should adopt the Victorian permit model, whereby an annual fee is paid by a company, allowing all its trucks to travel on nominated routes. Like in the Victorian model, gazettes should be changed to maps of areas/locations/routes that are excluded. This would cut the number and extent of maps required to be carried.
- A one-stop-shop where heavy vehicle operators can go to apply for all permits (e.g. DTEI) should be established.
- A booklet should be issued, listing where heavy vehicles cannot travel, rather than where they can, as this would be easier to understand.

Government Response:

The government has actively communicated and negotiated with councils to encourage the development of route networks for classes of vehicles. This process has commenced for RAVs (B-doubles and road trains), with the majority of councils cooperating to gazette route networks, which eliminates the need to obtain clearances from various councils and has resulted in a reduction of approximately 3,000 permits a year. Gazetting general freight, commodity and permit routes will eliminate the need for operators to obtain clearances from various councils. As the system rolls out there will be no requirement for permits for these classes of vehicle. There is no fee for using the gazette system.

For cranes, the Government has negotiated with the Adelaide City Council to develop a crane network with specified conditions to minimise the need to

obtain clearances. The networks were developed with the intention to gazette at a future date.

Travel restrictions on cranes/low loaders are being addressed through the issuing of guidelines for the unrestricted operation of low loaders throughout the day.

The Government is working on a project which aims to streamline processes for applying for Government permits and licences through a single entry point. If this project is implemented it would minimise the need for businesses to approach individual government agencies to apply for permits and licences.

The Victorian model for mapping gazetted routes is inconsistent with current (South Australia and national) practice of explicitly defining specific heavy vehicle route networks.

The Government has agreed to:

- Implement reforms for cranes and low loaders.
- Streamline permits by developing assessment guidelines and codes of practice.
- Identify and discuss options to address the administrative burdens.
- Develop a gazette process for the management of cranes in consultation with the Local Government Association and industry.
- Introduce online application and payment for permits.
- Continue to update systems to bring about efficiencies and streamline processes for both government and industry.
- Develop a night travel policy for low loaders.

8.1.2 Hay bale permits

Issue:

- The need for a single hay bale permit
- Simplification of the permit system

The review team was advised that to save time, money and paperwork, there should be one permit that covers both round and square hay bales.

Simplification of the permit system is needed for over-dimensional loads (e.g. the movement of 8x4x4 hay bales on the bottom deck configuration makes it difficult for a grower to maximise a single load). It was suggested that this could be overcome by allowing split loads. In the example of an over-height truck, where 8x3x3 bales were used to fill the gap created, this would allow the maximisation of a load without causing overloading.

Government Response:

It is noted that there are different width requirements for round and square bales and therefore a separate permit is required for each. Road safety and vehicle stability are two critical issues surrounding this matter.

A proposal has been put to the Standing Committee on Transport/Transport Agency Chief Executives by the Australian Fodder Industry Association and the National Transport Commission (NTC) which includes:

- 2.7m width
- Permission for certain load restraint methods
- Night travel.

The Government has agreed to conform with policy direction on hay cartage from the NTC, which is managing this matter for all jurisdictions.

8.1.3 Use of B-triples

Issue:

- B-triple routes should be expanded

Industry believes that B-triple vehicles are a more efficient freight carrier and therefore the B-triple route should be expanded, particularly with the impending mining industry boom.

Government Response:

At the May 2007 ATC meeting, Ministers discussed the preliminary map of the national B-triple network and indicated that safety should be given primary consideration in all network decisions. ATC Ministers:

- Endorsed the principle of ensuring the maximum potential network is made available to B-triple combinations while maintaining safety.
- Agreed on a proposed network for B-triple combinations.
- Agreed that governments will consult with industry to identify the need for access beyond the initial B-triple network in the proposed map.

The Government will continue to work with the NTC and industry to further develop the national B-triple network with the aim of expanding it in South Australia (and its links to the interstate B-triple networks) over the next 10 years to meet the needs of industry.

8.1.4 Mutual Recognition across Jurisdictions

Issue:

- Mutual recognition to avoid duplication

Businesses commented that there should be mutual recognition across jurisdictions in relation to permit application forms. As an example, an operator applied for over-mass permits in South Australia, NSW and Queensland to cart mining equipment from South Australia to Queensland. Three separate application forms (one for each State), all requiring similar information, needed to be completed and approval sought before travel.

Government Response:

The matter of a common permit application form is an initiative that would need to be progressed through the NTC.

The Government will continue updating systems to bring about efficiencies and streamline processes for both government and industry, including online application and payments for permits. DTEI will also support efforts to develop a national policy for consideration by ATC Ministers in the latter half of 2008.

8.1.5 *Gazetting Roads*

Issue:

- Local councils impede the process of gazetting roads

Industry highlighted that as the freight task grows, it is imperative that everything practical and possible is done to facilitate maximum use of the most efficient truck configurations, so as to minimise the number of trucks required.

While the recent implementation of the HVAF has been important in helping to improve this situation, its success to date is only considered to be moderate. It is asserted that the key problem has been that, too often, local councils obstruct DTEI in the process of gazetting roads for use by RAVs. Councils' concern that gazettal of a route will lead to an increase in the use of B-doubles is disputed by industry as there is only a given amount of freight and the gazetting of a road does not increase the freight volume nor the number of B-doubles that would be required to handle it. Interviewees recommended that:

- The Commissioner for Highways, or DTEI under delegated authority from the Minister for Transport, should have full authority to determine whether or not to gazette roads for RAVs and that authority should be exercised except where there is a demonstrable reason not to gazette a route. Any such reason should have to be explained in writing.
- DTEI must be provided with increased staff resources to enable it to assess and act to gazette all current long-term permit routes within six months and to assess and determine whether or not any new routes will be gazetted within two months of gazettal being sought by truck operators.

Government Response:

The HVAF sets out State Government policy on heavy vehicle access to the road network in South Australia; a policy developed in close consultation with local government and the transport industry. The HVAF provides for local government to play a key role in certifying the appropriateness of heavy vehicle route access requests in terms of community impact and safety. The HVAF processes streamline the assessment and approval processes and improve the efficiency and cost-effectiveness of the system.

HVAF has been successful with 33 of the regional councils with gazetted networks for both general freight and commodities. The remaining councils are at various stages of negotiation, with the aim of all being on board with some form of gazetted network by the end of September 2008. DTEI is now working with metropolitan councils to search for any RAV permit reductions that can be achieved by gazetting.

The establishment of Authorised Assessors will enable the gazetting of RAV routes to be carried out efficiently and cost-effectively without the need to increase DTEI staffing levels.

The Government will promote the national Performance Based Standards (PBS) project to achieve the most productive combinations on the largest sustainable route network of State Government and council roads. It will continue working with councils to negotiate for any RAV permit reductions that can be achieved by gazette.

8.1.6 Permits and Gazettes**Issue:**

- The volume of permits and gazettes to be carried by truck drivers is substantial

Industry has advised that permits and gazettes are too thick (e.g. Mass Supplementary Notices are 2cm thick). Truck drivers should not have to carry them; just comply with them.

Industry believes that despite the recent improvements through the HVAF and the new web-based map system, there is still far too much paper that has to be carried by truck drivers by default. Motorists do not have to carry the Road Traffic Act and all the Regulations but they do have to comply with them. Industry believes that truck drivers should not have to carry all the Business Rules and other paperwork currently required for RAV operations but they should have to comply with those rules.

Industry says police and DTEI inspectors should all have a copy of those rules, rather than requiring the truck drivers to carry them. Alternatively, only police and DTEI inspectors who have been trained formally in those rules should be authorised to enforce them.

According to industry, the only use actually made of the Business Rules for B-doubles en route is by enforcement officers demanding that the truck driver produce them (and if he/she cannot, then a fine notice is issued).

It has been asserted by industry that there is absolutely no road safety or infrastructure benefit derived from this technical and overly regulatory piece of red tape.

Government Response:

Exemptions or gazettings place various conditions or limitations, which can be unique to the gazetting or permit. There are about 60 different types of common exemptions and a greater number of many types of permits issued to the industry.

Carrying the gazette allows the driver to peruse the conditions imposed and any limitations on the use of the vehicle. It should be noted that some

gazettes, via a code of practice, place different operating conditions on a vehicle dependant on its location.

The conditions on RAV vehicles serve as a safety measure for both the vehicle itself and other road users. The road safety benefit of carrying the gazette or permit is simply that doing so allows the driver to be informed of all conditions and so not unwittingly breach any of these conditions.

Under the RAV Map Project, DTEI is currently rolling out a package including a new gazette, code of practice and individual maps for each RAV. Packages were released for B-doubles in January 2008, for road trains in March and for car carriers in April. Truck trailers will be revised next.

All these new initiatives have reduced and will reduce the amount of paperwork carried in the cab. The operator of a B-double, for example, now only needs to carry the gazette, code of practice and the specific map for the road he is currently on – a major reduction in the number of printed maps.

The Government has agreed to continue to roll out the RAV Map Project to reduce the need for operators to carry large/bulky map books for all RAV routes. Also, DTEI will investigate options for statutory requirements for operators to carry gazettes and will report to the Competitiveness Council by December 2008.

8.1.7 Permit Expiry

Issue:

- Permits should be issued for longer than 12 months

Industry noted that the vast majority of permits are issued annually. It was asserted that there is no operational or regulatory justification for this piece of red tape. 'It only serves to add to DTEI's burden in assessing and issuing the permits and it results in massive backlogs and delays, not to mention some absurd "technical" breaches when DTEI fails, due to its lack of resources in

the permits area, to reissue a permit that has been in operation in many cases for over a decade.'

Industry recommended that permits be issued for five-year periods unless there is a demonstrable and valid reason that a shorter period is required.

Government Response:

DTEI is currently withdrawing permits for general freight RAVs and converting, in agreement with councils, to gazetted networks. This is and will be a significant red tape reduction as it will obviate the need for operators to obtain permits to travel on gazetted routes.

Permits are issued on the basis of clearances issued by councils for travel on council roads and on the basis of a risk assessment conducted by DTEI, having regard to the proposed route, the capability of the pavement to safely carry the proposed RAV combination (and associated vehicle mass) and the geometric standard of a route and its ability to accommodate vehicle turning and other manoeuvres.

Councils cannot issue permits; only the Minister for Transport can under the Road Traffic Act. DTEI negotiates with councils on all aspects to arrive at a mutually acceptable outcome given respective roles and responsibilities.

Permits are issued for durations of one day, one week, one month, 12 months or three years, depending on the risk assessment carried out by DTEI. As a general rule, permits are for the longest period appropriate to the risks associated with the particular route and vehicle combination. Three-year permits are usually issued for situations that are assessed as low risk. Councils issue clearances on the basis of their risk assessment of damage to their local road network and usually only issue annual clearances, which are renewed if the operation of RAVs over the preceding 12 months has not damaged pavements and roadside furniture.

The Government has agreed to:

- Review all permit requirements in 2008/09 and make improvements before the development of an online application and payment system for permits.
- Consider longer permit terms and the potential for automatic renewals by 30 June 2009.
- Continue to roll out the HVAF, which replaces permits with gazetted routes for general freight RAVs.

8.1.8 Permit Renewals

Issue:

- Permit renewals should be sent out automatically

It is suggested that permit holders should receive permit renewals automatically. The best-placed organisation to initiate the renewal process is DTEI. Industry believes there is no reason why DTEI should not and could not issue renewal notices, just as Registration and Licensing does for car registrations.

A truck company with, say, 10 prime movers and 20 B-double A and B trailers has up to 400 combinations of those trailers with the prime movers, and the operator must have a permit for each and every combination for each and every route on which they may be used.

The industry asserted that this results in an absurd level of bureaucracy for what is usually a small family company (10 trucks is not a large concern).

It also was asserted that DTEI's computerised systems ought to be more than capable of providing this service as a means of improving the level of currency of permits and facilitating compliance with the law.

Government Response:

DTEI has introduced the RAV policy, which encompasses the HVAF that replaces permits with gazetted routes for general freight RAVs. As the system rolls out, these classes of vehicle will not require permits.

The Government will review all permit requirements in 2008/09 and introduce improvements before the development of an online application and payment system for permits. It will consider longer permit terms and the potential for automatic renewals by 30 June 2009, and it will continue to roll out the HVAF, which replaces permits with gazetted routes for general freight RAVs.

*8.1.9 Communicating gazetted routes and route map updates***Issue:**

- Gazetting and route map updates must be provided to industry in a timely manner

The review was told that DTEI fails to email the updates out to everyone on the email lists and that if the department commits to providing the service it must deliver reliably. Truck operators are required by law to carry numerous gazettes and route maps in their trucks at all times, and those documents must by law be the current versions or the operator will be found to be in breach of the gazette conditions, 'especially by nit-picking police officers'.

Industry has asserted that:

'Often the changes to a gazette are minor and may relate to the addition of a particular route in a part of the State that the operator does not go to or it may even relate to the addition of a new section of road that the operator does not use but which runs off a main route that the operator does use. This latter example would mean that the operator is required to carry the updated map even though they do not use or intend to use the new section of road, and any failure on their part to print out a map that became available on, say, Monday, will result in an infringement being issued by a police officer during an interception on, say, the Wednesday while the truck is returning from Perth to Adelaide.'

'In these circumstances the operator would have probably not even known about the new map and certainly could not have accessed it while en route anyway. Both Sunday's and Monday's maps are identical in all respects, other than the insertion of the new road section which the operator does not use.

'Nonetheless, they would be booked despite the fact that they had not breached any condition of the gazette other than have Sunday's map instead of Monday's.

The industry described this as an administrative absurdity and patently unjust. It said this situation exists simply because the authorities seem unable to provide the relevant information directly to the police and other inspectors, and so truck drivers are required to carry all documentation. They are exposed to absurd technical breaches that have absolutely nothing to do with risk to safety or infrastructure.

Government Response:

The email service currently used is provided as a free customer service to the industry. Operators subscribe to this service on a form available via the internet, where they indicate which gazettes/codes of practice they require updates on.

The gazette/public notices database relies on operators to regularly maintain their details. In January 2008, DTEI established a process whereby six-monthly reminders are sent to clients to update their details. The DTEI internet site also promotes subscription to the email, fax or post service.

With the rollout of the RAV Map Project, operators will only be required to carry the map of the route they are travelling on.

Drivers are required to carry gazettes to ensure they understand the conditions of access as well as the routes available.

The Government will continue to provide free email, fax and post notifications and six-monthly reminders to operators to update their details, and will continue to roll out the RAV Map Project.

8.1.10 Permit Approval Process

Issue:

- Turn-around time for permits needs to be improved

Industry told the review that while there have been substantial improvements in relation to the processing and turn-around times for new heavy vehicle permits being issued by DTEI, 'the fact remains that far too often permits that are vital for a particular operator simply languish in a large pile and remain unprocessed for far too long'. This was seen as fundamentally an issue of a lack of resources within the permit issuing area of DTEI. It was asserted that this is not generally a matter of unacceptability of permit applications. 'SARTA continually has to try to get the priority attached to particular permit applications elevated but we have to do so knowing that this will result in other permits being delayed. Delays of weeks, let alone months, in issuing permits can mean the loss of contracts for the operator and/or impact heavily on their profit margin, which is an average of just 3%. An expensive piece of capital equipment can not sit idle for one twelfth of the year and still deliver a profit to the investor.'

Government Response:

Currently, 95% of permits are processed within 48 hours, and 75% within 24 hours. Previously, before the Permits Unit was appropriately resourced, permits could have taken up to a week to process.

Operators need to be aware that assessment of a new route can delay the permit process. However, DTEI has established accredited Authorised Route Assessors who can be engaged by industry. These assessors can be found at: www.transport.sa.gov.au/freight/road/vehicle_configuration/index.asp.

A review process, involving industry, will examine all permit requirements in 2008/09 and make improvements before the development of an online application and payments system for permits. As part of this process, consideration will also be given to longer permit terms and potential for renewals.

The Government will continue to update systems to bring about efficiencies and streamline processes for both government and industry. The permit system will be updated in 2008/09 with online application and payment for permits.

8.2 Registration and Licensing

8.2.1 Bus Registration

Issues:

- Purchasing a bus/coach from interstate does not require a South Australian inspection while the vehicle is under current inspection from the State of purchase
- DTEI provides contradictory information to operators

Since 1999, the BCA has held on record a letter from Registration and Licensing, advising that any bus/coach purchased from interstate is not required to undergo a South Australian inspection while under current inspection in the State of purchase. Registration and Licensing counter staff have questioned the validity of the letter. The BCA sought the assistance of DTEI and was provided with the policy number that could be used as a reference to support the validity.

The review was told that an operator experiencing difficulties registering an interstate vehicle did refer to the policy number, and was met with annoyance by DTEI staff, and although the policy did support the operator's position, comment was made that the information was still not acceptable.

It was asserted that incorrect and contradictory information was provided by DTEI and an operator registering an interstate vehicle can spend anything up to and more than six hours to complete the task.

Government Response:

Interstate certificates of inspection are recognised in South Australia in accordance with Section 54(19) (20) of the PTA 1994. The policy may not have been applied evenly by the inspectorial staff. DTEI has provided a letter to the BCA and the Registrar of Motor Vehicles has provided an instruction to Service SA staff, detailing inspection requirements for second-hand interstate buses.

The Government will amend internal manuals to reflect the new arrangements that new and used buses from interstate can be registered in South Australia without a South Australian bus inspection, provided the application can produce a current inspection certificate from interstate.

8.2.2 Registration Process

Issues:

- It is considered easier to register equipment in other States rather than in South Australia
- Upkeep of registrations is a costly process

The review team was advised that registering equipment is easier in other States (e.g. Victoria, NSW and Queensland) than in South Australia.

It was stated that the upkeep of registrations by farmers is a costly process. It was suggested that moving to a simpler bulk registration that applies for a list of registered commercial vehicles within a farm business would streamline paperwork requirements for farmers. This system would be most effective if online and could include a process of giving farmers the option to transfer vehicles 'in and out' of seasonal registration and be operated on a credit system.

Government Response:

Bulk registrations for fleet owners is supported and will be implemented. However, the suggested introduction of a registration scheme to enable farmers to transfer vehicles 'in and out' of seasonal registration cannot be supported. Such a scheme would result in a loss of revenue to the Highways Fund which would need to be recovered by raising registration charges for all vehicle owners. The scheme would also be likely to be complex and difficult to administer.

*8.2.3 Registration Forms***Issues:**

- Registration and renewal forms could be simplified
- Registering vehicles to travel interstate should be made easier

It was stated that registration and renewal forms request tedious and repetitive information. Transferring registration from Federal to State requires the completion of two forms which request information that is believed to have already been captured on the DTEI database.

It was also considered unfair that operators have to register their vehicles in South Australia when only a small percentage of their freight task is for intra-state work. It was suggested that if vehicles were able to be registered under the Federal scheme, thousands of dollars would be saved in stamp duty.

Government Response:

There are up to four applications which require similar vehicle information. These are for registration; for roadworthiness inspection; for vehicle supplement (over 2 tonne) oversize/overweight; and for oversize, width and mass permit. While these application forms require similar information they are all for different transactions. Applications to renew registration are based on information stored on the system and do not require registration information to be repeated. DTEI will review the relevant forms in 2008/09 with the aim of simplifying them, and will expand online services.

In terms of registration under the Federal Interstate Registration Scheme (FIRS), transport operators are able to register vehicles used only for interstate haulage under the Federal scheme and gain the benefit of not paying stamp duty. An issue for industry arises when FIRS-registered operators compete illegally for intra-state freight. Their lower cost base means they compete unfairly with operators who only operate intra-state.

FIRS was introduced to regulate the operations of transport operators who solely carried freight interstate (to address the Constitutional requirement that trade between the States and Territories is free). Operators registered under FIRS who abuse the concessions provided and compete (unfairly) with intra-state operators are guilty of an offence.

The Government has agreed to:

- Review the relevant forms in 2008/09 with the aim of simplifying them, and will expand online services.
- Address the FIRS issue through greater enforcement effort regarding FIRS-registered vehicles.
- Investigate a provision for exceptional circumstances where a locally registered truck is temporarily off the road and a FIRS truck is available.

8.3 Heavy Vehicle Charges Determination

8.3.1 Simplification of the Determination

Issue:

- Confusion over the Heavy Vehicle Charges Determination

Industry has commented that there is a need to simplify and better explain the new Heavy Vehicle Charges Determination, which will have a significant impact on transport operators.

Government Response:

Under the recommended charges option, 25% of heavy vehicles will benefit from a reduction in registration charges; 69% of heavy vehicles will face an

increase of less than 10 per cent; and 6% of the fleet face a greater increase. On average, the vehicle operating costs increase by 2.5% for B-doubles, 1.1% for double road trains and 1.0% for triple road trains. The draft final Determination contains a provision to minimise the impact of cost increases by allowing payment of increased registration fees to be spread over three years. It also changes the cost base used to set charges from the average over the past three years to the average over the past seven years. It also adopts the new category of multi-combination vehicles (covering B-doubles, road trains and B-triples, etc) requested by industry and differential charges for different trailer types.

COAG requires the current methodology for calculating charges to be updated and further research to be undertaken to examine the prospect of moving to more direct, cost-reflective charging arrangements. This work is to be completed by 2010.

The Government will fully explain to industry the new heavy vehicle charges via websites and emails to all affected operators, and hold selected briefings as requested by industry.

8.3.2 Trailer Registration

Issue:

- Trailer registration considered to be expensive

The review team was informed that trailer registration is considered expensive, particularly when trailers may be idle for long periods of time.

Government Response:

The NTC takes account of idle trailers when allocating costs to heavy vehicles. That is, the cost base that charges recover is reduced. Currently, trailer registration is set at \$355 per axle. Therefore, a typical three-axle trailer registration charge is \$1065 per annum. This is cheaper than any of the prime mover charges, cheaper than most rigid truck charges and cheaper than

three-axle bus charges. Trailer charges do not currently recover their full infrastructure costs.

In response to industry concerns, the draft Heavy Vehicle Charges Determination proposes several different charges for trailers in recognition of the different combinations used and their relative contribution to road wear and tear.

Additionally, COAG requires the current methodology for calculating charges to be updated and further research to be undertaken to examine the prospect of moving to more direct, cost-reflective charging arrangements. This work is to be completed by 2010.

The Regulatory Impact Statement (RIS) prepared by the NTC indicates that the trailer charges proposed are fair and equitable – a fact acknowledged by peak heavy vehicle transport associations.

8.3.3 Registration Costs

Issue:

- Registration costs should not be increased

The review team was advised that registration costs for B-doubles should not increase because B-double combinations more than pay their way compared to other combinations. An increase would only be passed down the line to customers and consumers.

Government Response:

The NTC extensively consulted with industry in its preparation of a new draft Heavy Vehicle Charges Determination. The NTC estimated that current heavy vehicle charges (fuel and registration) under-recover their infrastructure costs by about \$168 million in aggregate. COAG requires this under-recovery to be addressed in the new Heavy Vehicle Charges Determination (effective 1 January 2009). The NTC estimated that B-double vehicles currently under-recover their fully allocated costs by 40% or \$16,032 per B-double vehicle.

COAG require that each vehicle type recover, at least, its attributable costs and preferably its fully allocated costs. The NTC estimated the new charges will increase rural/remote grocery bills by 17c in \$100 (0.17%) assuming at an extreme that the B-double vehicle class is the sole transporter of goods.

The Heavy Vehicle Charges Determination, voted on by ATC Ministers in February 2008, contains provision for the operators of B-doubles and road trains to pay the increased registration charges in instalments over a three-year period, to mitigate the impacts of the increased registration charges on those operators without causing under-recovery of costs (which would be contrary to COAG requirements).

8.4 Accreditation

8.4.1 Accreditation System

Issue:

- There should be only one accreditation system

The review team was advised that there should only be one accreditation system for all bus drivers and bus operators which is recognised by all government sectors and accepted as the bus industry accreditation standard for all drivers and operators (e.g. Passenger Transport Division accreditation).

Government Response:

The BCA has expressed concerns in the past that operators must undertake additional requirements, particularly in relation to contracted services, including those with DECS. Accreditation under the Passenger Transport Act (PTA) provides for standards associated with health, fit and proper status (e.g. police clearance) and relevant training. Organisations may impose other contract requirements in addition to PTA accreditation.

DECS 'Approval to Drive a School Bus' requires all drivers to be interviewed by the principal of the school which manages the bus service so the principal can decide whether the driver is suitable to transport students.

At that interview, drivers are expected to present their PTA accreditation and, provided they have this, it is understood that they have had the appropriate medical and police check.

If the applicant wishes to drive a DECS-owned bus (the PTA exempts them and volunteers, including teachers, from holding PTA accreditation) then the driver is required to have a similar interview, present a medical certificate stating they are fit to drive a bus, and have a national police clearance, which is done through DECS.

Regardless of whether a driver has PTA accreditation or not, the driver will still be required to be interviewed by the principal to ascertain their capacity to manage students and to be advised of the school's behaviour management policies.

All operators who have entered into contracts with DECS have signed to say they will adhere to these policies.

While DECS bus drivers and volunteers continue to be exempt from holding PTA accreditation, it is imperative from a child protection point of view for DECS to have an equivalent screening process to ensure the safety of students.

Volunteer driver accreditation provisions have been in place since May 1996. Since then there has been no evidence that would require an increased regulatory requirement for these drivers and the community organisations that utilise their services. The Government does not propose to make any change to the volunteer driver accreditation system currently in force as this is a special initiative to support and recognise the work of this group in our local communities.

Accreditation that is required under the PTA needs to be recognised widely as it is a legislated control on drivers in the passenger transport industry. DTEI can assist the BCA in dealing with other organisations that may unnecessarily

be duplicating the accreditation process as part of contract arrangements to identify whether change is possible.

The Government supports national accreditation review processes and mutual recognition of driver accreditation. It will investigate the introduction of a single bus driver accreditation system for all State Government agencies, including further consultation with DECS.

8.4.2 Adding and deleting vehicles from accreditation records

Issues:

- There is no incentive to notify DTEI of fleet vehicle details
- Fees are charged to add or delete vehicles from the DTEI database

The review team was notified that operators are required to provide details of vehicles contained within their fleet and notify the accreditation section as changes occur. However, each time this occurs a fee is levied. Once an operator has paid their accreditation fee, there should be no other fees payable, as transfer fees have already been paid to the Registration and Licensing section. Some buses may be listed under several operators' accreditation, because operators fail to notify changes, citing the associated costs as the reason for non-compliance.

It is suggested that each accredited vehicle should be issued with an accreditation slip, which is to be returned to the accreditation section with details of the new purchaser within seven days of disposal, at no charge. This system would ensure that the accreditation section maintains accurate records of commercial vehicles operating in South Australia.

Government Response:

Adding and deleting vehicles from accreditation records is an integral part of the accreditation system to ensure that government is aware of all vehicles being used by an accredited operator at any time. This information is

particularly important for ensuring maintenance records and inspections are maintained in conjunction with other registration and insurance requirements. The 'add/delete a vehicle' fee is currently \$16 per transaction and is an administration fee. Given that buses can operate for up to 25 years, this transaction fee is not considered to be a significant financial burden.

Following discussions with the BCA, options that could be considered are to combine the add/delete fee when the vehicle is first added, making the delete process free of charge, or to waive the delete fee. There seems to be no issue with the add vehicle fee process.

Regulation 7(1) (g) Passenger Transport (General) Regulations 1994 requires the accredited person to notify the introduction or withdrawal of a vehicle from service within seven days (maximum fine \$15,000). Under an amendment to the Act currently being considered, it is proposed that this offence will be able to be expiated in future for \$210. The BCA has indicated support for the issue of expiation notices in relation to breaches of the requirement to add/delete a vehicle.

The Government will consider the introduction of a number plate for accredited bus operators, similar in purpose to those already in place for hire cars and taxis, to help identify accredited operators.

8.4.3 Paperwork

Issues:

- Excessive amount of paperwork
- Incentives needed for joining accreditation schemes

The review team was advised that paperwork is considered more than enough when operating a mass and maintenance management-accredited B-double.

It is suggested there should be incentives (e.g. registration benefit) for joining accreditation schemes as there is no commercial benefit for being part of such schemes and there is considerable overlap between them all.

Government Response:

Accreditation schemes are optional. Operators can bid for freight contracts without being accredited. If operators consider accreditation offers no commercial benefit, then non-accreditation would reduce their operating costs. In January 2008, the NTC released a report into accreditation schemes which recommends government and industry work together to improve participation in such schemes. It is likely that NTC will formulate various reform initiatives relating to these schemes for ATC Ministers' consideration.

The RAV Map Project reduces the amount of paperwork required to be carried in the cab by permitting operators to carry only maps which are significant to the journey being undertaken.

Concessions are provided to operators accredited under the National Heavy Vehicle Accreditation Scheme (NHVAS) for maintenance management, that is, they are not required to undergo annual vehicle inspections. Accreditation also yields longer-term commercial benefits to industry through better vehicle maintenance and operation and lower compliance and enforcement costs.

8.4.4 NHVAS Mass Management Scheme

Issue:

- Unnecessary requirements are placed on SA transport operators under the NHVAS Mass Management Scheme

It was stated that the requirement under the NHVAS Mass Management Scheme in South Australia, to identify and specify in writing the route to be used before a journey, is unique to the South Australian scheme. No other State requires this. It is seen as an unnecessary burden which restricts flexibility of the operators and driver on the day.

While agreeing that trucks operating under the scheme must at all times remain on approved mass management routes, the industry asserted that requiring the driver to specify the route(s) in advance achieves nothing other than to provide yet another opportunity for some enforcement officers to issue

an Infringement notice if for some reason the driver either fails to record the route in advance or deviates from it. 'All that should matter is that the driver remains on approved mass management routes when operating under the scheme.'

The review team was told that the initial intention of this now outdated requirement was to try to force drivers to find out where the routes are and, even if that was ever an effective approach, its time and effectiveness have long gone.

Industry recommended that this unique South Australian requirement should be abolished.

Government Response:

South Australia was the first State to introduce the national initiative of Higher Mass Limits (HML) for the benefit of the transport industry. The DTEI Route Compliance Certificate was developed in negotiation with councils to provide assurance that RAV operators were aware of what council roads they could use and their obligations under the terms and conditions of the permits issued or the relevant gazette notice (for gazetted routes).

Councils have advised DTEI that they would be unwilling to continue to issue clearances if the requirement for Route Compliance Certificates was abolished by DTEI. As an alternative, the Government is proposing to follow the lead of NSW and Queensland and implement the Intelligent Access Program (IAP) in South Australia to enable vehicle route compliance in terms of location and speed to be continuously monitored by satellite for vehicles fitted with the necessary telematics equipment. Operation under IAP will obviate the need for operators to complete Route Compliance Certificates. Other States such as NSW and Queensland are mandating IAP for new HML applications.

The Government will implement Stage 2 of the IAP by 30 June 2009 to continuously and remotely monitor the location and speed of general freight

RAVs, low loaders, mobile cranes and PBS-accredited vehicle combinations so the need for Route Compliance Certificates can be gradually phased out from September 2008.

The Government will continue to work with local government to minimise the compliance burden for non-IAP operators.

8.5 Inspections

8.5.1 Mandatory Bus Inspections

Issue:

- Repetitive information is asked of operators each time a mandatory bus inspection is booked

The review team was informed that each time an operator books in a mandatory bus inspection, the same vehicle information is requested. It was suggested that the booking and scheduling system should record all these details, including which vehicles are due for inspections as a result of the mandatory inspection regulations.

Government Response:

DTEI has initiated a project to review the bus inspection process, including the booking system. The BCA is fully engaged in this process. The online booking system, which is currently being trialled, will allow clients to make inspection bookings at their convenience and pay inspection fees online.

This new system will be synchronised with the TRUMPS database, and make details available about the vehicle at the time of booking. The service will also improve the recording of inspection results.

8.5.2 Vehicle Inspectors

Issues:

- There is a critical shortage of vehicle inspectors
- There are significant inspection delays

The review team was advised that there is a critical shortage of vehicle inspectors which results in significant inspection delays (ID and roadworthy) of up to four weeks. Any delays should be no longer than 10 working days. It was stated that regional operators can wait a long time for inspectors to visit and, to combat this, it was suggested that local mechanics could conduct inspections on behalf of DTEI.

It was suggested that the requirement to inspect brand new heavy vehicles and trailers (including interstate-purchased equipment) should be removed as so much time and money is lost waiting for the inspection to be undertaken before they can be used. Industry recommended that:

- Brand new heavy vehicle equipment should not have to be inspected by DTEI before it is registered.
- Truck equipment suppliers should be required to provide equipment that is fit for purpose and be held responsible for any failure to do so.

'So much time and money is wasted waiting for inspections of vehicles when they should not have been defected in the first place,' the review team was told. 'It is felt that SAPOL officers should not be able to defect heavy vehicles without adequate training.'

Government Response:

Vehicle inspection delays

DTEI is striving to improve vehicle inspection service delivery and, in particular, to reduce waiting times. Recent changes have reduced waiting times to not more than 10 working days at the Regency Park facility, and enabled allocation of more resources to regional inspection programs to meet growing service requests.

New vehicle inspections

It is a legislative requirement for all federally registered heavy vehicles, all new RAVs, and all buses to be inspected. If the requirement to inspect brand

new vehicles under State legislation was removed, federally registered vehicles would still be subject to these inspections.

Business systems in DTEI have been modernised to formally recognise the validity of interstate inspections of new heavy vehicles, thereby removing the need for further inspections. However, where it is believed the vehicle has been significantly altered since the interstate inspection was carried out, re-inspection will be required.

SAPOL defecting of vehicles

The police officers' focus is to identify any obvious, significant safety-related deficiencies in the vehicle they are examining. Police officers do not have the appropriate testing equipment to conduct complete vehicle roadworthiness inspections and generally identify the most obvious significant deficiencies that are apparent under the circumstances. Currently, waiting times for light and heavy vehicle defect clearance inspections are under two weeks.

Government departments are discussing changes to the guidelines and instructions issued to operational officers regarding the classification of defects so that only major defects that pose serious safety risks are referred to DTEI for inspection. DTEI has redrafted the instructions for consideration by SAPOL.

The Government has agreed to recruit additional vehicle inspectors to keep metropolitan bus inspection waiting times below two weeks.

It also has agreed to review the requirement to inspect brand new heavy vehicles/trailers with a view to identifying suitable local and interstate assessors and accredited vehicle dealers who can issue compliance certificates, thereby obviating the need for further inspections by DTEI inspectors.

8.5.3 Departmental requirements

Issue:

- Compliance duplication between State Government departments

It was stated that DECS-contracted bus operators have to comply with DTEI mandatory inspection regulations and that they can also be required to submit to random inspections by DECS. It was suggested that to eliminate duplication, the two inspections should be incorporated into one.

Government Response:

There are many examples where DECS School Bus Examiners have inspected contract school buses between DTEI inspections and found these buses to be operating in an unsafe condition. DECS therefore believes that additional inspections are warranted.

Contracted school buses are inspected once a year by DECS School Bus Examiners, however, if a bus has been inspected by DTEI in the previous month then the inspection is cursory only and not the full inspection that would normally be undertaken.

When School Bus Examiners are in an area inspecting a DECS bus, they may call in and inspect a contract bus at the same time. While these visits are 'random audits', they are generally preceded by a phone call to ascertain the availability of the vehicle/s.

There is no cost to the operator for these inspections and the School Bus Examiners will always work around the operators' other work (i.e. they do not insist that a bus forgo a charter because they are there to inspect it).

8.5.4 Designated Areas

Issue:

- For safety reasons, designated 'pull over' areas on roads are needed for authorities to safely inspect vehicles

The review team was informed that designated areas and times should be established to give authorities (SAPOL/DTEI) the ability to safely pull heavy vehicles over to the side of the road to check paperwork, weights, lengths etc. without endangering other road users. 'These random on-road inspections hold up vehicles and cost the operator time and money with no compensation.'

Government Response:

DTEI's on-road Transport Safety Compliance Officers (TSCOs) are encouraged to target their attention on the small percentage of non-compliant operators. However, in order to determine who are compliant and who are not, particularly at weighbridges where there is a time cost to all heavy vehicle operators, there is a need to screen all heavy vehicle traffic. Generally speaking, compliant operators are passed through weighbridges quickly. Where heavy vehicle traffic is beginning to build up, operational policy dictates that heavy vehicles will be directed to move on through the weigh station, forgoing inspection.

TSCOs are subject to operational guidelines which include the safe operations relevant to roadside inspections of heavy vehicles.

Weighbridge facilities are being upgraded to ensure increased operational safety. Works have been completed at Blanchetown, Monteith and Mt Gambier. Work to rebuild a weighbridge is under way at Port Augusta, while other works are in the planning phase.

The proposal to restrict enforcement response to designated areas and times is not supported. Roadside audits conducted by police regularly disclose road safety and criminal activities involving persons employed within the heavy transport sector. Enforcement activity is more effective when random. SAPOL has set the benchmark in relation to the analysis of intelligence to determine and deliver targeted road safety-related enforcement.

The Government will develop technologically enhanced inspection stations in order to minimise time lost by compliant heavy vehicle operators (i.e. weigh-in-motion technology).

8.5.5 Interstate inspections of new equipment

Issue:

- South Australia should accept interstate inspections of new equipment

It was suggested that South Australia should accept interstate inspections of new equipment. Industry argued:

'So long as new equipment such as heavy vehicle trailers have to be inspected, any inspections done interstate should be accepted in South Australia without the need for an inspection in South Australia, particularly where the interstate inspections are accepted by the respective interstate government. South Australia cannot on the one hand continue to claim that national uniformity is paramount and then on the other hand choose to ignore valid inspections performed interstate on new equipment that is then registered for use in South Australia. The current approach serves only to delay unnecessarily the availability of new equipment for use in South Australia, due to the often lengthy delays in securing an inspection timeslot. It does not in any way improve road safety and DTEI and the police could not possibly argue that the inspections are necessary because, if they were, then no interstate-registered heavy vehicle should ever be allowed to operate in or through this State for safety reasons. This is an outdated policy of protecting empires and insisting on operating as if the State were an island, without any reference to the reality.'

Government Response:

It is a legislative requirement for all federally registered heavy vehicles, all new RAVs, and all buses to be inspected. If the requirement to inspect brand new vehicles under State legislation were removed, federally registered vehicles would still be subject to these inspections.

Business systems in DTEI have been modernised to formally recognise the validity of interstate inspections of new heavy vehicles, thereby eliminating the need for further inspections. However, where it is believed the vehicle has been significantly altered since the interstate inspection was carried out, re-inspection will be required.

The Government has agreed to complete a review of the requirement to inspect new heavy vehicles/trailers by the end of 2008.

8.5.6 Full inspections by DTEI

Issue:

- The need for full inspections at DTEI inspection facilities should be minimised

The review team was told that the requirement to have full inspections at Regency Park must be minimised and not used as freely as it is, especially by the general duties police.

It was asserted that, far too often, general duties police officers issue an infringement notice or defect notice and select the option requiring a full inspection of the vehicle at one of DTEI's overworked inspection facilities. It was asserted that this is either because they do not understand the technical aspects of the trucks and the Australian Design Rules that govern truck design or because they simply do not want their colleague police officers at any given police station to have to deal with what should generally be a simple and minor inspection to ensure the fault has been corrected.

Industry said that this is clearly an established policy within SAPOL and is both inappropriate and, more importantly, unnecessary and imposes great cost on the trucking industry and hence all the industries that it serves. It was asserted that this also results in a substantial and unnecessary additional workload for DTEI's very limited inspection facilities.

Government Response:

Defected heavy vehicles account for 4% (approximately 680 heavy vehicle defect inspections a year) of all DTEI's inspection workload.

The police officers' focus is to identify any obvious, significant safety-related deficiencies in the vehicle they are examining. SAPOL officers do not have the appropriate testing equipment to conduct complete vehicle roadworthiness inspections and generally identify the most obvious significant deficiencies that are apparent under the circumstances. Currently, waiting times for light and heavy vehicle defect clearance inspections are under two weeks.

The question of what action is appropriate (whether a defect is to be produced for examination at a police station or a DTEI inspection facility) is printed as a guide for enforcement officers upon the written advice within the SAPOL defect notice book identified as form PD116. This emanates from an agreed process (reviewed as necessary) between DTEI and SAPOL.

Government departments are discussing changes to the guidelines and instructions issued to operational officers regarding the classification of defects so that only major defects that pose serious safety risks are referred to DTEI for inspection. DTEI has redrafted the instructions for consideration by SAPOL.

8.6 Compliance and Enforcement (C&E)

8.6.1 Complying with policies

Issues:

- Clarification is needed for the new vision to the rear policy
- High costs are associated with compliance

Industry has commented that a documented framework of guidelines should be developed which clearly outline the requirements of heavy vehicle transport operators in relation to the new compliance and enforcement laws, including the new vision to the rear policy.

It was asserted that high costs are associated with compliance (e.g. PBS and IAP).

The review team was told that the legislation is considered to be stringent and that it will force everyone to comply. It was recommended that inspectors must check for compliance to eliminate 'cowboy operators'.

Government Response:

C&E guidelines

The focus on the new compliance and enforcement legislation is to significantly improve road safety and engender a culture of compliance within the heavy vehicle transport industry in line with the COAG national transport reform agenda. DTEI has worked directly with industry in distributing a DVD that serves both as an awareness and training tool, and conducting at least 25 information sessions throughout regional and metropolitan South Australia, before implementation and ongoing follow-up sessions. Fact sheets are also available on DTEI's website and as hard copy sets, providing simple and clear guidance for each party in the transport logistics chain.

Further information on the compliance and enforcement legislation is available by telephone on 1300 799 955 or from the website:

www.transport.sa.gov.au/saferfairer/enforcement_legislation.asp.

Vision to the rear

The vision to the rear requirement has been prescribed under the Road Traffic Act 1961 for many years. Enforcement of this requirement is subject to police officers' assessment of rear and side vision capabilities. The 'vision to the rear' policy requires that a transport operator employ a rear pilot vehicle when moving a load where they cannot clearly see any vehicles behind their vehicle (because of the size of the load being carried).

Compliance costs

Both PBS and IAP provide transport operators with the ability to achieve maximum productivity from the heavy vehicle combinations they use, coupled

with adoption of NHVAS and IAP to govern network access. Both measures stand as good examples of national uniformity in regulatory reform, and work by the NTC indicates that industry will quickly recover the initial outlays in improved productivity and efficiency.

The Government will:

- Continue to conduct information sessions on compliance and enforcement laws as required.
- Continue its communication and education strategy in partnership with the SARTA regarding the compliance and enforcement legislation, along with the new HDVF and heavy vehicle speeding legislation.
- Target enforcement efforts based on qualified intelligence information and outcomes of heavy vehicle enforcement operations.

8.6.2 Transport Security Initiatives

Issue:

- Costs and inefficiencies associated with transport security

It was asserted that costs and inefficiencies associated with transport security initiatives are impacting on all modes of transport and logistics activities. For example, the requirement for a Maritime Security Identification Card for truck drivers needing to access a wharf area, and the failure to recognise transport security as a national objective, result in the transport and logistics sector and, ultimately, customer/ industry paying directly for national security initiatives).

Government Response:

The need for improved transport security regimes is a national policy and also has implications for international trade where countries such as the United States will not accept freight from countries where there is any doubt about the transport security measures adopted.

The Government will support efforts to develop cost-effective transport security regimes as part of COAG's national transport reform agenda.

8.6.3 Logbook Records

Issue:

- Inflexibility of log book record keeping is a compliance issue

The review team was advised that the inflexibility of log book record keeping is a compliance issue for farmers, particularly given that most are not regular operators of heavy vehicles and therefore do not establish a routine of completing log books. It was pointed out that there is a lack of leniency for slight inaccuracies in record keeping.

It has been suggested that log books should also act as pay sheets, however it is believed that SafeWork SA will not agree to the log book as it is not a registered document.

Government Response:

Operators are not required to keep log books when travel is within 100km of their depot. This provision covers most farmers who operate within a 100km radius of their properties. Only long-distance transport operators are required to keep log books as evidence of compliance with road transport law.

Some plants that could be used on farms and mines, such as certain load shifting equipment, are regulated under the OHS&W Act but log books are not required for those purposes. The OHS&W records required relate to maintenance and training of operators but these apply only to certain defined load shifting equipment and do not relate to vehicle hours or driving time etc.

Certain general provisions of the Fair Work Act 1994 apply to employment under the State system. A log book of vehicle hours is unlikely to be able to cover the legitimate basic requirements to enable compliance with awards to be verified.

The Government has agreed to examine the business case for adoption in South Australia of electronic log books or digital tachographs (based on smart

card technology) as a safety, fatigue management and compliance mechanism (this is currently being examined by the ATC).

8.6.4 Governance of the heavy vehicle industry

Issue:

- The industry is considered to be over-governed

The review team was told that the heavy vehicle industry is regarded as over-governed because DTEI, the Environment Protection Agency, SafeWork SA and SAPOL are all enforcement agencies. It is felt, however, that they do not communicate with each other and that, for consistency, a single agency should handle all parts of the industry.

The HVAF is considered to generate more red tape for local government authorities (e.g. identifying commodity routes, negotiating with road operators etc).

Government Response:

It is not feasible for one agency to handle all aspects of the governance arrangements covering transport because each operates under its own legislative mandate and does not have the jurisdiction over compliance issues in others.

There is a South Australia Law Enforcement Group (SALEG) that includes representatives from SAPOL, DTEI, the Transport Worker' Union and SafeWork SA. Chaired by the SARTA, this group discusses heavy vehicle enforcement matters in working towards consistency in enforcement throughout the State.

Feedback received from councils throughout South Australia is that the HVAF has in fact led to a reduction in red tape and streamlined the administrative processes associated with granting heavy vehicle access to the local road network.

The Government has agreed to gazette general freight, commodity and permit routes in line with the HVAF to eliminate the need for operators to obtain clearances from councils, as well as removing delays and administrative burdens on councils and operators.

The Government will continue to work with SALEG to ensure enforcement of heavy vehicle laws is consistent.

8.6.5 Defecting heavy vehicles

Issue:

- Some SAPOL officers have inadequate knowledge in defecting heavy vehicles

The review team heard that there are issues with SAPOL officers not having adequate knowledge in defecting heavy vehicles. It was asserted that when DTEI inspects defected vehicles, it can find other defects, which further delay an operator regaining use of the vehicle.

It has been reported that one officer issued a driver with a fine for not being able to prove the weight of a load (container weight declaration). It was thought that common sense should have prevailed, however the driver was fined \$520.

It is recommended by industry that only police who have qualified through the SAPOL heavy vehicle inspectors' course should be authorised to issue heavy vehicle defects.

Government Response:

SAPOL officers do not have all the appropriate testing equipment, nor do they inspect the vehicles in the most suitable locations, and it is not their role to conduct complete vehicle roadworthiness inspections. They generally identify the most obvious and significant deficiencies that are apparent under the circumstances.

All operational police retain responsibility for road safety and enforcement, irrespective of vehicle categorisation. This supports the SAPOL Road Safety Strategy 2006-2010: 'Road safety is everyone's responsibility – police, road users and the community'. SAPOL provides training appropriate for and relevant to the various roles and responsibilities within the organisation. Advanced training is provided to police specialising in traffic enforcement, including heavy vehicle inspection techniques. Supervisory support is available for all police. SAPOL maintains a Heavy Vehicle Enforcement Group specialising in heavy transport sector issues, to provide assistance and consultation, including for other police. Police are highly accountable for their actions and any allegations of inappropriate police procedures are investigated and complainants informed of any determination.

The Government will continue to work with SAPOL to ensure that only major defects that pose serious safety risks are referred to DTEI for inspection.

8.6.6 Load Restraint Guide

Issue:

- Inconsistencies in interpretation of the guide

Business operators have highlighted inconsistencies and anomalies in interpretation of the Load Restraint Guide (e.g. how to restrain a 21-tonne block of granite and plastic-wrapped plastic drink bottles).

Government Response:

The Road Traffic (Mass and Loading Requirements) Regulations 1999 require an appropriate method of restraint to be used to restrain any load on a vehicle. This does not limit the methods of restraint that can be utilised, but it does require that the load is placed, secured or restrained (as the case requires) in a way that meets the performance standards recommended in the *Load Restraint Guide* (the guide) published by the Australian Government Publishing Service. Other restraint methods not included in the guide must be properly tested and certified, as set out in Section I of the guide, by a Chartered Professional Engineer or other person acceptable to DTEI.

The guide was developed by the NTC together with road transport agencies, police agencies, the Australian Trucking Association and the Transport Workers Union (TWU).

The NTC has advised that this edition of the guide (2004) is still relevant and does not require revision in the near future.

The Government will continue working with the transport industry to maintain safety on South Australian roads, and will talk to industry representative groups, individual companies and drivers about how to comply with road laws.

8.6.7 *Safe-T-Cam*

Issue:

- Compliance with Safe-T-Cam is onerous

It was asserted that information required for Safe-T-Cam is onerous and results in operators having to chase up log book information and times etc. States should co-operate to alleviate these problems.

Government Response:

It is a legal requirement for operators/drivers to maintain records and to be able to produce them when required. DTEI posts out Notice to Produce letters when breaches of Road Transport (Driving Hours) Regulation 1999 are identified through Safe-T-Cam.

DTEI and the New South Wales Road Traffic Authority (NSW RTA) are aware there are operators/drivers who operate in either two-up or changeover operations. When DTEI has confirmed from the records produced by an operator that the operator is acting legally using a two-up or changeover configuration, a letter is then sent to this operator only on a random basis for audit purposes. If an offence is detected, then DTEI reinstates the process of sending letters for all potential incidents until it can ensure the operator is again operating in a compliant manner. Over recent months, DTEI and the

NSW RTA have resolved to reduce the number of letters sent to operators/drivers operating in the abovementioned configurations.

As a result of the above, the number of letters being sent to compliant operators/drivers has reduced significantly. Unfortunately, DTEI is not able to advise operators of driver indiscretions due to privacy principles.

DTEI and the NSW RTA recently installed the Vehicle Regulation Exchange system (VREX) which eliminates the possibility of both agencies requesting information from an operator or driver for the same offence.

South Australian Government agencies will continue to work with NSW Government agencies to develop systems to reduce the number of letters sent unnecessarily.

DTEI will seek to identify timeframes for legitimate trips using previous Safe-T-Cam data and other collated internal intelligence.

8.6.8 Tolerance

Issue:

- Tolerance levels are considered too restrictive.

The review team was advised that tolerance is considered too tight (e.g. an operator was booked for a minor breach for being one tonne overweight while pulling a broken-down truck back to the depot).

Government Response:

The move toward nationally agreed legislation was to prevent the inconsistent application of law by operational compliance and policing staff.

As part of the C&E reforms, new Austroads Measurement Adjustments (MA) for mass breaches were introduced nationally on 1 July 2006, replacing the NAASRA tolerances developed during the 1980s.

The application of MA provides legal certainty for the assessment of mass. MA account for any potential inaccuracies in measuring equipment, differences in site characteristics, different measuring methods and the conditions under which the measurements are made. MA ensures all these factors are taken into account before determining whether an offence has been committed.

The C&E legislation provides drivers and operators, for the first time, with access to a defence if they have taken all reasonable steps to prevent a mass, dimension or load restraint breach and the breach is only of minor risk.

Therefore, if drivers and operators are able to present evidence that demonstrates they have taken all reasonable steps to prevent overloading, they will not be liable for a minor risk breach.

The Government will continue actively working with the transport industry to maintain safety on South Australian roads, and talk to industry representative groups, individual companies and drivers about how to comply with road laws.

8.6.9 Overload

Issue:

- Fear among farmers of being overloaded, resulting in penalties

It was noted that farmers are being overly cautious about being overloaded, so they keep well under the statutory limit (1-4 tonnes underweight) to avoid fines.

Government Response:

DTEI, together with SAPOL, works extensively with industry, including the SARTA and the SAFF, in the lead-up to each grain and grape season in South Australia. In 2007, DTEI officers liaised with transport companies, farmers and grain storage organisations to try to help them understand their responsibility under the C&E legislation.

DTEI and SAPOL appreciate the challenges faced by farmers when loading grain from paddocks. On-road enforcement during the grain harvest period includes the continued application of the current red card system with respect to mass loading offences by grain carriers.

Farmers are encouraged to maintain records of initial loads and, if a load is found to be overmass when unloaded by grain receivers, ensure appropriate adjustments are made and documented with subsequent loads. Enforcement officers will use discretion and will assist those operators who are genuinely attempting to meet their responsibilities under the compliance and enforcement legislation.

DTEI staff are available to talk to industry representative groups, individual companies and drivers about how to comply with road laws during the harvest season.

The Government has agreed to assist farmers within legislative guidelines where it can; for example, through the Grain Harvest Strategy (an enforcement strategy used by DTEI and SAPOL throughout the harvest period). It will also continue to develop and implement Grain Harvest Strategies, and use discretion in the enforcement of minor breaches and the red card system.

8.6.10 Route Compliance Sheets

Issue:

- Duplicate information is requested

The review team was advised that Route Compliance Sheets are used in whichever State an operator/driver is registered. Duplicate information which is already on the consignment note (e.g. axle weights) is requested.

Government Response:

Route Compliance Certificates are not used in any other jurisdiction than South Australia, where it is a legal requirement. The certificate is a declaration signed by the operator, which nominates the routes they plan to use and states that they are approved routes. These certificates can then be audited by DTEI within a 12-month period.

Operators in South Australia have had access to the largest HML route network in Australia, which commenced 10 years ago. Until recently, NSW had only one road (now, with the advent of IAP, the NSW network will begin to expand), Queensland has a lesser network than South Australia and Victoria now has a fairly expansive network.

Removal of the requirement for a route compliance certificate will result in a higher risk of infrastructure damage. Alternatively, the red tape burden will be significantly reduced as more and more transport operators opt to join the IAP. This involves vehicles being fitted with telematics that allow the speed and location of vehicles to be tracked via satellite along gazetted routes. IAP is a mandatory requirement in NSW and Queensland for access to the HML network and its adoption by operators in South Australia (who travel to and from NSW and Queensland) is expected to increase over the period to January 2009. Operating under IAP will eliminate the need for paper-based compliance certificates.

The Government will encourage transport operators to voluntarily participate in the Stage 2 implementation of the IAP (which will negate the need for a route compliance certificate) thereby eliminating the need for paper-based records and compliance certificates. This will also benefit South Australian operators who operate within NSW and Queensland, where participation in the IAP will be mandatory from the middle of 2009.

8.6.11 NHVAS Maintenance Management Scheme

Issue:

- Minor defects should be able to be cleared under the NHVAS scheme

It was suggested that minor faults should be able to be cleared by operators who are accredited under the NHVAS Maintenance Management Scheme on the basis that most defects happen when the truck is en route. Accredited operators are required to have an inspection regime in place; and in practice they detect and correct the vast majority of vehicle technical issues without the authorities being involved.

The review team heard that the original intent of the scheme was to facilitate and encourage this approach, and part of the scheme has always been that minor issues identified on the road are able to be managed by the operators within their internal systems under the accreditation program.

It was asserted that, too often, enforcement officers (and particularly police) refuse to acknowledge this, mainly because of their inadequate training, and they issue formal defect notices that require the operator to present the truck to a DTEI inspection facility. It was said that these facilities are overworked and this requirement often causes significant delays as it can be four to six weeks before a truck can be booked into a DTEI facility.

Industry recommended that:

- The referral of trucks to the DTEI inspection facilities should be strictly limited to cases involving a major safety risk.
- The DTEI inspection facilities should be supplemented by outsourced private sector inspection facilities to provide greater capacity (to reduce delays) and to provide greater coverage across the State.
- Operators accredited under the NHVAS Maintenance Management Scheme should be authorised to clear, and record, the minor (non-critical) defects on their trucks and be subject to checks and audits of this. If such a defect is discovered on the road during a subsequent roadside routine intervention, without having been corrected, the

operator would have to be able to show that the defect is scheduled for attention at an upcoming service.

Government Response:

As identified, the intent of the alternative compliance scheme was to ensure that faults recorded in the fault recording register during the journey would be repaired at a time nominated by the person authorised to make that decision or to defer the repair. However, failure to record these faults by the driver during the journey has resulted in minor defect notices being issued by enforcement personnel.

Where a minor defect is issued it can be cleared at a police station. For major defect notices (which relate to safety breaches) to be cleared, the vehicle must be presented to a DTEI inspection station, with a current waiting time of two weeks.

If a defect notice has been issued, the Road Traffic Act 1961 requires it to be cleared by an authorised officer. DTEI inspection facilities offer inspections within 10 working days. Defected heavy vehicles account for 4% of all DTEI's inspection workload. It is not current Government policy to outsource vehicle inspections.

The Government will consider allowing operators who are accredited under the NHVAS Maintenance Management Scheme to clear minor defects as they are subject to audit under the terms of their NHVAS accreditation.

8.6.12 New heavy vehicle configurations

Issue:

- Processing and cost of approval of new heavy vehicle configuration inhibits innovation.

It was asserted that a key innovation inhibitor on the trucking industry is the process and cost of approval of new heavy vehicle configurations. The new system for achieving this is the PBS scheme, under which any proposed new

configuration design must be assessed against set performance standards. SARTA supports the concept but in practice the costs involved in securing the engineering assessments and reports put the development and implementation of a new concept largely out of the reach of all small to medium operators (about 70%-plus of the industry). Many of the proposals are of broad application and would greatly facilitate the safer and more efficient handling of the growing freight tasks, such as 19m B-doubles operating at statutory mass.

Industry recommended that:

- As a matter of principle, DTEI should play the central role of assessing and facilitating implementation of broad-application new designs and concepts, principally as a means of facilitating the handling of the growing freight task in the best interests of the community and the economy.
- A road freight productivity reference group should be established to facilitate the identification and processing of new concepts and designs assessed to be of broad application.

Government Response:

The ATC adopted PBS as the means of fostering innovation in heavy vehicle design and configuration leading to improvements in productivity and road safety. All jurisdictions through ATC have reaffirmed their commitment to PBS with the establishment and resourcing of the PBS Review Panel to assess proposals from the trucking industry and vehicle manufacturers. DTEI representation on the review panel ensures that it facilitates the development and introduction of innovative, higher-productivity heavy vehicles suitable to meet the challenges posed by the burgeoning freight task.

The issues raised by SARTA are really matters for vehicle manufacturers in the first instance, since it is in their best interests to obtain PBS certification before selling vehicles to operators and it is in the best interests of operators to demand evidence of PBS certification before they purchase vehicles.

It is not appropriate for DTEI to participate in commercial negotiations between transport operators and vehicle manufacturers because of its role on the PBS Review Panel and its regulatory role generally.

8.6.13 Driving hours laws

Issue:

- Concern that general duties police officers will not be up to date with new driving hours laws when they are implemented in September 2008.

The review team was advised that new and important driving hours laws will be introduced in South Australia in late September 2008 and the industry and SARTA fully support them. SARTA has fought hard to make them happen and to try to strike the right balance. These new laws move the industry from a relatively simple but inflexible driving hours regime to a far more complex regime that offers some increased flexibility.

These laws, like the mass/dimension and load restraint (MDL) provisions that commenced in May 2007, will come under the new C&E umbrella legislation and, as such, they will place a reverse onus of proof on truck operators, drivers, consignors and all other parties. This means that if a breach or suspected breach occurs, the relevant parties are treated as guilty unless they can prove their innocence through a reasonable steps defence. SARTA fully supports this concept. Industry is concerned that under the MDL C&E laws most general duties police officers will have little or no detailed knowledge or understanding of the new laws, yet they will readily issue infringement notices.

Industry is concerned that defending these notices, because of the reverse onus of proof, even where the operator clearly has a valid reasonable steps defence, will be a very expensive and long process, and so it is absolutely imperative that the Government ensures that all police officers are properly trained so they:

- Fully understand the details and intent of the new driving hours laws.
- Enforce these laws in a practical and consistent manner that focuses on the intention of improving safety, and not just mindlessly adopt the

approach of booking the driver/operator and leaving it to them to 'sort it out in court' because the police no longer have to prove their case.

Industry asserts that the complexities and technicalities of the new laws are such that most police officers will struggle to understand them properly (even people such as the officials and industry representatives who have actively participated in developing the laws often disagree about their interpretation) and so they will often just take the easy option of using the reverse onus of proof provisions to 'dump it in the lap of the truck driver/operator'. It is asserted that the solution (which must be implemented) is to ensure that:

- Very comprehensive training on the new laws is provided to enforcement officers.
- Only trained and qualified enforcement officers are able to enforce the new C&E driving hours offence provisions.

Government Response:

The Government is committed to achieving a consistent enforcement approach to the application of new HVDF laws. Agencies including DTEI and SafeWork SA will work closely on all operational aspects, such as training, procedural matters, form development and information sharing/exchange throughout implementation.

Operational police will receive appropriate competency-based training to address legislative and procedural implications to deliver best practice policing services, including mandatory training specific to the proposed heavy vehicle driving hours reforms.

The Government has agreed to establish a working party including representatives from SAPOL and SafeWork SA to consider and act on a number of key tasks associated with the implementation of this new legislation, particularly training requirements.

SAPOL will provide advanced training for selected police identified within specific areas; and DTEI personnel will participate in training opportunities provided at both metropolitan and country locations.

8.7 Heavy Vehicle Fatigue Management

Issue:

- Fatigue management reforms are considered burdensome

The new fatigue management reforms are considered to be burdensome on industry. As a result, a long lead time for compliance is recommended.

Government Response:

The HVDF reforms involve changes to current driving hours, including new options for managing work and rest. The reforms have been developed in conjunction with industry, business, unions and health experts to address what is a, if not the, major occupational risk within the transport sector. It is not about introducing more red tape, but a sensible approach to addressing what is a major cause of accidents involving heavy vehicles; and it changes the focus from regulating driving hours to managing fatigue under arrangements that complement existing OHS&W law.

A detailed RIS prepared by the NTC concluded that full compliance with the HVDF proposal would result in significant economic benefits to industry and the broader community. It anticipated potential annual benefits of \$318 million nationally, comprised of:

- \$307 million a year in reduced numbers of fatigue-related crashes.
- \$11 million a year in reduced OHS&W incident costs.

While recognising that full compliance is difficult to achieve, the national annual benefits of the proposal will still outweigh the anticipated costs. Specific potential savings for industry identified in the RIS include:

- Improved working conditions and reduced risk of death and injury to drivers.

- Increased certainty for industry resulting from a more consistent national approach to fatigue management.
- Potential for reduced insurance costs as a result of recognition of this initiative by the insurance industry.

States and Territories (other than Western Australia and the ACT) have agreed on a common implementation date for HVDF reforms. The original implementation date was February 2008, but this has been postponed to 29 September 2008 (subject to ATC approval) to give all affected parties additional lead time.

The Government has agreed that SAPOL and DTEI should allow a reasonable time for education and adjustment to their approach to enforcement when HVDF national reforms come into operation.

South Australia will work with industry directly and through key organisations to implement an HVDF communications strategy, including establishing an Industry Reference Group, holding metropolitan and regional information sessions, establishing a dedicated HVDF hotline and email address, provision of a national implementation kit and associated online resources, and use of targeted advertising through industry organisations and outlets including transport depots and truck stops.

8.8 Inconsistencies Between State Jurisdictions

8.8.1 Road transport regulation and permits

Issue:

- There are too many road transport regulation differences between States.

It was asserted that the industry needs a consistent national approach to road transport regulation and permits, particularly during grain harvest. Communication needs to be improved and internal training conducted within DTEI and SAPOL to minimise these inconsistencies (e.g. heavy vehicle speed limit is 90km/h in South Australia and 100km/h in Western Australia).

Government Response:

The need for national uniformity and harmonisation of regulatory regimes was recognised 10 years ago and the NTC was established to help the ACT rectify this. South Australia, along with all other jurisdictions, is pursuing national uniformity (e.g. Compliance and Enforcement Act, fatigue, and heavy vehicle speeding, plus rail reform). More recently COAG has outlined its national transport reform agenda, which further commits jurisdictions to achieving national uniformity.

The speed limit issue mentioned was recently reviewed by DTEI, which did not support an increase to 100km/h, as in WA; Culway data also indicates there is regular speeding by road trains on the Eyre Highway. The 90km/h speed limit for heavy vehicles is uniform throughout Australia, except in WA, leaving WA out of step with the rest of the nation.

The Government has agreed to continue to support the development of nationally consistent and harmonised enforcement and compliance strategies as they progress through the NTC, ATC and COAG (e.g. compliance and enforcement, speed, fatigue etc).

South Australia also will implement the COAG national road and rail transport reforms, which provide a consistent national approach to transport regulation.

8.8.2 Escorting oversize vehicles between States**Issue:**

- States have differing regulations on who can escort an oversize vehicle

It was noted that WA regulation requires drivers escorting oversize vehicles to complete a two-day training course before escorting the vehicle on WA roads. In one instance, due to this short notice, a South Australian operator had to employ a WA driver, at substantial cost, to drive the escort vehicle to the SA border.

Government Response:

This regulation is specific to Western Australia and is not required by any other jurisdiction. Industry should therefore approach the Western Australia Government to rectify this anomaly.

8.9 Regulations and Legislation**8.9.1 Rail safety legislation****Issue:**

- Rail safety legislation is burdensome for local government

Rail safety legislation is considered to have generated more red tape for local government.

Government Response:

The proposed legislation introduces a requirement for road and rail asset managers to undertake joint risk assessments and to document an agreement for the management of shared road-rail infrastructure interfaces. It is the documentation of such agreements that presents the increase in red tape.

It must be noted, however, that there is no obligation on local government authorities to respond or undertake any works as a result of the audits/surveys. The responsibility for reviewing the status of level crossings on an ongoing basis rests with the relevant road and rail asset managers – this has not changed with the introduction of the DTEI level crossing audit/survey program or as a result of the proposed legislative change.

DTEI will continue to support local government in meeting future legislative requirements for safety assessments of level crossings through its level crossing assessment program, which involves site audits and evaluation of safety issues using the ALCAM. The information from this program will be freely available to local government.

The State Government, through DTEI, will work through the State Level Crossing Strategy Advisory Committee (SLCSAC) to produce guidelines and, if appropriate, template documentation that can be used by local governments and rail infrastructure managers to standardise and streamline the process of developing the legally required interface coordination plans.

The Government will work to ensure that the COAG national rail safety reforms introduce consistent legislation and regulatory regimes within each State and Territory and reduce the red tape burden for all stakeholders (road owners and rail operators).

8.9.2 *Tri-axle dollies*

Issue:

- Tri-axle dollies are considered more effective in serving the industry

It was suggested that South Australia should consider allowing the use of tri-axle dollies as they are considered safe and will better serve the future growth of the freight task.

It is noted that tri-axle dollies are used in every State and Territory except South Australia.

Government Response:

Tri-axle dollies have been shown to exhibit stability problems even when they are configured to be properly load-sharing. The issue has been discussed with industry for some time and a PBS safety assessment is required before SA will allow them to be used (predominantly on road trains).

There are serious concerns about the safety of tri-axle dollies that do not fully comply with PBS standards. It is a matter for industry to seek PBS accreditation of a suitable tri-axle dolly design.

The Government has agreed to allow accredited PBS tri-axle dollies to operate within SA.

8.9.3 *Indivisible loads*

Issue:

- Reduce restrictions on indivisible loads

Industry has identified a need to free up restrictions on indivisible loads so operators can carry an additional piece of equipment on the vehicle while travelling to and from a worksite.

Government Response:

These matters are being addressed and appropriate amendments are being made to gazette notices by late 2008 to resolve the industry concerns.

8.9.4 *Freightmaster Medium Articulated and Dog Trailer (MAD)*

Issue:

- MAD vehicles are restricted to 80km/h

It is considered illogical that Freightmaster MADs are restricted to an 80km/h speed limit when they have significant suspension improvements.

Government Response:

The MAD policy is under review with a view to allowing conforming MADs to operate at 90km/h. It is expected to be completed by the end of October 2008.

8.9.5 *Oversize signs*

Issue:

- Clarification is needed on oversize sign specifications

Industry stated that the specifications of 'oversize' signs used on vehicles needs to be clarified. An example was given of an operator who created a hand-made 'oversize' sign (a canvas board attached to steel mesh) for display on an escort vehicle. The driver of the low loader did not believe the sign was appropriate, claiming that it needed to be made out of sheet metal, otherwise penalties would apply.

Government Response:

The policy for the transport of oversize and overmass indivisible loads and vehicles can be located via:

www.transport.sa.gov.au/freight/road/vehicle_configuration/index.asp

*8.9.6 State Government communication with industry***Issue:**

- Slow response from State Government to industry

Industry advised that the State Government requires operators to comply with timelines in relation to consultation and contract processes relating to the awarding of government contracts. However, once this information is received, no timeframe is set before the Government makes a decision. This is considered unacceptable. Such delays in decision making can hinder the chance of an operator securing a contract.

Government Response:

Industry is encouraged to challenge delays in receiving replies or decisions associated with matters that involve government agencies. It should be recognised that sometimes decisions/actions are delayed due to Industry opposition to a proposed direction by government which may require further investigation or consideration. Industry may make requests that government cannot accommodate. Sometimes lack of agreement is interpreted as lack of response. If Industry suggests reforms and/or issues that concern legislation or nationally based policy, they may require significant consultation and/or agreement with other parties who may also be affected. Industry is encouraged to raise any outstanding issues of this nature directly with the relevant agency to ensure delays are kept to a minimum.

The Government will maintain clear channels of communication, especially if delays have been or are expected to be encountered in the process. Government agencies will set, publish and adhere to timeframes for contract management.

8.9.7 Heavy vehicle knowledge of customer service officers

Issue:

- Lack of heavy vehicle knowledge among customer service officers in regional areas

Industry has stated that Service SA officers located in regional areas often lack knowledge of heavy vehicle matters and, in most cases, it is considered easier for operators to travel to Adelaide to resolve their issues.

Government Response:

Service SA acknowledges the need for staff to have a consistent level and breadth of knowledge. To this end, an initiative has been identified to develop a knowledge management system (KMS) that will assist staff to build their working knowledge of specialist areas such as heavy vehicles. This KMS project is subject to the availability of funds. In the interim, Service SA will instruct staff to contact the Regency Customer Service Centre for advice on specialist heavy vehicle enquiries. In this way, customers will have recourse to service expertise across the network.

The Government has agreed that Service SA should instruct staff to contact the Regency Park Customer Service Centre for support with specialist heavy vehicle inquiries.

The Government will investigate the development of a database that will help staff build their working knowledge of specialised areas such as heavy vehicles.

8.9.8 Availability of heavy vehicle regulations and policies

Issue:

- Operators should be able to access heavy vehicle regulations and policies readily

It was suggested to the review team that all heavy vehicle regulations and policies should be readily available on the DTEI website and through more effective direct access at DTEI offices and Registry and Licensing offices.

It was suggested that over-reliance on the growing use of the internet must be avoided because many of the smaller operators do not have sophisticated computers or knowledge of the internet; in any case, many have only poor access to low-speed internet links.

Government Response:

The DTEI website currently contains copies of heavy vehicle gazette notices, codes of practice and other heavy vehicle policies via:

www.transport.sa.gov.au/freight/road/vehicle_configuration/index.asp

The DTEI website also provides access to the South Australian legislation website and Commonwealth legislation via:

www.transport.sa.gov.au/legislation/existing_legislation/index.asp

As an alternative to web access, DTEI offers an email, fax and postal service of gazettes (codes of practice) and public notices. The Gazettes (Code of Practice)/ Public Notices form to subscribe to this service can be accessed via:

www.transport.sa.gov.au/freight/road/vehicle_configuration/index.asp,

or by telephoning DTEI's public notice administrator on (08) 8343 2274; or by visiting a Service SA outlet and asking for a printed copy.

Information on changes to Commonwealth, State and Local Government legislation/regulation is available on the Business Licence Information System (BLIS) website via <http://www.bli.net.au/sa>

The Government will complete a major redevelopment of the structure, format and content of DTEI websites.

8.10 Employment and Training

8.10.1 Heavy vehicle training programs

Issue:

- The cost and time required to attend training is a barrier

It was highlighted that the cost and time required to undertake the B-double and larger heavy vehicle training programs is a barrier, particularly given the need for farm communities to have a pool of drivers to manage the peak demand experienced during harvest. It becomes prohibitive when personnel are required to undertake training in Adelaide for a three-to-four-day period.

It was suggested that there need to be some additional incentives to attract people into these courses; and that in major regional areas courses should be offered at different times of the year to make them more accessible for personnel associated with the farming community.

Government Response:

The transport industry registered training organisation, known as the Transport Training Centre or TTC, is one of the key providers in South Australia. TAFE SA, the public VET provider, does not provide heavy vehicle training.

The TTC offers a wide range of courses specifically for the transport and distribution industries. Courses are provided on site as well as in the field, depending on demand. The TTC can accommodate those preferring to do a course over three to four consecutive days course over a period of three to four weeks. Courses are held daily, including at weekends.

Courses are widely promoted through mechanisms such as the TTC website, brochures, newspapers, the TTC vehicle and exhibition trailer, television and

radio. The SAFF promotes TTC courses and discounts are offered to SAFF members (details via the SAFF website).

The more extensive adoption by the transport industry of national accreditation schemes like the NHVAS, with its well-defined training modules, will address the training issue.

On 16 February 2008 the Government announced the establishment of the Future of SA Freight Taskforce, to address the issue of a sustainable future supply of truck drivers across South Australia. The taskforce will involve DTEI, SAPOL, SafeWork SA, DFEEST, SARTA, the SA Freight Council, DTED, the TWU, and Transport Distribution Training SA, a Skills Board.

8.10.2 South Australian Workers Compensation and Rehabilitation Scheme

Issue:

- This scheme is considered to adversely affect operator competitiveness in the State.

It was asserted that the South Australian Workers Compensation and Rehabilitation Scheme is poorly managed and has made transport operators less competitive within South Australia. The review team was advised that companies are responsible for submitting a 'request for reimbursement' form to WorkCover to recover costs for workers receiving income maintenance. It was asserted that payment can be 'lost out of the system'. If this is not done, unlike in Victoria, where reimbursements are automatically processed.

Government Response:

WorkCover is committed to improving the workers compensation environment for all parties involved. In the event of a claim, employers are encouraged to continue making direct income maintenance payments (weekly compensation payments) to assist injured workers in the return to work process, by:

- Maintaining communication between the employer and worker.
- Maximising employer involvement in the management of the claim.

Work Cover has initiated a system for employers to improve the process of reimbursing income maintenance payments. The reimbursement of employer income maintenance payments is made upon receipt of Income Maintenance Reimbursement Slips (IMRS). These slips may be submitted in paper form or electronically. The online IMRS system enables the employer to request reimbursement via the internet; the system automatically processes the request and payment. This system is quicker than using the paper form and through an online summary page allows the employer to keep track of submitted and paid IMRS accounts. This allows the employer to track IMRS submissions and ensure requests are submitted within the required three-month timeframe. Information on the online IMRS process is available at: www.workercover.com/Home/Employers/RegisteredEmployers/Incomemaintenancereimbursement.aspx#

8.10.3 Heavy vehicle driver training systems

Issue:

- Government needs to recognise the two different heavy vehicle driver training systems – Vehicle On Road Test (VORT) and Competency Based Training (CBT).

The review team heard that one of the largest heavy vehicle driving schools in SA has highlighted the need for Government to recognise that there are two different heavy vehicle driver training systems operating in SA: Vehicle On Road Test (VORT) and Competency Based Training (CBT). However, it is believed that the Government intends to phase out the VORT system.

Industry advised that in one case:

'This operator functions under the VORT system (like most companies) and is finding it difficult to find VORT testing officers (only 20 on the SA register but not all work full-time due to their age – near retirement). Most driving schools will not allow their own testers to do tests for other schools. The operator has been told that to upgrade their staff to become testing officers, they need to be trained in all CBT classes first and then after a series of audits involving officers from the Driver Development Centre (DDC) in Oaklands Park, can go

on to become testing officers. It can take a number of weeks before a DDC auditor is available to undertake this task. The time and money involved in undergoing this process is considered too costly for the average driving school, particularly when they only operate under the VORT system. The company has brought new Motor Driving Instructors (MDI) to its school and has trained them in the VORT system. The next step is for them to become VORT testers. This operator is finding that candidates are now booking interstate to get their truck licence (mostly for fire brigade entry) because of the shortage of instructors.'

It is proposed that once candidates have completed the 2-day theory course, they should be given the option of doing their practical training in either CBT or VORT.

It is noted that MDI course candidates now have to pass a reading and writing test before entry.

Example: Going from a car to a semi licence involves candidates participating in a two-day theory course followed by practical training with a CBT-approved instructor (there are only 35 CBT-approved instructors on the SA register, however not all are working due to their age). This operator has only one CBT-approved instructor but he is of retirement age and now seriously ill and there is no one to replace him. The operator has been training for 29 years but is not a CBT instructor so cannot train candidates in CBT. Candidates cannot take a VORT test – only logbook. There is considered to be no justification for the CBT-only ruling as this operator has students who have a lesser truck licence or have not used their licence for years come in and start training without doing any theory or having to do the logbook system.

Government Response:

This matter will be examined by the Future of SA Freight Taskforce, whose establishment was announced by the Minister for Transport on 16 February 2008.

8.10.4 Heavy vehicle driving test criteria

Issue:

- Driving test criteria need to be updated.

It was suggested that the heavy vehicle driving test criteria need updating. The review team heard that testing of hill starts is conducted on a flat road. It was suggested that test routes should be reviewed and updated and that the criteria should also include emergency stopping, which is not covered under the CBT system.

Government Response:

This matter will be examined by the Future of SA Freight Taskforce, whose establishment was announced by the Minister for Transport on 16 February 2008.

8.10.5 Forklift training

Issue:

- Companies offering forklift training must become a Registered Training Organisation by July 2008.

It was highlighted that the Government (SafeWork SA) does not recognise qualifications of immigrants. An example was provided of an operator with a Scottish employee he wants to use to provide forklift training for the company. The employee has trainer qualifications in all classes of plant machinery but has been told he has to do a 15-week training and assessment course before he can provide forklift training in SA because SafeWork SA will not recognise his overseas qualifications.

The operator was also advised that from July 2008, a company offering forklift training must be a Registered Training Organisation (RTO). The operator asks what benefits are there to the paying customer arising from RTO status. It was asserted that RTO status does not necessarily mean quality trainers are employed there. It was stated that RTO status is considered to be just a paper trail and offers no benefits to driver training/trainers.

Government Response:

SafeWork SA focuses on assessment and does not prescribe requirements in relation to the training of forklift operators.

SafeWork SA's interest is at the point where a person is to be assessed for obtaining a licence to operate a forklift. Like all other States and Territories, South Australia will adopt the new requirements of the national licensing standard. In accordance with this standard, SA will require registered assessors to be linked to a RTO. Effectively, this means the assessment must be undertaken within the RTO framework. There is a very strong view expressed by all stakeholders (particularly the business organisations) that the addition of RTOs to the process adds quality that was previously missing. Indeed, all States and Territories are entering into agreements with the State/Territory training authorities to undertake joint audits of participants in the scheme to ensure there is quality in both training and assessment practices, and this is therefore far from being a paper trail. This new arrangement will now not commence in South Australia by July 2008; instead, it is anticipated it will come into effect by late 2008 or early 2009.

In order to ensure OHS harmonisation and transferability of licences across Australia, SA needs to ensure that it adopts the national standard.

8.11 Miscellaneous**8.11.1 Medicals for heavy vehicle drivers****Issue:**

- Medicals are not rigorous enough.

It was asserted that medicals for heavy vehicle drivers need to be more rigorous, particularly given the industry's ageing workforce.

Government Response:

The Government requirements for medical tests of heavy vehicle drivers are considered adequate. This does not preclude transport operators as

employers with statutory OHS&W responsibilities from implementing their own more rigorous health policies and schemes.

This matter will be examined by the Future of SA Freight Taskforce, whose establishment was announced by the Minister for Transport on 16 February 2008.

The Government will ensure that doctors are involved in the development of appropriate medical tests.

8.11.2 DTEI Website

Issue:

- The DTEI website is difficult to navigate around

The review team was told the DTEI website is considered difficult to navigate around and needs to be updated and simplified.

Industry said, 'It is imperative that DTEI continue to improve the website and make it easy to use and especially in locating and then downloading the many documents and maps that truck operators are now required to use.'

Government Response:

The Government will complete a major redevelopment of the structure, format and content of the DTEI website/s and continue to improve access to the new RAV maps.

8.11.3 Transport costs for Kangaroo Island farmers

Issue:

- The cost of travelling by ferry makes Kangaroo Island farmers uncompetitive

The cost of travelling on the ferry is considered too expensive and makes it uncompetitive for farmers based on Kangaroo Island to transport their produce to market.

Government Response:

While the Government provides ferry operators with a subsidy to assist them to operate a Kangaroo Island service, the prices the operators charge is a commercial decision.

*8.11.4 Communication with DTEI***Issue:**

- Finding the right DTEI person to speak to is difficult

It is considered far too difficult and time-consuming to identify, locate and then contact the right people in DTEI for dealing with various issues.

A very simple improvement would be for an effective, perhaps web-based, contact directory to be provided to enable the industry to contact the right DTEI officers on various issues. This would also reduce the amount of time lost by other DTEI staff in identifying the required area for a caller and then putting the caller through.

Government Response:

Members of the Heavy Vehicle Industry Forum have been provided with contact lists for heavy vehicle areas within DTEI and these lists are now on the DTEI website via www.transport.sa.gov.au/freight/road/index.

*8.11.5 Truck configuration assessment tool***Issue:**

- The truck configuration assessment tool used to determine road wear acceptability for new vehicle designs raises significant issues.

It was noted that SARTA only recently became aware of an assessment tool being used by DTEI to determine whether or not a proposed new truck configuration (such as a four-axle rear axle group on a new semi-trailer design) will produce an acceptable level of road wear for the mass it will carry. Industry made the following comments:

'The blue line is a graph of the total vehicle mass plotted against the "equivalent standard axle" rating of the new design. It effectively plots the line above which DTEI considers that the road wear will be unacceptable. Happily, this information, having come to light, is now available to the industry and we will certainly take it into account when developing vehicle designs.

'There are, however, two significant issues that it raises:

1. The impending growth in road freight volumes (up to 100% by 2020, according to the Federal Government) will mean the State must consider that growth in the context of its impact on all HV regulations and their consequences. In relation to the use of the blue line, this will require, if not demand, a comprehensive assessment and comparison by DTEI to answer this question:

- Does the current blue line plot provide the best overall cumulative road wear outcome for the State's road infrastructure when the growth in road freight by 2020 is taken into account (whether that is 50%, 75% or 100% extra)?

In other words, a comparison of the cumulative overall road wear from the total freight task performed by using either:

- a. 50%, 75% or 100% more trucks (or more truck movements) of the current designs that are on or below the blue line to move the increased freight volumes; or
- b. A smaller number of more productive trucks that are above the blue line (but not excessively so) to move that same volume of freight.

'It is only by making this assessment of the cumulative overall road wear that the objective of securing the best road wear outcomes in the overall context can actually be achieved in any meaningful way.

'The Department is only using the blue line plot to assess the impact of individual trucks in complete isolation from any consideration of the total road wear impact. This is short-sighted and even irresponsible, in our view.

'We have therefore asked the Department to do the above comparison and to discuss it in detail with SARTA.

2. Secondly, we are advised by the NTC that, in fact, other States are not adopting the blue line plot so rigidly and, if this is the case, then once again we will be perpetuating interstate differences and inconsistencies.

'SARTA believes that use of a thin blue line is inappropriate and that the concept would be more valid if the above proposed comparison of the cumulative road wear impact between the two scenarios is done to determine an upper and lower range that establishes a blue zone or band which delivers the optimal cumulative road wear outcomes for the impending increased freight task.'

Government Response:

SARTA members were briefed on the PBS vertical loading standard (blue line) at their annual conference on 15 February 2008. DTEI is preparing a response to the issues raised by SARTA for presentation to the Heavy Vehicle Industry Forum so that all sectors of the transport industry are properly briefed. The PBS vertical loading (blue line) standard has been adopted by all jurisdictions in line with the ATC decision supporting PBS.

8.11.6 Progress Reporting

The Government has agreed that progress regarding the issues identified in this review will be reported to the Heavy Vehicle Industry Forum.

ATTACHMENT 1: INTERVIEW QUESTIONS

1. Which regulations and licenses cause your businesses the biggest problem? In particular,
 - a) Which regulations are most difficult to comply with? Why?
 - b) Which regulations are most costly to comply with? This could mean financial costs as well as the time and effort it takes to comply with regulations, like record keeping and reporting.
2. Which regulations/licenses could be removed or reduced because they are unnecessary, overlapping, repetitive or inconsistent?
3. What would you like the State Government to do to reduce red tape for your industry?
4. How hard is it to find information to set up or expand a business in this industry?
5. Aside from those government authorities that directly licence your business, do you have any specific feedback about your interaction/engagement with other parts of government?
6. For those businesses that operate nationally, how does South Australia's regulatory burden compare with other states and territories?
7. Do you have any specific ideas for reducing government red tape in your business?
8. For those regulations set nationally, which do you believe are in greatest need of reform? Why?

ATTACHMENT 2: HEAVY VEHICLE ROAD TRANSPORT INDUSTRY REVIEW

Reference of Abbreviations

ABBREVIATION	DESCRIPTION
ALCAM	Australian Level Crossing Assessment Model
ATC	Australian Transport Council
BCA	Bus and Coach Association
BLIS	Business Licence Information Service
C&E	Compliance and Enforcement
CBT	Competency Based Training
COAG	Council of Australian Governments
DECS	Department of Education and Children's Services
DFEEST	Department of Further Education, Employment, Science and Technology
DTED	Department of Trade and Economic Development
DTEI	Department for Transport, Energy and Infrastructure
FIRS	Federal Interstate Registration Scheme
HML	Higher Mass Limits
HVAF	Heavy Vehicle Access Framework
HVDF	Heavy Vehicle Driver Fatigue
IAP	Intelligent Access Program
IMRS	Income Maintenance Reimbursement Slips
KMS	Knowledge Management System
MA	Measurement Adjustments
MAD	Medium Articulated and Dog Trailer
MDI	Motor Driving Instructors
MDL	Mass/Dimension Load Restraint

ABBREVIATION	DESCRIPTION
NAASRA	National Association of Australian State Road Authorities
NHVAS	National Heavy Vehicle Accreditation Scheme
NSW RTA	Roads Traffic Authority, NSW
NTC	National Transport Commission
OHS&W	Occupational Health Safety and Welfare
PBS	Performance Based Standards
PTA	Passenger Transport Act
RAV	Restricted Access Vehicle
RIS	Regulatory Impact Statement
RTO	Registered Training Organisation
SAFF	South Australian Farmers Federation
SALEG	South Australia Law Enforcement Group
SAPOL	South Australian Police
SARTA	South Australian Road Transport Association
SLCSAC	State Level Crossing Strategy Advisory Committee
SMART	Safer Management of Australian Road Transport
TRUMPS	Motor registration IT system
TSCO	Transport Safety Compliance Officer
TTC	Transport Training Centre
TWU	Transport Workers' Union
VET	Vocational Education Training
VORT	Vehicle On Road Test
VREX	Vehicle Regulation Exchange