National Transport Commission

Heavy Vehicle Compliance Review: Final Report

Report prepared by: National Transport Commission

ISBN: 978-1-921604-57-7
| **Title:** | Heavy Vehicle Compliance Review: Final Report |
| **Type of report:** | Final Report |
| **Purpose:** | Report on the findings of this review for consideration by the National Heavy Vehicle Regulator. |
| **Abstract:** | This paper presents the findings of the Heavy Vehicle Compliance Review based on the Consultation Draft, feedback from stakeholders and the outcomes of related projects. These findings may inform the development of policies and strategies of the National Heavy Vehicle Regulator. |
| **Key milestones:** | Government Draft released January 2013; modified Consultation Draft released September 2013; Final Report. |
| **Key words:** | compliance and enforcement; heavy vehicle; responsive regulation; regulatory intervention; alternative compliance; National Heavy Vehicle Regulator (NHVR); Heavy Vehicle National Law (HVNL) |
| **Contact:** | National Transport Commission  
L 15/ 628 Bourke Street  
Melbourne VIC 3000  
Ph: (03) 9236 5000  
Email: enquiries@ntc.gov.au  
www.ntc.gov.au |
Foreword

The National Transport Commission (NTC) is an independent body established under an Act and intergovernmental agreement to provide independent advice to transport ministers on regulatory and operational reforms. The NTC undertakes these reforms across road, rail and intermodal transport to improve safety, productivity and environmental outcomes.

For many years the Australian Government and the state and territory governments, with input from industry and other stakeholders, have been working towards increased harmonisation of heavy vehicle regulation. In July 2009 the Council of Australian Governments agreed to establish the National Heavy Vehicle Regulator and a national body of law governing the regulation of all vehicles weighing more than 4.5 tonnes. The Heavy Vehicle National Law was proclaimed in 2012 and the National Heavy Vehicle Regulator (NHVR) opened its doors in January 2013.

This compliance review complements the heavy vehicle national law and proposes where and how the intervention strategies made possible by the law should be used. It recognises that the establishment of the NHVR provides an unprecedented opportunity to adopt a truly national approach to the challenge of compliance. This Review seeks to leverage from that opportunity. The review suggests how current compliance and enforcement resources and tools can be leveraged to reduce red tape and improve compliance. This, in turn, will result in improved safety and reduced damage to infrastructure.

Extensive consultation has been undertaken between the NTC and Australian state and territory transport agencies and police forces in developing this review. Input from industry has been sought through direct consultation with industry peak bodies and drivers and operators. Further, some 20 submissions were received in response to the Consultation Draft, upon which this Final Report is based. The contribution of other regulatory bodies both in Australia and overseas is also gratefully acknowledged. Finally I would like to acknowledge the NTC staff past and present who contributed to this work.

David Anderson PSM
Chairman
Executive summary

Project background

Australia is and will continue to be highly reliant on road freight to supply goods and services.\(^1\) Compliance with heavy vehicle laws remains important for the safety of road users, protection of the network and for the wellbeing of the community. Where compliance fails, enforcement of the law is essential.

The Heavy Vehicle National Law (HVNL) brings together a range of approaches to compliance and includes various enforcement tools to be utilised on a national basis.\(^2\) With the commencement of the National Heavy Vehicle Regulator (NHVR) comes the opportunity to extend the best practice use of compliance and enforcement tools in a coherent manner across the participating states and territories.

The purpose of the Heavy Vehicle Compliance Review has been to understand current practice in heavy vehicle compliance and enforcement across Australia; to explore the motivations for non-compliance; to analyse the powers available under the Heavy Vehicle National Law (HVNL) to secure compliance including where and how they are used; to consider the role of technology and meta-regulation in compliance; and to develop findings aimed at promoting compliance.

Project findings

Research, discussions and stakeholder feedback and formal submissions have resulted in the following review findings, which are intended to inform ongoing compliance and enforcement strategies of the NHVR.

Sufficiency of and access to information

Responsive regulation describes an approach to compliance and enforcement that seeks to redress non-compliance in a manner both mindful of and proportionate to the motivations of the regulated party. The ability to make educated decisions about motivation relies on sufficient, timely and accurate information. The value of an intelligence-based system is found in both its ability to more meaningfully target resources towards higher risk offenders as well as in its ability to help identify compliant operators and allow governments to provide appropriate incentives.

**Finding 1:** (i) That the National Data Strategy being developed by the NHVR is critical as a means of collecting, assessing and leveraging intelligence to enable meaningful differentiation between operators and other parties; (ii) that an intelligence-sharing protocol would facilitate appropriate data collection. This protocol could be developed by the NHVR in consultation with relevant stakeholders.

Consistency of compliance across legislative requirements

The HVNL operates within a broader legislative context, which includes laws relating to work, health and safety, dangerous goods, animal welfare and food handling. This potentially leads to frustrations for industry where there may be, or may be perceived to be, duplications across the broader regulatory framework.

---


\(^2\) It is noted that the Northern Territory and Western Australia have not adopted the HVNL and therefore remain outside of its effect.
Finding 2: That there is a need to examine potential overlaps between the HVNL and dangerous goods, animal welfare and food handling legislation. The NTC will assess this as a candidate project in developing forward work programs.

General education
Most people are inclined to comply with the law if given sufficient, accurate information. Many transport authorities have an overt education service function, designed to promote compliance across the industry and to provide a forum for advice and assistance. In addition, transport authorised officers and many police see heavy vehicle compliance education as being part of their role. The NHVR has a unique opportunity to provide a 'one stop shop' for advice and assistance generally, as well as engaging with specific sectors that may not be aware they are subject to the heavy vehicle laws.

Finding 3: That the education role of the NHVR for industry, including individual industry sectors, will be critical to improving compliance.

Improvement notices and formal warnings
The use of improvement notices and warnings as compliance tools has been minimal, potentially due to restrictions on which authorised officers may issue them and the need for some technical knowledge or compliance history on the part of the enforcement officer. Where used, enforcement officers have indicated these are effective in securing compliance. The production of guidelines may help promote their nationally consistent use.

Finding 4: That guidelines on the use of improvement notices and warnings for all authorised officers (i.e. transport officers and police) would facilitate greater use of this important tool.

Published compliance policies
Published compliance policies can be used to explain the powers available to the NHVR, broadly describing where and how they will be used; what they are designed to do; the kind of treatment one can expect where the powers are invoked; and how decisions can be appealed.

Finding 5: That a published NHVR compliance and enforcement policy would help clarify expectations of industry and improve consistency.

Publishing enforcement outcomes
Publicising the outcomes of enforcement activity reminds law-abiding regulated parties that offenders are being dealt with; helps clarify expectations for industry and may improve self-regulation.

Finding 6: That where possible enforcement data (including on improvement notices, warnings, infringements, defect notices and directions) and the outcome of prosecutions should be collected and published.

National Heavy Vehicle Accreditation Scheme
Feedback from industry and governments indicated that the National Heavy Vehicle Accreditation Scheme (NHVAS) may not be meeting its original intent.

Finding 7: That NHVAS governance structures may benefit from strengthening NHVR oversight and control of the NHVAS audit function, in consultation with relevant agencies. Note, any changes
would be subject to ministerial approval and the current Heavy Vehicle Roadworthiness Program being undertaken jointly by the NHVR and NTC will inform future improvements.

**Infringements**

Infringement notices are an efficient enforcement mechanism as they provide an alternative to costly and lengthy court proceedings, give recipients the option of paying a fine of lesser value than potentially handed down by a court and fulfil the requirement of regulatory best practice in terms of immediacy and proximity to the occurrence of the offence. However, they are generally accepted as being less effective tools of rehabilitation and community protection.

**Finding 8:** That there is a need for further research on the extent of recidivism among persons issued with infringements under heavy vehicle law. The NTC will assess this as a candidate project in developing forward work programs.

**Finding 9:** That tracking and public reporting on issuing infringements by offence, and on the outcomes of internal and judicial review of infringements, would provide greater transparency over the use of infringements and greater confidence that they are being used appropriately.

**Court imposable penalties**

Enforcement agencies expressed frustration that court based fines generally represent only a fraction of the potential maximum fine and may not reflect the risks of the behaviour involved. There was concern that this may impact on the effectiveness of court imposed penalties.

**Finding 10:** That there is a lack of data surrounding court imposed fines and the reasons behind those fines. This could be rectified by a study of heavy vehicle penalties imposed by courts, to better understand the reasons behind the imposition of particular penalties. The NTC will assess this as a candidate project in developing forward work programs.

**Non-monetary penalties**

The HVNL allows for a range of court-imposable penalties capable of punishing and deterring more serious offenders. Historically, the use of the broader set of enforcement tools available under heavy vehicle law has been minimal and greater guidance on the use of these tools would assist in their broader use, resulting in better compliance and enforcement outcomes.

**Finding 11:** That the full set of enforcement tools available under the HVNL would be better utilised if there was greater guidance available. In particular, guidelines should be developed on:

- gross commercial benefits orders, including how they may be derived;
- compensation orders, including how they may be derived;
- supervisory intervention orders, including their purpose and use; and
- prohibition orders, including their purpose and use.

**Chain of Responsibility**

Chain of Responsibility (CoR) is designed to ensure that any party in a position to control, influence or encourage particular on-road behaviours is identified and held appropriately accountable. The consensus among stakeholders is that CoR investigations should be part of the NHVR’s ongoing compliance effort. Previously, CoR investigations have largely operated within state borders, due to limitations of power extended to enforcement agencies, noting that supply chains often extend beyond state borders.

**Finding 12:** That there would be a benefit in a strong focus being taken by the NHVR on Chain of Responsibility investigations, including:
• ensuring appropriate resources are available to CoR investigations;
• pursuing the recommendations of the CoR Review; and
• examining opportunities for, and barriers to cross-border CoR investigations.
# Table of contents

**Report outline** iii  
**Foreword** iv  
**Executive summary** v  
  - Project background v  
  - Project findings v  
  - Chain of Responsibility vii  
1. **Introduction** 3  
  1.1 Review context 3  
  1.2 Consultation Draft 3  
  1.3 Purpose of this Final Report 3  
  1.3.1 Structure 3  
2. **The importance of compliance** 5  
3. **Approaches to compliance** 6  
  3.1 Responsive regulation 6  
  3.2 Alternative compliance 6  
  3.3 National Heavy Vehicle Law 6  
4. **Why non-compliance occurs** 7  
  4.1 Determining motivation: the problem of intelligence 7  
  4.1.1 Sufficiency of and access to information 7  
  4.1.2 Stakeholder feedback 8  
5. **Achieving compliance** 9  
  5.1 Consistency of compliance across legislative requirements 9  
  5.1.1 Stakeholder feedback 9  
  5.2 Education and persuasion 9  
  5.2.1 General Education 9  
  5.2.2 Stakeholder feedback 10  
  5.3 Improvement notices and formal warnings 10  
  5.3.1 Stakeholder feedback 10  
  5.4 Published compliance policies 11  
  5.4.1 Stakeholder feedback 11  
  5.5 Publishing enforcement outcomes 11  
  5.5.1 Stakeholder feedback 12  
6. **Gateway and preventative mechanisms** 13  
  6.1 National Heavy Vehicle Accreditation Scheme 13  
  6.1.1 Stakeholder feedback 13  
7. **Enforcement tools** 14  
  7.1 Infringements 14  
  7.1.1 Stakeholder feedback 15  
  7.2 Court imposable penalties 15  
  7.2.1 Stakeholder feedback 16  
  7.3 Non-monetary penalties 16  
  7.3.1 Stakeholder feedback 17  
8. **Chain of responsibility** 18  
  8.1.1 Stakeholder feedback 18  
9. **Other issues of note** 19
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1 Technology for compliance</td>
<td>19</td>
</tr>
<tr>
<td>9.2 Incentives and rewards</td>
<td>19</td>
</tr>
<tr>
<td>9.3 Western Australian Approach to Fatigue</td>
<td>19</td>
</tr>
<tr>
<td>10. Stakeholder responses</td>
<td>20</td>
</tr>
<tr>
<td>11. References</td>
<td>21</td>
</tr>
</tbody>
</table>
1. Introduction

1.1 Review context

Laws and policies introduced since the 1970s have resulted in significant improvements in road safety outcomes. The number of fatalities involving large, heavy vehicles in Australia is trending downwards and industry members interviewed as part of this project expressed a strong commitment to safety.

The Heavy Vehicle National Law (HVNL) brings together a range of approaches to compliance and includes various enforcement tools to be utilised on a national basis. With the commencement of the National Heavy Vehicle Regulator (NHVR) comes the opportunity to extend the use of compliance and enforcement tools in a coherent manner across the participating states and territories. The advent of this national approach to heavy vehicle road transport regulation also presents the opportunity to consider the appropriateness of approaches to compliance and how it is encouraged, promoted and enforced.

1.2 Consultation Draft

In late 2013 the National Transport Commission (NTC) released the Heavy Vehicle Compliance Review Consultation Draft for public consultation. The Consultation Draft explored the motivations for non-compliance and undertook to analyse the powers provided by the HVNL to secure compliance. It also considered how the use of technology and meta-regulation influence compliance.

The Consultation Draft contained a number of proposed recommendations, on which feedback was sought from stakeholders. These recommendations were the result of a significant research project that involved structured interviews with drivers, operators, peak bodies and enforcement officers, in addition to roadside observation and a review of relevant literature. Its release generated 20 submissions from a range of stakeholders including industry groups and companies, government agencies and interested individuals.

1.3 Purpose of this Final Report

This Report does not duplicate the content of the Consultation Draft. Instead it is the culmination of the work undertaken to finalise that document, the feedback received and a refinement of the research findings. The findings presented in this Final Report are based on those findings contained within the Consultation Draft. However, the NTC has also taken into consideration the feedback received, the commencement of the NHVR and outcomes from related projects.

It is important to note that the Heavy Vehicle Compliance Review Final Report is not an operational strategy. For this reason it does not make recommendations about the deployment of resources or quantify how interventions should occur. Instead, this document and the Consultation Draft contain key research and findings that may be used as a reference for the future and may inform future policies and strategies of the NHVR.

The findings contained in this report will be considered by the NHVR and the NTC as part of developing their forward work programs. It is noted that some of these findings may be amalgamated into current projects. Where this is the case, it has been noted appropriately.

1.3.1 Structure

This Report begins with an explanation of the importance of compliance in the road freight sector. A number of approaches to compliance are outlined, demonstrating the progression from the more traditional approach of ‘command and control’ that existed prior to the 1990s, through to responsive regulation and alternative compliance. ‘Responsive regulation’ considers an offender’s motivation...
and delivers a proportionate regulatory response; alternative compliance includes accreditation schemes that operate outside of or complimentary to the regulatory system.

The HVNL provides a mechanism for and an opportunity to create a national approach to regulating heavy vehicles and recognises a range of regulatory approaches to compliance. It also allows for a suite of tools for road agencies to execute their enforcement duties.

The Report goes on to consider why non-compliance may occur. Motivations for non-compliance range from a lack of understanding of the law and how it applies to particular regulated parties; a response to economic imperatives created by the marketplace; through to determined recidivism from those with little respect for the law. The Report notes the difficulty in discerning motivation on the basis of limited information and inconsistent data on why non-compliance occurs. This makes responsive regulation challenging.

A number of findings are outlined, beginning with those applicable to achieving compliance (Chapter 5) though consistent legislative requirements and education for both regulators and regulated parties on how the law should be complied with and enforced. Gateway and preventative mechanisms – including alternative compliance options – are considered at Chapter 6. In particular the National Heavy Vehicle Accreditation Scheme (NHVAS) is identified as a starting point, but in need of review.

Chapter 7 details the tools available to enforcement agencies and the courts under the HVNL, how these might be used to understand how and why non-compliance occurs, and how to encourage the use of tools (such as supervisory intervention orders and prohibition orders) in addition or as an alternative to monetary penalties. Chapter 8 discusses the importance of chain of responsibility to heavy vehicle compliance and enforcement. Chapter 9 discusses other issues from the Consultation Draft.
2. The importance of compliance

Compliance with heavy vehicle laws remains important for the safety of road users, protection of the network and for the wellbeing of the community. Additionally, fairness for drivers and operators can be enhanced through compliance. Where compliance fails, enforcement of the law is essential.

The link between non-compliance with heavy vehicle laws and undesirable safety outcomes is well substantiated. Significant changes to on-road behaviours and community expectations have been achieved since introducing key pieces of law and policy placing an emphasis on road safety. As a consequence safety has become a key consideration for many within the heavy vehicle industry. Despite significant reductions in the fatality rate involving heavy vehicles, the risk within the heavy vehicle industry remains.

Non-compliance within the industry can impact on the activities of compliant participants, and is particularly severe on owner-operators. These parties make up some 60 per cent of the industry, however are only accountable for a small percentage (11 per cent) of the income. Low profitability and high competition potentially encourages non-compliant behaviour where maintenance, safety and regulated undertakings are neglected to meet tight margins.

Non-compliant vehicles, particularly those that are badly maintained or travel overloaded, accelerate road infrastructure degradation. This leads to concerns for road managers and compromises safety. The costs of road infrastructure damage are borne by all road users.

Reports suggest that truck drivers, on average, work longer work weeks than typical full-time worker. There is evidence of higher rates of stimulant use to manage fatigue amongst truck drivers. This is in addition to health concerns associated with lengthy shifts and night work, which pose significant risks for both the driver and other road users. Additionally, sleep apnoea is a concern amongst truck drivers. Lengthy sedentary periods, changing timing of shifts and limited access to fresh food may also compromise an individual’s health and fatigue management.

The stress of the job is a potential health concern. For drivers stress may be caused by fear of infringement and the confusion of navigating varied laws or approaches to the law across jurisdictional borders. Finances may also be a cause of stress due to the competitive nature of the industry, or where the driver is an owner-driver and has placed personal collateral against his business assets. Stress is not easily quantifiable; however it is a contributor to an individual’s wellbeing.

---


8 The reported Australian normative value for the use of meth/amphetamine (speed) is 3.2. The value for transport workers is 11.7. See University of Queensland, Health Survey of the NSW Transport Industry, March 2008, p.43. ANZPAA indicated that positive oral fluid test rates of 1:12 are found amongst truck drivers tested by Victoria Police.

9 ANZPAA submission dated 11 November 2013, p.2

10 Karp, Jann, ‘Conversations with Truckies: Looking at Life through Glass’, presentation to the National Transport Commission, 8 August 2012.

3. Approaches to compliance

Until the early 1990s heavy vehicle compliance largely focused on detecting and punishing directly observable non-compliant behaviour, and assumed a direct link between deterrence and the severity of punishment. However, some limitations to this traditional approach to compliance and enforcement have become evident. The traditional approach meant the driver bore the brunt of the punishment and safety risk, while potential influences from economics or cultural forces along the supply chain were ignored and unchanged.

Deterrence theory reveals that the size of the punishment is relatively meaningless to offenders and potential offenders. Instead, the probability of detection and punishment is more likely to drive compliant behaviour. Increasing freight volumes, plateauing of compliance expenditure, challenges of geography, evolving technology and increased awareness of the influence of supply chain parties, mean new approaches to compliance and enforcement need to be considered.

3.1 Responsive regulation

Responsive regulation considers what motivates non-compliant behaviour and aims to deliver a proportionate regulatory response to the risk posed by that non-compliance. This requires a suite of intervention strategies, some of which were introduced with the Road Transport Reform (Compliance and Enforcement) Bill in 2003. Significantly, the Bill enshrined the concept of Chain of Responsibility (CoR), which recognises the influence of off-road parties on on-road compliance outcomes.

3.2 Alternative compliance

Accreditation schemes have a role to play in promoting compliance. Scheme participants are generally accepted as meeting higher standards than those required by the laws alone and therefore less roadside enforcement intervention would be dedicated to scheme participants. This provides efficiency benefits for both industry and enforcement operations.

The National Heavy Vehicle Accreditation Scheme (NHVAS) was approved in 1997 and has evolved into a form of alternative compliance. Initially administered by the NTC, the scheme has transitioned to the NHVR and is currently under review due to concerns relating to the integrity of the auditing of the scheme.

3.3 National Heavy Vehicle Law

The introduction of the HVNL means that for the first time, Australia has introduced a national approach to the regulation of heavy vehicles. The HVNL consolidates more than 20 years of model laws designed to harmonise heavy vehicle operations, and is administered by the NHVR.

The NHVR presents an opportunity to coordinate compliance and enforcement tools across the participating jurisdictions. It also allows for national consideration of approaches to compliance and how compliance is encouraged, promoted and enforced.

---

13 With participation from all states except the Northern Territory and Western Australia.
4. Why non-compliance occurs

The Consultation Draft contains a detailed discussion on why non-compliance with the law may occur. Understanding those factors is integral to effective responsive regulation. However, as noted in the Consultation Draft, research into motivations for non-compliance specific to the heavy vehicle context is limited.

There are a number of reasons why regulated parties may not comply with the law. These include the following.

- Lack of understanding about the law, its obligations, and how it applies to them. This may apply to both regulated parties and officers enforcing the law, and recognises a need to promote compliance through information about how the law should be administered.
- Lack of ability to comply, which may be attributed to the lack of clarity in the law itself, confusion due to the technicality of the law, or potentially to the lack of infrastructure necessary to support compliance.
- Lack of willingness to comply, which generally falls to those who perceive the law to have little substantive purpose in itself, or in its administrative processes. This may also occur when enforcement is perceived as being heavy-handed, disproportionate or unfair.
- Economic imperatives. The minimal margins and competitive nature of the heavy vehicle industry may lead to cuts in costs associated with compliance, be it through cuts to maintenance budgets, speeding, or manipulating work and rest hours.
- Opportunism, which may occur when a regulated party simply believes they can get away with not complying. Where their chances of detection are slim, opportunistic parties may risk non-compliance.
- Determined recidivism occurs in a section of the regulated population that makes a deliberate decision to not comply with the law. Limited research is available relating to these parties within the heavy vehicle transport arena, however anecdotally frustrations have been expressed with ‘phoenix’ companies that re-emerge after being forced out of the industry.

4.1 Determining motivation: the problem of intelligence

Responsive regulation seeks to address non-compliance in a manner that is both mindful of and proportionate to the motivations of the regulated party. However, the ability to do so in an effective and efficient manner is reliant on the quality and availability of intelligence.

4.1.1 Sufficiency of and access to information

The ability to make educated deductions about the motivation of non-complying parties relies on sufficient, timely and accurate intelligence. This is the key to being able to meaningfully differentiate between parties in the supply chain and respond appropriately.

For road and transport authorities, as well as enforcement agencies, credible information and intelligence allows them to better target their resources to achieve the best outcomes in the most economical manner. The ability to take a more sophisticated approach to compliance and enforcement relies on accurate information about vehicles, drivers, operators, other supply chain parties, as well as road conditions. There are two priority areas that require addressing; first, the sufficiency of information, and second, access to information.

Currently there is no agreed national protocol on recording information including intercept outcomes, accidents and incidents, nor consistency in the definition and identification of defects. As an example, defect rates compared in the various states and territories differ significantly.

Even if a consistent, accurate and credible system of intelligence was available nationally, the question of how each state, and how each agency within a jurisdiction, shares its information would

---

14 It is acknowledged that ‘intelligence’ has several potential meanings and can be tactical, operational and strategic. It is used here in its broad, general sense.
15 For a report on the data that is currently collected across the jurisdictions see Austroads Research Report Heavy Vehicle Safety Data (AP-R441-13), June 2013.
remain. Privacy laws, cultural and legacy issues may potentially impede or slow the timely exchange of information. Consequently intelligence sharing between agencies and across borders has often occurred on an informal basis. A national intelligence system will require a fresh approach to information sharing developed in consultation with all parties, with the particular sensitivities for the police acknowledged.

The NHVR represents a unique opportunity to develop a genuinely information sharing protocol for heavy vehicle related intelligence.

4.1.2 Stakeholder feedback

This finding on the need for greater intelligence sharing received support from stakeholders in their response to the Consultation Draft. However, it was noted by the Northern Territory Department of Transport that consideration should be given to ensuring this does not increase the burden on jurisdictional agencies. Additionally, the South Australian Department of Planning, Transport and Infrastructure (DPTI) noted potential merit in promoting the national use of Truckscan.

Finding 1: (i) That the National Data Strategy being developed by the NHVR is critical as a means of collecting, assessing and leveraging intelligence to enable meaningful differentiation between operators and other parties; (ii) that an intelligence-sharing protocol would facilitate appropriate data collection. This protocol could be developed by the NHVR in consultation with relevant stakeholders.

---

16 It is worth noting that Tasmania appears to have circumvented some of the common inter-departmental information exchange frustrations. In Tasmania, although the police ‘own’ vehicle crash data DIER officers are the ‘custodians’. Thus DIER officers are responsible for the collection and analysis of vehicle crash data, resulting in the publication *A Review of Casualty Crashes Involving Heavy Vehicles in Tasmania* (2010). Department of Infrastructure, Energy and Resources (March 2010), *A Review of Casualty Crashes Involving Heavy Vehicles in Tasmania*, p. 9.

17 Truckscan is currently in use in NSW and is an intelligence system that allows screening and rapid evaluation of vehicle risk against pre-determined criteria. This criterion includes mechanical information, regulated mass and dimension limits and compliance history.
5. Achieving compliance

The capacity of an individual to comply with a law can be improved by clear, consistent and audience-appropriate instructions. The HVNL is a major step forward in unifying heavy vehicle legislation across state and territory borders. However, the HVNL operates within a broader legislative context that places other obligations on participants within the heavy vehicle industry.

5.1 Consistency of compliance across legislative requirements

Regulatory obligations for drivers, operators and other parties within the heavy vehicle industry are not limited to those within the HVNL. In addition, these parties may need to demonstrate compliance with laws relating to work, health and safety (WHS), dangerous goods, animal welfare and food handling. This may lead to frustrations associated with real or perceived duplications or contradictions in meeting different regulatory requirements.

The Chain of Responsibility Review considered the interaction between the provisions of the HVNL and those of WHS legislation. There may be merit in a project to consider further the consistency between the HVNL and other legislation.

5.1.1 Stakeholder feedback

Some support was received for a project examining the consistency between these laws, particularly from NatRoad, the Australian Fleet Management Association (AFMA) and Gas Energy Australia. However, the Northern Territory Department of Transport and the National Farmers Federation (NFF) expressed concern over the potential costs and time required for such a project.

The Australian Livestock and Rural Transporters’ Association (ALRTA) and Australian Logistics Council (ALC) did not support such a project, given the need to consider the separate purpose of each legislative regime and the risk of ‘descending to a lowest common denominator’. The Australia New Zealand Policing Advisory Agency (ANZPAA) did not support the proposal on the grounds that it was unclear how this would promote road safety outcomes.

Finding 2: That there is a need to examine potential overlaps between the HVNL and dangerous goods, animal welfare and food handling legislation. The NTC will assess this as a candidate project in developing forward work programs.

5.2 Education and persuasion

Most people are inclined to comply with the law if given sufficient, accurate information. The HVNL does not explicitly mention an educative function, but it does charge the NHVR with the identification and promotion of best practice methods for complying with the law; and for these best practice methods to encourage and promote safe and productive business practices.

5.2.1 General Education

Education is a necessary component of the role played by transport authorities, and is designed to promote compliance across the industry and provide a forum for advice and assistance. The NHVR has a unique opportunity to bolster this effort through providing a one-stop-shop for assisting industry parties. In addition, there may be value in identifying and engaging with key sectors that may not be aware they are subject to the heavy vehicle laws.

---

18 It is noted that Western Australia and the Northern Territory have not adopted the HVNL, however, they have been open to discussions with participating jurisdictions and the NHVR.
19 Section 659(2)(i)(j)(k) of the HVNL.
20 That education formed a key part of their role was agreed by the majority of transport officers and some police interviewed for the Consultation Draft.
5.2.2 Stakeholder feedback

Stakeholders were supportive of an educational role for the NHVR, however AFMA supported this ‘on the proviso that other views are not excluded’, and the NFF supported the concept through the provision of education via peak bodies.

Finding 3: That the education role of the NHVR for industry, including individual industry sectors, will be critical to improving compliance.

5.3 Improvement notices and formal warnings

The Road Transport Reform (Compliance and Enforcement) Bill introduced improvement notices and formal warnings, as sanctions for compliance and educative purposes. Both have been adopted in the HVNL. However, the use of these has been minimal.

Under section 572, improvement notices can be issued when an authorised officer believes a road law is being or is likely to be contravened. The contravention is to be remedied within a set time frame. Failure to remedy is an offence but the initial contravention is not; improvement notices provides the opportunity for remedial action without threat of punishment.

Under section 590, formal warnings provide an alternative sanction where a party has taken all reasonable steps to prevent a breach and was unaware of it. A formal warning can only be employed where it is proportionate to the offence. It can be withdrawn within 21 days and an infringement issued or court proceedings instituted instead.

The use of improvement notices and formal warnings requires an enforcement officer to decide whether these or another tool is appropriate based on some knowledge of the operator’s compliance history and technical knowledge of heavy vehicles. The power to issue improvement notices is currently limited to those officers approved to do so.

Where they are used, improvement notices and formal warnings are considered by enforcement officers to be effective intervention strategies. However, the use of these tools is limited to pre-approved officers, which may pose challenges for the NHVR to promote ‘a nationally consistent approach to enforcing contraventions of laws involving heavy vehicles’. Only two police forces, South Australia and Victoria, have opted to use improvement notices.

There is an opportunity for the NHVR, in consultation with police and transport authorities, to develop guidelines improvement notices and warnings for all authorised officers. This may require an intelligence mechanism capable of tracking and following up issuance of notices, and sharing of information with authorised officers in other states. Without this, it is difficult to enforce the consequences of non-compliance with these notices, which compromises their effectiveness.

5.3.1 Stakeholder feedback

Developing guidelines on improvement notices and formal warnings received support from stakeholders. However, ANZPAA and the NHVR noted the operational independence of the police, with ANZPAA further noting that it supported the proposal as it pertained to all road and police agencies. Transport for NSW (TfNSW) suggested a first step would be to investigate where guidelines would be appropriate. Gas Energy Australia recommended that information such as

21 AFMA submission to the Consultation Draft, dated 1 November 2013, p 4.
22 Page 45 of the Consultation Draft contains some, however limited, figures in this respect.
23 Generally not more than seven days.
24 Therefore formal warnings are not available for substantial or severe contraventions of mass, dimension and loading requirements, for example.
25 Police officers must have the police commissioner’s written authority, while a transport authorised officer’s instrument of appointment must provide the ability to do so.
26 HVNL s 659(2)(l)
27 It is noted that when introducing compliance and enforcement sanctions in 2010, Queensland Police Service made the conscious decision to maintain their verbal warning regime rather than adopt these tools (advice from the Department of Transport and Main Roads, April 2013).
defect type and timeframes be considered in any guideline, as well as considering whether an administrative review mechanism, other than legal challenge, might be made available.

Finding 4: That guidelines on the use of improvement notices and warnings for all authorised officers (i.e. transport officers and police) would facilitate greater use of this important tool.

5.4 Published compliance policies

The publication of compliance policies can aid both enforcement agencies and industry in understanding the powers available under the HVNL, when and how they should be used and what they are designed to achieve. Further, these types of policies can refine expectations of treatment where these powers are invoked and how decisions may be appealed.

A key function of a compliance and enforcement policy is to establish where and how a compliance response – that is, an educative or persuasive intervention, differs from an enforcement response – a more punitive intervention.

While the NHVR is in a position to develop compliance and enforcement policies applicable to transport authorised officers, it is acknowledged that police are operationally independent. Any divergence between the police and transport officers may compromise the consistency of enforcement and the willingness of regulated parties to comply. For this reason, where appropriate, the coordination of approaches should be encouraged.

5.4.1 Stakeholder feedback

Support was received from stakeholders in relation to the publishing of a compliance and enforcement policy. However, the Northern Territory Department of Transport’s support is on the basis that consultation with industry and jurisdictions take place during the development process and operating environments in regional and remote areas are considered. The NFF noted that any policy should produce tangible benefits for industry and not simply reflect bureaucratic processes.

ANZPAA considered it might be more appropriate to develop guidelines rather than a policy. It noted that while police are willing to participate in the development process they would not be bound by resulting guidelines or policies, which would only apply to transport authorised officers.

The ALC noted that the NHVR’s publication of such guidelines is imperative and proposed the amendment of section 653 (Approved guidelines for exemptions, authorisations, permits and other authorities) to allow the Council to make approved guidelines with respect to compliance and enforcement.

Gas Energy Australia noted the need to ensure any existing jurisdictional policies on compliance and enforcement be removed when the national policy is implemented, so as to avoid confusion for industry.

Finding 5: That a published NHVR compliance and enforcement policy would help clarify expectations of industry and improve consistency.

5.5 Publishing enforcement outcomes

Publishing enforcement activity outcomes publicises that offenders are being dealt with, and may encourage self-regulation for law-abiding regulated parties. It may also remind opportunistic non-compliers of the reality of the risk of prosecution.

In addition to publishing general information and data on enforcement, the high profile nature of some prosecutions has the potential to impact on the reputation of both the industry and its participants, providing a further deterrent for non-compliance. It may also provide lessons for industry on standards of compliance.
5.5.1 Stakeholder feedback

Stakeholder responses to publishing enforcement outcomes were varied. Support was received from the ALRTA, Toll Group, AFMA, UNSW and the NHVR. The NHVR noted that there may be benefit in also publishing data on enforcement activities, including the use of particular enforcement tools by jurisdiction and by offence.

The Northern Territory Department of Transport and Gas Energy Australia did not support the proposal, with the former noting the potential increased burden on jurisdictions to provide data they may not currently collect. Both respondents noted the need to de-identify information prior to publication.

DPTI did not explicitly express support or otherwise for this finding, however it expressed some concerns in relation to the potential costs. It noted that there is a risk that the small number of prosecutions and generally low penalties may reduce the overall effectiveness of the national regime. Further, care should be taken in relation to how much information is disclosed and associated costs should not be underestimated.

DPTI further noted that without data from police, who also undertake enforcement activities, the overall picture would be incomplete. Additionally, it noted the need to comply with part 13.4 (Protected Information) of the HVNL on dealing with information that is protected under the law.

Finding 6: That where possible enforcement data (including on improvement notices, warnings, infringements, defect notices and directions) and the outcome of prosecutions should be collected and published.
6. Gateway and preventative mechanisms

Australia does not require operator licensing or accreditation. However, there are prohibitions on entry that may be considered de facto licensing regimes for industry participants, which include graduated driver training and licensing, vehicle standards, and economic operator licensing applicable to particular sectors of the industry. The National Heavy Vehicle Accreditation Scheme (NHVAS) may be considered a gateway and preventative mechanism for alternative compliance.

6.1 National Heavy Vehicle Accreditation Scheme

The NHVAS is an audit based system where admission and monitoring of the scheme is undertaken by external auditors appointed and selected by the RABQSA. Auditors are required to demonstrate relevant competencies before they are certified. They are responsible for the entry audits that grant applicants initial accreditation for two years, and scheduled and ongoing audits as required by the scheme. Operators employ auditors sourced from an approved list. When an auditor has carried out two consecutive audits on an operator, a different auditor must be used for the next audit.

The current incarnation of NHVAS is not considered optimal. A number of deficiencies have been identified including the perception that lenient auditors are easily accessible, with some operators reportedly recommissioning audits where the initial results may not have been in their favour. Although participants have the option to advise the accrediting body of any conflicts of interest or performance issues associated with an auditor, there was no evidence found of an auditor’s authority having been revoked.

Perceived weaknesses in the scheme’s quality control have meant that it may not have achieved the goal of reducing on-road enforcement for scheme participants. The results of a 2009 survey found that operators with NHVAS maintenance accreditation received more defect notices than companies not accredited. A similar result was found by TfNSW in its 2012 roadworthiness survey. The return of direct control of the NHVAS auditing function to the NHVR may provide enforcement agencies with sufficient confidence to honour this original policy intention.

6.1.1 Stakeholder feedback

Stakeholders were supportive of the need to reconsider the oversight and control of the NHVAS scheme.

Finding 7: That NHVAS governance structures may benefit from strengthening NHVR oversight and control of the NHVAS audit function, in consultation with relevant agencies. Note, any changes would be subject to ministerial approval and the current Heavy Vehicle Roadworthiness Program being undertaken jointly by the NHVR and NTC will inform future improvements.

---

28 The body of auditors formed by the merger of the Registrar Accreditation Board and the Quality Society of Australasia.
29 As reported by an industry peak body August 2011.
31 Advice provided by NSW in response to the Government only draft, dated 15 April 2013.
7. Enforcement tools

7.1 Infringements

Of the 330 offences within the HVNL, 140 are subject to penalty notices (infringements). These offences are generally considered to be less serious, while the more serious offences require direct court involvement. Infringements are an efficient enforcement mechanism in that they:

- provide an alternative to costly and lengthy court proceedings;
- give recipients the option to pay an infringement of lesser value than would potentially be handed down by a court (HVNL infringements are set at 10 per cent of the maximum court imposable penalty);
- fulfil a requirement of regulatory best practice, that of immediacy and proximity to the occurrence of the offence; and
- are attractive to enforcement agencies, partly because they are quantifiable and lend themselves to demonstrations of productivity.

Infringements aim to deter and to punish, and as a visual mode of enforcement, play an important role in general deterrence. They form a key part of on-road enforcement efforts, which have been instrumental in changing community attitudes towards a number of road safety issues. However, monetary penalties are generally considered to be the least effective tools of rehabilitation and community protection.\(^\text{32}\) Additionally, their effectiveness as a specific deterrent tends to be assumed, as there is limited evidence to support this position.\(^\text{33}\)

Offences where infringements may be issued are traditionally those with strict liability.\(^\text{34}\) From a responsive regulation point of view, infringements are problematic. Due to the absence of the need to establish intent or interpret actions they are largely indifferent to the motivation of the offender. In general, the same penalty applies regardless of whether the offender has a sustained pattern of non-compliance or has made an inadvertent error.\(^\text{35}\) This contributes to the view held by some industry participants that infringements can be unjust and unfair. An enforcement officer may of course take these factors into account in deciding whether to issue an infringement or whether another enforcement tool is more appropriate.

There are a number of inherent risks associated with infringement notices, which could compromise their effectiveness.

- Although the option to challenge an infringement in court exists, this may be nominal. Court attendance may represent costs beyond the monetary fine, and there may be difficulties where the defendant resides outside of the jurisdiction of issue. In these cases, even when the defendant feels the infringement is incorrect, they may still elect to pay to avoid further expenses.
- A widespread perception that drivers can be infringed for minor mistakes or errors in their fatigue log books has led to a general grievance relating to infringements. Although little or no evidence to this effect has been found, the fear of infringements remains.
- The perception exists that infringements represent a soft approach to enforcement and avoid the more systemic problems that might require chain of responsibility investigations. This has generated concerns about equity and fairness around infringements and extended liabilities to other chain parties.
- It is commonly perceived that infringements are used as a revenue raising mechanism rather than an effort to address dangerous behaviour. The attraction of infringements as neatly quantifiable demonstration of productivity needs to be acknowledged. Regulators


\(^{34}\) That is, where the one offence is clearly observable and attributable.

\(^{35}\) Which may indicate intent.
and enforcement agencies need to be mindful of this as a perception, even if it is not necessarily the reality.

If drivers and operators believe infringements to have no substantive road safety or equity purpose, the behavioural impact of these as enforcement tools is reduced. As a result, self-regulation may decline.

The publication of a compliance and enforcement policy (as set out in finding 5) clearly establishing how infringements, in addition to other enforcement tools such as improvement notices and warnings, will be used may help address scepticism from the public and industry. The NHVR is in the position to promote consistency in enforcement approaches through tracking the issuance of infringements against offences and through reporting on internal and judicial reviews of infringements. The Consultation Draft recommended further investigation into recidivism and greater reports on infringements.

7.1.1 Stakeholder feedback

Further investigation of recidivism among those issued with infringements was supported by the ALRTA, Toll Group and Gas Energy Australia. The Northern Territory Department of Transport expressed support, however noted it does not have an infringement system in that jurisdiction, and the NHVR supported the recommendation, noting consideration of timing and resources that may be necessary. In indicating support for the proposal, ANZPAA suggested extending the scope to include court penalties, while TfNSW suggested the inclusion of habitual non-compliance in addition to recidivism. This detail may form part of the development of the study methodology or terms of reference and there may be opportunities for collaboration between agencies.

In relation to tracking and reporting of infringements, stakeholders largely indicated support for this finding. The NHVR did note that the timing and implementation needs to take into account resourcing and other priorities. ALRTA supported the finding and argued that the NHVR should have a formal role in reviewing infringements. ANZPAA’s position on this finding was not clear; however it noted that it ‘would be interested to see the proposed process which would enable the NHVR to achieve this [finding]’. 36

Finding 8: That there is a need for further research on the extent of recidivism among persons issued with infringements under heavy vehicle law. The NTC will assess this as a candidate project in developing forward work programs.

Finding 9: That tracking and public reporting on issuing infringements by offence, and on the outcomes of internal and judicial review of infringements, would provide greater transparency over the use of infringements and greater confidence that they are being used appropriately.

7.2 Court imposable penalties

The HVNL provides a range of court-imposable penalties capable of punishing and deterring more serious offenders, which have been incorporated into the HVNL. Court offences are likely to capture those who are less willing to comply, the commercially-motivated, recidivists and those who wish to contest an infringement notice. Courts can impose financial penalties that recognise the benefits that might be accrued by economically motivated offenders and to compensate road owners. Courts may restrict operations and impose conditions designed to enhance safety and equity. Finally, they have the power to prohibit the worst offenders from operating.

Transport authorised officers, police and their prosecution teams report frustrations with the perceived unwillingness of courts to impose penalties at or towards the maximum penalties under the law. Advice from Victoria suggests that courts impose less than three per cent of the available maximum. This figure does not consider the opportunity cost associated with court attendance, 36 ANZPAA submission to consultation review 11 November 2013.
which might be considered by a magistrate. Similar frustrations and evidence of low penalty outcomes have been found in other studies.

It is unlikely that court fines pose an effective deterrent if it is reasonable for the defendant to expect a lesser fine, even where they plead guilty, compared to the infringement amount. This may influence the decisions of enforcement officers.  

7.2.1 Stakeholder feedback

While supported for the most part, stakeholders suggested caution in undertaking further research in this area. TfNSW noted the need to acknowledge the independent role of the judiciary. AFMA supported the recommendation, however did not support over-emphasis on speeding offences, as other non-compliant behaviours equally require appropriate penalty responses.

Finding 10: That there is a lack of data surrounding court imposed fines and the reasons behind those fines. This could be rectified by a study of heavy vehicle penalties imposed by courts, to better understand the reasons behind the imposition of particular penalties. The NTC will assess this as a candidate project in developing forward work programs.

7.3 Non-monetary penalties

In addition to direct monetary penalties, the HVNL permits the courts to issue a number of other compliance and enforcement tools. These include:

- Commercial benefits orders, which consider the potential benefit that could be derived from non-compliance, noting that the benefit does not have to be monetary.
- Compensation orders, which require an offender to pay a road authority compensation reflective of the loss or damage to infrastructure resultant from the offence.
- Supervisory intervention orders, which may require a convicted party to do particular things that the court considers will improve that party’s compliance.
- Prohibition orders, reserved for the most serious offenders. These prohibit an individual from having a particular role or responsibility associated with road transport.

Only NSW and South Australia have reported issuing commercial benefits orders, and only one each. The lack of methodology for calculating gross benefits has been presented as a reason for their minimal use. Further, legal and administrative burdens associated with preparing and applying for orders may act as disincentives for their use.

The issue of compensation orders is potentially hampered by the lack of sufficiently equipped personnel or resources to calculate the necessary compensation. It is noted that public authorities seeking compensation orders must provide a certificate to the defendant at least 28 days prior to the court hearing, which may also prove prohibitive.

Supervisory intervention orders require a court to consider the offender’s motivation and to be satisfied that the order will improve their ability or willingness to comply with the requirements of the law.  

NSW appears to be the only jurisdiction to have issued supervisory intervention orders; even then it has only issued 13. The lack of familiarity with intelligent transport systems is a potential reason for the minimal use of this tool.

---

38 Section 601 of the HVNL.
40 NTC, Electronic systems for heavy vehicle driver fatigue and speed compliance, policy paper, March 2011, p.2.
Only one prohibition order has been issued, again by NSW, despite the expectation that between six and 12 orders would be issued annually.\footnote{Jaguar Consulting Pty Ltd, 2003, p. 38.}

This information suggests there is a lack of familiarity with these sanctions, which is hindering their use and effectiveness. Guidelines on:

- how and when to use these enforcement tools
- how to calculate commercial benefits or compensation orders
- what might be appropriate for a supervisory intervention order, and
- where a prohibition order may be justified

would benefit both those regulated parties and enforcement agencies.

### 7.3.1 Stakeholder feedback

Developing guidelines on when and how to use these compliance and enforcement tools was supported by stakeholders. However, ANZPAA reiterated the discretion and independence of policing agencies with respect to any guidelines published.

---

**Finding 11:** That the full set of enforcement tools available under the HVNL would be better utilised if there was greater guidance available. In particular, guidelines should be developed on:

- gross commercial benefits orders, including how they may be derived;
- compensation orders, including how they may be derived;
- supervisory intervention orders, including their purpose and use; and
- prohibition orders, including their purpose and use.
8. Chain of responsibility

Chain of responsibility (CoR) is designed to ensure that any party in a position to control, influence or encourage particular on-road behaviours is identified and held appropriately accountable. It recognises the on-road effects of actions, inactions and demands of off-road parties in the transport supply chain.

The impact of CoR investigations on on-road behaviours has been demonstrated by efforts in NSW where the number of 12 tonne-plus vehicles detected travelling over 105km/h significantly reduced between January 2011 and November 2012. This was due to the combined use of education (seminars and workshops), targeted operations and specific technology.

The CoR provisions of the HVNL has recently been reviewed by a taskforce of government and industry representatives. While there is general agreement about the importance of the regime, the review is considering opportunities for its improvement.

The consensus amongst stakeholders – government and industry – is that CoR investigations should form part of the NHVR’s ongoing compliance effort. In order to properly undertake CoR investigations, the NHVR should ensure that its investigative unit is appropriately equipped, both in terms of skill set and resources. Further, introducing the HVNL means that the NHVR is uniquely able to conduct cross-border CoR investigations.

8.1.1 Stakeholder feedback

The institution of a well-resourced CoR investigations unit within the NHVR was supported by most stakeholders. The ALC noted the importance of ensuring commitment from the jurisdictions for the provision of necessary funds to the NHVR to allow this to occur. The ALC further noted that, given industry funds the NHVR’s enforcement function, the service level agreements between the NHVR and jurisdictions should be published to give industry clarity around what they are paying for.

Support was received for a focus on cross-border investigations. However, ANZPAA noted that there are logistical issues in cross-border investigations that would require greater definition or direction.

Finding 12: That there would be a benefit in a strong focus being taken by the NHVR on Chain of Responsibility investigations, including:

- ensuring appropriate resources are available to CoR investigations;
- pursuing the recommendations of the CoR Review; and
- examining opportunities for, and barriers to cross-border CoR investigations.
9. Other issues of note

The Consultation Draft contains significant detail on the issues for which findings have been articulated in this Final Report, as well as in relation to related concepts pertinent to compliance and enforcement. The Consultation Draft also details a number of allied projects being pursued by the NHVR and the NTC, which have an impact on compliance and enforcement outcomes.

9.1 Technology for compliance

The Consultation Draft considers that the use of technology for compliance should be actively encouraged by regulators. This includes developing user-friendly tools that can clearly demonstrate to users what compliance should look like. Other opportunities include the use of telematics, such as electronic work diaries, to reduce industry’s regulatory burden. It is noted that a number of policy issues exist with respect to the use of telematics and similar tools for compliance and enforcement purposes. A project investigating the use of telematics is being pursued by the NTC.

9.2 Incentives and rewards

The Consultation Draft considered a number of options for incentivising and rewarding compliance. These took inspiration from existing schemes including fuel tax credits currently offered to diesel trucks and buses, and registration and licensing concessions offered by various states to drivers with good driving records. The use of government grants for employing experts to advise industry is considered as a potential incentive for compliance, as is insurance premium reductions for ‘better risk’ clients, which could be considered by jurisdictions with compulsory third party insurance schemes. There was not broad support amongst stakeholder feedback for further incentives and rewards at this time.

9.3 Western Australian Approach to Fatigue

The Consultation Draft included a recommendation that Western Australia amend its current approach to fatigue, however this did not receive broad support.
10. Stakeholder responses

The following parties made submissions to the *Heavy Vehicle Compliance Review Consultation Draft*.

- Australian Logistics Council (ALC)
- Australian Livestock and Regional Transporters Association (ALRTA)
- Australia New Zealand Policing Advisory Agency (ANZPAA)
- Australian Fleet Management Association (AfMA)
- Australian Trucking Association (ATA)
- Chris Walker, University of New South Wales
- Department of Planning, Transport and Infrastructure, South Australia (DPTI)
- Department of Transport, Northern Territory
- Gas Energy Australia
- Greg Killeen (Individual)
- John May (Individual)
- Main Roads Western Australia
- National Farmers’ Federation (NFF)
- National Heavy Vehicle Regulator (NHVR)
- National Measurement Institute
- NatRoad
- Road to Safety
- Toll Group
- Transport for NSW (TfNSW)
- Warren Stalder (Individual)

All submissions have been published on the NTC’s website at:
11. References


Karp, J, ‘Conversations with Truckies: Looking at Life through Glass’, presentation to the National Transport Commission, 8 August 2012.


