



Queensland
Government

Office of the
Director-General

Department of
Transport and Main Roads

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29 OCT 2014

Mr Paul Retter AM
Chief Executive and Commissioner
National Transport Commission
Level 15 628 Bourke Street
Melbourne Vic 3000

Principal Officer
ELVA/REH
07 NOV 2014
RECEIVED NTC
Response Due

Dear Mr Retter *Paul*

Thank you for the opportunity to comment on the discussion paper "Access to PBS mass limits for truck and trailer combinations" (the Paper).

The Department of Transport and Main Roads (TMR) has reviewed the paper and considered the four proposed Options canvassed by the National Transport Commission (NTC), noting the preferred option from the NTC is Option 4 "Develop a specific envelope".

Option 4 proposes limiting bin heights for high density products to ensure vehicle stability. As a significant part of the industry requires the flexibility to load various types of bulk commodity, this approach would, in turn, limit the application of this initiative to very specific freight tasks.

Under this option, eligible vehicles would be removed from the Performance Base Standards (PBS) framework entirely. TMR is not in favour of this approach as coverage of the PBS scheme provides significant risk mitigation for these safer and highly productive vehicles.

TMR's preferred option is Option 3 "Develop a PBS-compliant blueprint". I consider this option represents the best balance of providing productivity and efficiency benefits for industry while providing for the protection of infrastructure and ensuring the safety of all Queensland road users. This Option will also ensure the integrity of the current PBS scheme is maintained.

Option 3 requires that vehicles undergo a detailed inspection by a certified PBS assessor prior to a PBS final approval being issued by the National Heavy Vehicle Regulator. This will provide certainty that eligible vehicles have been built to the PBS blueprint and comply with PBS standards. TMR would not support any Option that was entirely reliant on random roadside inspections as a measure of compliance to design standards.

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I have asked Mark Mitchell, Director, Compliance and Heavy Vehicle Reform, to be the TMR representative and work with the NTC to progress this initiative.

If you require any further information, I encourage you to contact Mr Mitchell on 3066 1249 or email at mark.m.mitchell@tmr.qld.gov.au.

Yours sincerely



Neil Scales

Director-General
Department of Transport and Main Roads