

In reply please quote :

Your Reference :

17 March 2015

Heavy Vehicle Roadworthiness Program Manager
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000

Dear (Heavy Vehicle Roadworthiness Program Manager)

Heavy Vehicle Roadworthiness Program, Consultation Regulatory Impact Statement - ARRB submission

This RIS appears to make the assumption that inspection, with the aim of detecting vehicle defects, is the principal method by which roadworthiness should be achieved through regulation. The four options for regulatory action present a range of solutions which rely, to varying degrees, on vehicle inspection with the aim of detecting defects and ordering their rectification.

ARRB's view is that the aim of any action should be to reduce the number of un-roadworthy heavy vehicles operating on Australian roads, thereby addressing the proportion of crashes to which vehicle condition is a contributor. An improvement in vehicle roadworthiness need not rely solely on inspection and detection of defects. Inspections should comprise a component of the total roadworthiness system, but as pointed out in the RIS, it is unlikely that sufficient capacity exists to achieve a substantial increase in vehicle inspection rates.

It should be possible to build roadworthiness monitoring into regular vehicle maintenance, using the time and expertise of vehicle mechanics to inspect vehicles during servicing. This is touched on in Section 5.4.4 and 5.4.6 of the RIS, where changes to the HVNL are proposed to allow the NHVR to mandate maintenance management for certain vehicle classes. If the idea were expanded to involve the majority of the fleet, roadworthiness could move from being inspection-reliant to being fully integrated with operators' maintenance regimes. The degree of internal and regulatory scrutiny on each operator's vehicles could align with the type of vehicle and its likely risk of vehicle-related crashes, as discussed in Section 5.4.4.

Audits of maintenance procedures, combined with a similar level of inspections to that achieved at present, would help to encourage adherence to the scheme. Failure to maintain vehicles in accordance with previously agreed levels of roadworthiness would place operators at risk of a mandatory increase in inspections by authorities.

It is ARRB's view that if the RIS were to be re-considered from the point-of-view of achieving an industry-wide improvement in vehicle maintenance with a focus on roadworthiness, crashes caused by vehicle condition could be reduced without a need for increased inspection rates.

Yours sincerely
Gerard Waldron



Managing Director
ARRB Group Ltd