

The MTA SA is a representative employer organisation with member businesses in Commercial Vehicle Building, Heavy Vehicle Sales, Repair and Servicing together with relevant parts and accessory suppliers and fitters and Heavy Vehicle Collision Repairers.

The majority of these groups are members of the CVIA SA (Commercial Vehicle Industry Association of SA), a trade division within MTA with links to/representative members of CVIA of A, whilst others fall within other trade divisions.

MTA's representative interests therefore relate to the supply, service/repair and component manufacture of all heavy vehicles from 4.5 tonnes upwards.

South Australia is a mainland state without any prescribed system of inspection of heavy vehicles outside of a mass maintenance scheme. Vehicles outside of mass maintenance schemes are not subject to any regular inspection of roadworthiness or at transfer of ownership. In practical terms this means that most vehicles will never be subject to any form of roadworthiness check other than a random roadside inspection by DPTI or SAPOL.

Our working knowledge of this subject gives us a confident perspective on its relevance to the Heavy Vehicle Roadworthiness Program options.

In summary of the Options discussed:

- Doing nothing is not an option and therefore we oppose options one and 2. Option 1 maintains status quo and option 2 is largely informational. Option 2 measures are also included in options 3 and 4 anyway.
- We would prefer Option 4 because it provides for mandatory inspections, However it contains a clause relating to chain of responsibility which is unacceptable to the industry because it extends liability to the supply chain (5.5.1) for situations outside their control. Unless that clause is excised we have no choice but to oppose option 4 even though members support the mandatory component. If the clause is removed option 4 is probably the best.
- In the absence of achieving the construction we would like in relation to option 4 we would support Option 3 which provides for regulatory recognition as opposed to prescription. It enables a risk management approach to be applied whilst not perfect as any benefit is dependent on the manner in which the option is implemented, it is better than assuming the risks contained in option 4. Option 3 amends the HVNL to allow the NHVR to require nominated heavy vehicles and classes of heavy vehicles to submit to scheduled inspections. This will lead to further steps in the process involving creation of criteria relating to the 'which and when' of inspections. These steps should also involve a consultation process as variations to targeting and frequency will result in very different outcomes (and vary between the states).