



20<sup>th</sup> March, 2015

The Heavy Vehicle Roadworthiness Program Manager  
National Transport Commission  
Level 15, 628 Bourke Street,  
Melbourne, VIC, 3000  
Submissions to: [www.ntc.gov.au](http://www.ntc.gov.au)

**Subject: TIC submission to the National Transport Commission and National Heavy Vehicle Regulator's; Heavy Vehicle Roadworthiness Program Consultation Regulatory Impact Statement, released 23<sup>rd</sup> January 2015**

The Truck Industry Council (TIC) is the peak industry body representing manufacturers and distributors of heavy commercial vehicles (that is, with Gross Vehicle Mass above 3,500 kg) or “trucks” in Australia. TIC members are responsible for producing or importing and distributing 17 brands of truck for the Australian market, totalling more than 25,000 new units sold each year.

Further, TIC also comprises two dedicated engine manufacture members and one dedicated driveline manufacture member who supply major systems for both on highway and off highway “truck” applications.

The Truck Industry Council has as one of its core values the stated belief that all heavy vehicles (trucks) should be maintained to the Original Equipment Manufacturers (OEM) specifications at all times. This being an effective method of ensuring that a truck is roadworthy and fit for use on public (or private) roads. To this end TIC has always supported mandated annual heavy vehicle roadworthiness inspections, carried out by a jurisdictional, or jurisdictional accredited, inspector/s. However TIC does have a concern with the latter approach. Too often some accredited heavy vehicle roadworthiness schemes have been found wanting in their responsibilities and deliverables to ensure that trucks within their scheme are roadworthy. TIC does however acknowledge that risk based approaches, as detailed in Options 2 and 3 of the HV Roadworthiness Program RIS, are a valid method of monitoring heavy vehicle roadworthiness and these methods may one day replace a mandated inspection regime. TIC calls for a cautious approach to this critical area of truck safety and argues that until it can be proven that risk based management of heavy vehicle roadworthiness alone can effectively deliver the safety outcomes that government and society desire, national annual heavy vehicle inspections must form part of any national scheme for truck roadworthiness. Hence the Truck Industry Council supports the basic intent of Option 4 of the HV Roadworthiness Program RIS.

The Truck Industry Council has also held the long standing view that the heavy vehicle inspection regime must be consistent across all State and Territory borders, this includes inspection methods, inspection types, inspection frequency (for mandated inspections),

inspection equipment, penalties and training activities. The Truck Industry Council therefore supports the measures detailed in both Option 3 and 4, of the HV Roadworthiness Program RIS, that specifically detail the case for nationally consistent heavy vehicle inspections.

Although not specifically detailed in the HV Roadworthiness Program RIS, the Truck Industry Council wishes to draw the Program Team Manager's attention to a totally unregulated issue that directly affects heavy vehicle roadworthiness. That is, the issue of unregulated control of aftermarket spare parts. Currently no federal or state regulations or laws exist for the supply to market of aftermarket spare parts. The use of unregulated spare parts, particularly safety critical brake, steering and suspension parts is widespread in the heavy vehicle industry. Quite simply without controls on the parts used to repair and maintain heavy vehicles, roadworthiness cannot be assured. In fact, the performance level of these unregulated parts means that the level of roadworthiness of a heavy vehicle is unknown. **This is a potentially very dangerous situation.**

The Truck Industry Council requests that safety critical heavy vehicle aftermarket spare parts are subject to the same requirements as those in Europe and that UN-ECE Regulation 90 for brake components, or similar, is adopted in Australia.

I trust that you find TIC's submission useful and that the issues that have been raised in this document will be considered in the review and formulation of a nationally consistent Heavy Vehicle Roadworthiness Program and related government policy.

Please contact the undersigned, on 0408 225212 or [m.hammond@truck-industry-council.org](mailto:m.hammond@truck-industry-council.org) for any questions about this submission.

Yours faithfully,



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