



SOUTH AUSTRALIAN FREIGHT COUNCIL



9 October 2017

Attn: PBS Effectiveness Review
National Transport Commission
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Dear Sir / Madam

RE: Assessing the effectiveness of the PBS Scheme Discussion Paper

On behalf of the South Australian Freight Council's (SAFC) Executive Committee and Membership I thank you for the opportunity to comment on the 'Assessing the effectiveness of the PBS Scheme' Discussion Paper.

As you may be aware, SAFC is the State's peak, multi-modal freight and logistics industry group that advises all levels of government on industry related issues. SAFC represents road, rail, sea and air freight modes and operations, freight services users and assists the industry on issues relating to freight logistics across all modes.

Performance Based Standards has proven a significant regulatory innovation which in principle is strongly supported by the road freight industry, peak bodies and operators, including SAFC. Whilst improvements are required to make it simpler and less cost prohibitive, the scheme itself fosters innovation and the development of unique combinations which are better suited to specific freight tasks, improving productivity.

The complexities of the current scheme, network access limitations and cost of the approval process have all been identified as major barriers for the road freight industry. In SAFC's opinion, uncertainty surrounding the network has been the main contributing factor as to why the PBS scheme has not seen stronger uptake.

SAFC contends that comparable standard combinations and PBS combinations should have equal access to the road network. This supports the underlying principle of PBS – that a vehicle should be judged on performance, not looks. For example, Double Road Trains have access permissions separate from the equivalent PBS3A network, and have greater access to the road network than the equivalent PBS3A vehicles that perform as well as, or better than a DRT.

SAFC contends that based on the evidence of comparable or improved safety of PBS vehicles over standard combinations, those networks should be merged. Thus, for example, PBS3A, Double Road Train and B Triples would have access to the same network. 'B' networks (1B, 2B, 3B) would still need to be maintained for PBS access to the network for combinations that fit in between common configurations.

We note that this position broadly matched the NTC's possible action to publish national notices for all levels of the PBS network that match equivalent prescriptive networks.

SAFC is generally supportive of further investigation of the NTC's draft actions as outlined in the discussion paper. We are not certain there is a need to develop a PBS approach for vehicles that fall in the general access category (8t – 42.5t) as suggested, but are willing to be convinced if further evidence can be presented supporting this concept.

Should you wish to discuss any element of this submission further, please feel free to contact me on (08) 8447 0664 or via email knapp.evan@safreightcouncil.com.au.

Yours Sincerely,



Evan Knapp
Executive Officer, SA Freight Council.