

25 September 2020



Dr Gillian Miles
Chief Executive
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000
Via NTC portal

GEA RESPONSE TO AUSTRALIAN LIGHT VEHICLE STANDARDS RULES AND HEAVY VEHICLE (VEHICLE STANDARDS) NATIONAL REGULATION 2020 AMENDMENT PACKAGE CONSULTATION DRAFT

Dear Dr Miles

Gas Energy Australia (GEA) appreciates the opportunity to respond to the National Transport Commission (NTC) Australian Light Vehicle Standards Rules and Heavy Vehicle (Vehicle Standards) National Regulation (HV(VS)NR) 2020 Amendment Package Consultation Draft (Consultation Draft) August 2020.

GEA is supportive of the proposed changes which however raise the question of whether the Consultation Draft 1.1.4 Tyre Tread which prohibits tyres fitted that have cleats or other gripping devices might conflict with state regulatory requirements such as the Victorian Alpine Resorts (Management) Regulations 2009¹ *Section 55 Use of wheel chains on vehicles*. In part (2) of this regulation, an authorised officer or member of the force may *direct the driver of a vehicle.....to ensure that wheel chains are properly fitted to the drive wheels of that vehicle ...* This question was raised by GEA members who require wheel chains for the purpose of safe delivery of gaseous fuels into the Alpine region of Australia.

GEA notes that the prohibition on cleats and gripping devices currently applies through HV(VS)NR Regulation 28(1) and that the purpose of the Consultation Draft is to extend the prohibition to trailers. Our members seek confirmation that the definition of a tyre does not include wheel chains and that these can be fitted as required for safety.

In summary, GEA thanks the NTC for the opportunity to comment on the Consultation Draft, supports the proposed changes and looks forward to confirmation that the definition of a tyre does not include wheel chains.

For consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a horizontal line drawn through it.

John Griffiths
CEO
Gas Energy Australia

¹ https://content.legislation.vic.gov.au/sites/default/files/7fb1400e-6e01-3fb8-85e9-0798f9d2b09c_09-136sra003%20authorised.pdf