

Good afternoon, please accept my comments on the reference points below:

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The importance of a viable, safe, sustainable and efficient road transport industry, with particular reference to:

- a) the importance of an enforceable minimum award rate and sustainable standards and conditions for all stakeholders in the road transport industry;

1) *Whilst the idea of having a minimum payment for work in the transport industry is appealing from the outside; the money paid in no way equates to provision of a safer working environment.*

i. *This can be simply explained: if driver A gets paid top money for a job or jobs or a contract – that does not transfer to dollars spent by driver A on a safe system of work or maintenance on his vehicle or vehicles.*

ii. *Unless you make it mandatory to obtain a license to operate in the transport industry (a transport business license - not a driver's license) & provide the necessary frame work to have third party audits on the safety systems of that business – the minimum award rate concept is a flawed one.*

2) *The level of transport auditor's expertise is another cause for concern – from my extended experience in the transport industry (38 years) there is a degree of tick n flick approaches to auditors. This is because the level of knowledge is often lacking & it is prevalent for transport operators to 'choose' their own auditor (doctor shopping) – bad audit practices are then reinforced back into the business & so on. The business never thinks there is a problem with their operations.*

3) **Take a look at how the RTO audit system works, the RTO council advises a range of dates to select, you don't get to select your auditor – corrective actions have 28 days to be closed out (period) & the auditor sends their recommendations to the RTO Council on whether you continue to move forward in the industry. You certainly learn to protect your RTO credentials!*

i. *The RTO audits cover all areas of the business comprehensively. They review financial (current business plan, financial report from your accountant & a bank guarantee) plus safety & operational platforms of the business against the standards.*

ii. *An approach of this nature would all but extinguish backyard operators – both transport & customers & ensure transport operators understood the fundamentals of their business – therefore certifying financial stability of the business & safe systems of work.*

- b) the development and maintenance of road transport infrastructure to ensure a safe and

efficient road transport industry;

c) the regulatory impact, including the appropriateness, relevance and adequacy of the legislative framework, on all stakeholders in the road transport industry;

d) the training and career pathways to support, develop and sustain the road transport industry;

4) Without classing Nationally a heavy vehicle driver's license as an industrial instrument:

- i. The license is not viewed by the Training Accreditation Council as a mandatory requirement to obtain via an RTO &;
- ii. The completion of formal training relating to operation of such vehicles is not mandatory – essentially drivers are learning on the job by trial & error. (See attached)
 - a. Some larger operations provide or seek out formal training for their drivers – but the majority of transport operators are small concerns & do not have the knowledge or funds to undertake such training.
 - b. Remember they are competing with other non-compliant operators so the bench mark is already low & to compete in that market – they need to be competitive.
- iii. Operators need a frame work to hang their business on - see point three* above.

e) the social and economic impact of road-related injury, trauma and death;

f) efficient cost-recovery measures for industry stakeholders, including subcontractors;

5) The use high productivity vehicles is the chasm between east & west; the political will to allow these high productivity vehicles to access the last mile is lacking.

- i. For example road trains come into Perth from the northwest right down to Bunbury – no issues here; however East-West is a different story; you drop the back trailer at Northam & proceed into Perth (approx. 100km away). Then you return to the marshalling area to collect trailer two. Effectively each trip is wasted productivity & higher cost.
- ii. More vehicles on the roads, drivers have to operate longer to achieve the same end. The public sees more trucks on the roads & pushes back on the Government and around the circle we go.

g) the impact of new technologies and advancements in freight distribution, vehicle design, road safety and alternative fuels;

h) the importance of establishing a formal consultative relationship between the road transport industry and all levels of government in Australia; and

6) See point three* above

i) other related matters.

regards,

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HEAVY VEHICLE DRIVER PROFESSIONAL DEVELOPMENT

Must be classed as an industrial instrument

Time to complete: Two years

