

**SUBMISSION TO THE PUBLIC CONSULTATION PROCESS ON THE
COMPLIANCE AND ENFORCEMENT PROVISIONS PROPOSED WITHIN THE
ROAD TRAFFIC (VEHICLES) BILL 2009**

**LIVESTOCK TRANSPORT AND COUNTRY BULK CARRIERS ASSOCIATION OF
WESTERN AUSTRALIA (INC)**

15th January 2010

BACKGROUND

1. The proposed legislation which is the subject of this consultation process is part of a suite of Bills introduced by the previous Government to give effect to a commitment made by the Australian Transport Council (ATC) to introduce model chain of responsibility laws throughout Australia. The objectives of the legislation were primarily to create legal liability along the transport chain for breaches of transport laws relating to mass, length, width, height and projection. It was accepted that these models would be modified to accommodate unique circumstances in each State. According to the publicity at the time the new laws were also intended to overcome inadequate enforcement powers such as search and entry; requiring information and an inadequate range of sanctions.
2. New South Wales, Victoria, South Australia and Queensland have already implemented reforms. The remaining states are moving towards implementation.
3. The initial public consultation was conducted by the National Transport Commission (NTC) or National Road Transport Commission as it then was. This consultation was based on the national model only as each state had not begun to consider the changes that would be necessary to implement the proposals in their jurisdictions.
4. When Western Australia began drafting Bills to implement the reforms this Association sought information from the previous Minister for Transport, the Hon. Alannah McTiernan MLC about the details of the proposals and made repeated requests for genuine industry consultation. Unfortunately despite assurances there was no consultation. The Association received a briefing from a Departmental officer on the 21st April 2006 where it was made very clear that the proposals had progressed to such a stage that modification would be difficult. There was no obvious interest in considering industry's concerns and using its collective experience to develop a better outcome, particularly with regard to the implementation of the breach regime. Although we made frequent requests we did not have an understanding of the penalty units that would be applied to breaches until the Bills were introduced to Parliament.
5. The Western Australian Government introduced five Bills to give effect to the national reforms. These were the:
Road Traffic (Administration) Bill 2007;
Road Traffic (Vehicles) Bill 2007;
Road Traffic (Authorisation to Drive) Bill 2007;
Road Traffic (Consequential Provisions) Bill 2007;
Road Traffic (Vehicles) (Taxing) Bill 2007
6. The most significant Bills in terms of the impact on our members were the Road Traffic (Administration) Bill 2007 and the Road Traffic (Vehicles) Bill 2007. The introduction of these Bills to Parliament represented the first time we had seen the detail of the proposals. It was clear that the initial concept of "chain of responsibility" had evolved into an emphasis on "compliance and enforcement". In fact that is how the suite of amendments was now being referred to. This change in emphasis is demonstrated in how the punitive measures are expressed; the search and investigation powers and the administrative framework that was being developed in the background to enforce the new provisions.
7. During the legislative debate the Bills were referred to the Legislative Council Standing Committee on Uniform Legislation and Statutes Review. This Association made a submission and gave evidence to that Committee. The submission is at **Attachment 1**. Some of the Association's concerns were agreed by the Committee but in our view it did not go far enough.
8. In September 2008 there was a change of Government in Western Australia. As several of the Bills in question had not made their way through the entire Parliamentary process the Association saw a further opportunity to raise its concerns. The Association hosted an industry forum in

October 2009 attended by representatives from the agricultural supply chain. The Forum heard from the Department of Transport and Kelly MacMillan from Corrs Chambers Wessgarth, expert transport and logistics lawyers, about the proposals. Some of the representatives from the supply chain heard for the first time about the new legal obligations they would have and it was obvious that many of them saw practical operational problems with the proposals.

9. The Minister for Transport announced in December 2009 there would be consultation on the Road Traffic (Vehicles) Bill 2009.

Terms of Reference for this Consultation Process

10. The terms of reference for this consultation process are confined to highlighted sections of the Road Traffic (Vehicles) Bill 2009. This submission is therefore confined to those sections, however, that does not mean the provisions of the other pieces of legislation are automatically endorsed by the Association.

Association’s Position

11. It is important at the outset of this submission to place the Association’s position in context and to correct some misconceptions that have arisen in recent times.
12. Firstly the Association supports the overall concept of chain of responsibility. Chain of responsibility has the potential to address a long standing tension between transporters’ obligations to comply with road laws and the pressure that is sometimes applied by consigners in particular, to carry for example heavier weights. However if chain of responsibility legislation is to be the transporter’s saviour as has been suggested in the promotion of the laws, there must not be any default positions that result in a transporter or any other member of the supply chain taking greater responsibility than others in the same supply chain. Further the penalty regime must be constructed so that individuals and companies are not subjected to frequent legal process because normal operational activities have not been taken into account in the legislative drafting process.
13. Secondly, the Association is not objecting to regulation and penalty. We acknowledge the need for penalties; our concerns relate to the circumstances, in which penalties are applied, the level of penalty for different classes of breach, the defences available to a transporter in different breach categories and the search and investigation powers (not part of this consultation process).
14. Many of the concerns expressed by the Association about this suite of laws have been dismissed on the basis that they will never come to fruition because the Departmental officers are well trained, act within guidelines and are able to use their discretion. Laws are expected to have longevity and there will be many changes of administration during the life of these laws. Our experience is that interpretations alter over the years and it is difficult to predict with certainty what the approach to enforcement will be in 10 -20 years. As far as possible the legislative drafting should, whilst retaining sufficient flexibility, leave little room for changes in emphasis on the part of regulatory authorities.

Details of Submission

15. The Association’s concerns are summarised below:

Section 47 Categories of Breach

16. A breach of mass, loading or dimension requirement is categorised as minor, substantial or severe.
17. The break points for each of these categories are:

	Minor	Substantial	Severe
Mass	Less than 105% of maximum permitted mass	Equal to or greater than 105% and less than 120% of the maximum permitted	Equal to or greater than 120% of the

		mass	maximum permitted mass
Length	Less than 350mm over the maximum permitted length	Equal to or greater than 350mm and less than 600mm over the maximum permitted length	Equal to or greater than 600mm over the maximum permitted length
Width	Less than 40mm over the maximum permitted width	Equal to or greater than 40mm and less than 80mm over the maximum permitted width	Equal to or greater than 80mm over the maximum permitted width
Projection	Less than 40mm over the maximum permitted projection	Equal to or greater than 40mm and less than 80mm over the maximum permitted projection	Equal to or greater than 80mm over the maximum permitted projection
Height	Less than 150mm over the maximum permitted height	Equal to or greater than 150mm and less than 300mm over the maximum permitted height	Equal to or greater than 300mm over the maximum permitted height
Loading		Not assessed on quantitative values See Part 4 of the Model Legislation	

18. The Association's representations have focussed on the particular circumstances of transporting agricultural commodities such as livestock, grains and fertiliser. We contend that the categories of breach as outlined above do not adequately account for the peculiarities of carrying these commodities. This concern is particularly relevant to the mass requirements. Many examples have been used in the past to demonstrate the impracticality of adequately complying with the requirements despite good intentions. These include heavy rain on woolly livestock during transit; the load shifting over the axles after heavy braking, incorrect assessment of the weight of livestock when they are loaded and variations in grain density.
19. For example it is difficult to accurately judge the weight of grain coming out of the paddock so that a truck is not overloaded on any axle group. Due to density and moisture variation wheat weight can vary by as much as 21% and barley by 26%.
20. We understand that breaches can be assessed per axle group. Whilst the lay person may say it is a simple enough matter to judge the overall weight of a load it is difficult to be precise about the exact weight over an axle group. One axle can be heavier and one axle lighter. The weight of the overall vehicle is correct but a penalty will be applied for the heavier axle group. It must be remembered that 5% can be as low as 825 kilograms an axle group
21. It is conceivable in all these examples that a transporter may inadvertently overload by more than 5% and therefore be placed in the substantial breach category. A transporter would then need to defend his/her actions in court without a reasonable steps defence (discussed later in the submission). This situation is not desirable for the transporter who will lose productivity, be subjected to additional costs and potentially accumulate a record of offences that may have ramifications under this legislation, insurance and finance options. Importantly this legislation casts a wide net as to who may be charged with offences including employers, business partners, officers of a body corporate and associates, including spouses and children – refer to sections 108, 109, 111 & 116. There are "flow on" implications broader than the person who physically committed the offence. The worst case scenario is that a transporter is convicted of a series of substantial breaches as a result of the inadvertent circumstances previously outlined and a court decides to impose a licensing or registration sanction or supervisory order

on that person because they are seen to be a “persistent offender”. Their livelihood is then in jeopardy.

22. It is also questionable that the public interest is served by valuable court time being expended on these matters. In country areas where JP’s may be determining the matters, the complexities of laws may also be problematic.
23. There is a suggestion that the breach regime contemplated by these laws is nothing new. This must be placed in context. Prior to WA contemplating the introduction of a compliance and enforcement approach, a tolerance of 10% was allowed and did not attract an infringement notice. Whilst this may have been an administrative tolerance, it was the common understanding of the participants in the industry and the basis on which people operated. This is not to say that transporters loaded to the tolerance. The objective was and will continue to be to load to the legal limit.
24. Commentary exists about the improvement in compliance and the reduction in overloading offences in those states that have implemented compliance and enforcement laws. Anecdotal evidence suggests that compliance is being achieved through significant under-loading. This means there are more truck movements, more on- road activity, increased fatigue, more emissions, increased wear and tear on roads and equipment and increased costs for everyone in the supply chain. The transport industry in WA has lobbied successfully in the past to use more productive vehicles with maximum pay loads. There is a risk now the investment will be under utilised in order to comply with the road rules. From a policy perspective the question needs to be asked whether this is an acceptable outcome particularly when there are several simple solutions that could be adopted.
25. An increase in the minor breach category for mass from 5% to 10% would address the Association’s concerns on this issue. We recognise that the breakpoints are not a “tolerance” and that the objective should still be to load to the legal limit , however, such a change would provide a more practical approach to infringements. It must also be remembered that in the majority of cases rural commodities have a weighbridge at their destination so there is nothing to gain by deliberately overloading.
26. The merits of this proposal have partially been adopted in the Harvest Mass Management Scheme that is currently being trialled. The trial acknowledges the vagaries of judging the weight of grain from a paddock with the precision required by the proposed laws given that there is no weighing capacity in paddocks. In our view these special provisions have not gone far enough as grains and other bulk commodities are transported throughout the year not just in a three month harvest period. De-regulation of the export wheat market and the entry of independent traders have also led to more growers opting for on-farm storage and there will be an increase in grain transport throughout the year in response to market demand.
27. The Association is concerned that a concentration on grain transport and the introduction of solutions for the short harvest period will be seen as the only agricultural issue that needs attention. This is not the case and an increase in the mass breach from less than 5% above the maximum mass permitted to less than 10% above the maximum mass permitted across the board would address this matter.
28. A solution to the point outlined at 19. above would be to implement a different approach to penalties based on whether the gross weight or the axle weight has been exceeded.

Section 30 Reasonable Steps Defence for certain S29 (1) offences

29. A driver or co-driver or a responsible person does not have a reasonable steps defence for a proven severe or substantial mass, loading or dimension offence unless a container weight declaration has been relied on.
30. This is a major concern for members of this Association in light of the significant penalties that can be awarded. These are outlined below.

Heavy Vehicle Breach of Mass Requirement					
Mass in excess of maximum permitted mass					
Above or (except in the case of %) equal to	less than	fine		minimum	
%	%				
		Penalty units	\$	Penalty units	\$
0	5	20	1000	4	200
5	10	40	2000	6	300
10	15	60	3000	10	500
15	20	80	4000	12	600
20	25	120	6000	18	900
25	30	140	7000	20	1000
30	35	160	8000	24	1200
35	40	180	9000	28	1400
40	45	200	10,000	32	1600
45	50	220	11,000	36	1800
50% or more		300.	15,000	40	2000

31. In addition to this penalty regime there are other sanctions available to the Courts such as:
- The ability to impose a “corporate” multiplier of up to five times the amount for individuals;
 - A Commercial Benefits penalty based on the gross commercial benefit a party obtained from the commission of the offence;
 - Compensation orders made to Main Roads equivalent to the damage caused to the road as a result of the offence;
 - Licensing and registration sanctions including suspension and cancellation for up to five years;
 - Supervisory Intervention Orders where the Court can order auditing, training, electronic monitoring and compliance reports (which can be made publicly available) of a “systematic and persistent” offender; and
 - Prohibition orders – a last resort option prohibiting a “systematic and persistent” offender from having a particular role associated with vehicles or their operation.
32. The earlier part of the submission highlighted the potential for transporters of rural commodities to be defending substantial breaches more frequently than general transporters. In the circumstances together with the significant penalty framework, it is inequitable for drivers, co-drivers and responsible persons (owner or person entitled to ownership or possession of the vehicle) to be denied a reasonable steps defence when severe or substantial breaches are determined. A container freight declaration is not relevant to our members given the types of commodities they transport.
33. The absence of a reasonable steps defence when all others in the supply chain appear to possess it, calls into question the concept of “chain of responsibility”. Clearly the transport operator/driver is deemed to be more culpable than anyone else in the chain and therefore less deserving of the same defence. This issue has never been adequately explained by any of the proponents of the new laws and we have serious doubts that the implications are genuinely understood.

34. Our concerns about this issue could be overcome by extending the reasonable steps to all parties when determining minor or substantial offences, regardless of whether a container weight declaration exists.

Sections 78 & 79 Improvement Notices

35. In Western Australia we have the benefit of experience with "Improvement Notices" under the Occupational, Health and Safety laws. These notices sometimes lack specificity and there is a lack of guidance from the regulators as to the precise remedial action that will satisfy the "improvement notice". This results in loss of time and increased costs whilst the business owner attempts to "second guess" what action will satisfy the requirements of the Notice.
36. The current Bill allows for discretion on the part of an issuing officer as to whether they specify the action required or not. We suggest that "Improvement Notices" issued under this legislation should specify precise details of each area of alleged non-compliance. This would contribute greatly to a company's ability to comply quickly and minimise the time and money spent unnecessarily on trying to identify the exact problem.

Division 3 Dimension Requirements – Categories of Breach; Sections 52-55

37. There does not appear to be any appropriate wording in the Bill to accommodate situations where equipment and components form part of the vehicle for the express purpose of ensuring the safety of the load or the operator, but would on a literal interpretation of the laws result in a substantial breach. For example an L shaped pin on the back of a livestock crate may extend beyond the minor breach category but is there purely for the purpose of ensuring the safety and containment of the load.
38. Similarly there may be non-hazardous projections such as livestock sticking their legs from a crate which are clearly beyond the driver's control and which would be substantial breaches.
39. Provision needs to be made in the legislation to accommodate these situations bearing in mind there is no commercial advantage to be gained in these examples and no reasonable steps defence in the substantial and severe categories.

Summary

40. In summary the Association's principal concerns relate to the break point between the minor and substantial breaches and the lack of a reasonable steps defence for drivers, co-drivers and responsible persons when defending substantial and severe breaches.
41. These concerns could be addressed by:
- a) Increasing the mass breach from less than 5% above the maximum mass permitted to less than 10% above the maximum mass permitted;
 - b) Introducing a different approach to breaches exceeding overall gross mass compared to axle weight breaches;
 - c) Requiring Improvement Notices to include details of specific action to be taken; and
 - d) Extending the reasonable steps to all parties when determining minor or substantial offence irrespective of whether a container weight declaration exists.



The Hon Simon O'Brien MLC
Chairman
Standing Committee on Uniform Legislation and Statutes Review
Parliament House
PERTH WA 6000

Attn: Ms Jan Paniperis

**Inquiry into Road Traffic (Administration) Bill 2007; Road Traffic (Vehicles) Bill 2007;
Road Traffic (authorisation to Drive) Bill 2007; Road Traffic (Consequential Provisions)
Bill 2007; Road Traffic (Vehicles) (Taxing) Bill 2007**

Thank you for the opportunity to make a submission to the inquiry on the above Bills.

Our Association is in its 28th year of operation. It represents approximately 90% of operators that transport the \$1.1billion (2003/04) livestock industry and a large percentage of operators that cart the \$3.01 billion grain industry. It is made up of and run by people that predominantly drive a truck every day. The Association is a not for profit group established to promote the development of livestock and bulk carrying and the road transport industry in serving Australia's primary industry. We make representations on a broad range of areas that are significant to our members including animal welfare, safety, efficiency, productivity and economic viability.

The attached submission focuses on the Road Traffic (Administration) Bill and the Road Traffic (Vehicles) Bill as these instruments appear to be where the model compliance and enforcement provisions are substantively pursued.

We would welcome the opportunity to make a verbal submission to the Inquiry at a later date as we consider that first hand explanation of the practical application of these provisions is important for a deeper understanding of the implications of the proposals.

Yours faithfully

G Robins
President

SUBMISSION TO THE STANDING COMMITTEE ON UNIFORM LEGISLATION AND STATUTES REVIEW

by the

LIVESTOCK TRANSPORTERS AND COUNTRY BULK CARRIERS ASSOCIATION OF WESTERN AUSTRALIA

Road Traffic (Administration) Bill 2007 and the Road Traffic (Vehicles) Bill 2007

INTRODUCTION

1. In November 2003 the National Transport Commission (NTC) released a regulatory model for State Governments to follow to introduce “chain of responsibility” legislation. “Chain of responsibility” recognises that all parties in the supply chain have obligations for adhering to transport rules. All States except Western Australia have introduced legislation based on the national model.
2. The key objectives of the legislation are to “provide a framework for clearer, nationally-consistent compliance in the road transport industry, improved road safety, the minimisation of unfair competitive advantage amongst operators, and better protection for infrastructure and the environment”
3. The Livestock Transporters and Country Bulk Carriers Association of WA (LTACBCWA) is broadly supportive of the concept that all parties in the supply chain take responsibility for adhering to transport regulations. Too often in the past the transport operator or truck driver has borne the burden of irresponsible activities by others in the process. However, this benefit should not be at the cost of fundamental principles of fairness and equity and good common sense.
4. The Minister for Planning and Infrastructure undertook to ensure our Association was consulted about the draft legislation prior to it being introduced to Parliament. Apart from an information session provided by an officer from the Department of Planning and Infrastructure there have been no discussions that are worthy of the term “consultation”. Following the briefing from the Department, the Association wrote to the Minister outlining specific concerns with certain aspects of the proposal and to date we have received no response. We therefore would like to refute the claim made during the debate in the Legislative Assembly that our organisation had been consulted; we have in fact been informed.

There are four main areas that give our members cause for concern. These are:

1. The Powers of Transport Inspectors to Enter Premises
2. Powers of Public Officers to Order a Driver to Leave a Vehicle
3. The Introduction of Improvement Notices
4. The Categories of Breach

The Powers of Transport Inspectors to Enter Premises

5. The powers of Transport Inspectors to enter premises and search without a warrant could be abused. Many of our members are small business owners operating their business from premises attached to the family home.
6. This section should be modified to incorporate reasonable protections that would not compromise the efficient operation of the law.

Powers of Public Officers to Order a Driver to Leave the Vehicle

7. Another area of concern relates to the powers of Inspectors to order a driver to leave a vehicle if it is determined they are unfit to drive e.g under the influence of drugs or alcohol. In the case of a loaded livestock truck there are very real concerns about the well being of the load; in other cases the value of the vehicle and load should be protected. We propose that the Bills be altered to include a requirement that the Inspector, Police Officer or Warden takes steps to ensure the well being of the load and the vehicle. This could include a range of actions including notifying the consignor and/or the transport operator to activate contingency plans.
8. There will not be many occasions when these situations would arise, however the consequences when they do could be drastic if steps were not taken to secure the load and vehicle.
9. Our industry often receives the response when raising issues of this nature that the officer will use their discretion. Whilst this might occur in most cases, there remains scope for an individual to act capriciously. Increasingly we are experiencing a trend by public officers towards individual interpretations of the rules that does not provide absolute certainty for our members as business operators.

The Introduction of Improvement Notices

10. The introduction of “Improvement Notices” is a new concept and apparently not one that is contemplated by the model legislation promoted by the Commonwealth. In Western Australia we have the benefit of experience with “Improvement Notices” under the Occupational, Health and Safety laws. These notices often lack specificity. There is sometimes a lack of guidance from the regulators as to the precise remedial action that will satisfy the “improvement notice”. This results in loss of time and increased costs whilst the business owner attempts to “second guess” what action will satisfy the requirements of the Notice.
11. We suggest that “Improvement Notices” issued under Compliance and Enforcement legislation should specify precise details of each area of alleged non-compliance. This would contribute greatly to a company’s ability to comply quickly and minimise the time and money spent unnecessarily on trying to identify the exact problem.
12. To this end we support the amendment moved by the Member for Leschenault in the Legislative Assembly.

The Categories of Breach

13. The determination of the categories of breach (Attachment 1) do not adequately account for the peculiarities of carrying livestock and bulk loads. We strongly contend that a minor breach of load requirements should be less than 10% of the gross mass

rather than the proposed 5%. A 10% limit for a minor breach would accommodate situations that are beyond a driver's control such as heavy rain on woolly livestock during transit; the load shifting over the axles after heavy braking and variations in grain density. Whilst there is still a penalty involved it will be less than the penalty for substantial and severe breaches.

14. There is some suggestion that the breach regime contemplated by these laws is nothing new. This must be placed in context. Prior to WA contemplating the introduction of a compliance and enforcement approach, a tolerance of 10% was allowed and did not attract an infringement notice. The rules were changed in June 2007 to foreshadow the introduction of compliance and enforcement. We are unaware of any data based on recent experience that would support the new breach arrangements.
15. During the debate in the Legislative Assembly much was made of the damage caused to the road by overloading. The Minister for Planning and Infrastructure quoted figures from Main Roads Western Australia (MRWA) that a "5% overload increases road damage by 20%; and a 10% overload increases road damage by 45%". There are several concession schemes operating now where heavy vehicles are permitted to carry more than the maximum load on certain roads. One of these schemes allows for 35% over the normal limit. Based on the figures quoted by the Minister the increase in the road damage caused by the scheme would be in the vicinity of 90+%. Some of the roads being traversed are 50 years old. For at least 30 of those years overloading was a common practice. If there is any veracity to the figures quoted it would be reasonable to expect the damage on these roads to be extreme and this is not supported by the evidence.
16. The "reasonable steps defence" proposed under these laws are said to provide the opportunity for a transporter to prove they took reasonable steps to determine the weight of the load or ensure equal distribution of a load. This is a departure from the normal onus of proof where the prosecution is required to prove that a person did not take "reasonable steps". Our members have no desire to be occupied in costly legal defence trying to prove this point. Time spent defending actions of this nature will be time spent away from their business activities. It is significant that in Queensland where this legislation has been operating for some time, there is now a move to introduce the concept of "absolute liability" which reverses the onus of proof completely and places the burden on the person being charged rather than the prosecution body.

General

17. There is also a general concern about the practical implications of the mass provisions and whether they will in fact result in a reduction of weight burden on the roads. For example Cooperative Bulk Handling has recognised the potential impact of receiving grain from a vehicle that was not loaded in accordance the legislative requirements. The obvious solution to this is to reject loads that do not comply. The truck driver may not have known that the load was not compliant until weighing on CBH weighbridge, bearing in mind there are no weighing facilities in paddocks. The result of this is that a transport operator must find a way of handling the load and at the same time complying with the legislative requirements. This is a no-win situation for the transport operator. The only option is to travel to a destination where the load can be reduced, thereby breaching the rules and probably negating any reasonable defence. If safety and protecting the road asset is an objective of the laws this situation is clearly at odds with such a notion.

18. The Minister for Planning and Infrastructure claimed that the results from the trial Harvest Mass Management Scheme administered by CBH over the last two harvests indicated that it was possible to improve performance. She based her comments on figures that suggested that prior to the trial 20% of vehicles were overloaded and at the end of the trial only 7.6% of vehicles were overloaded. The experience in NSW where the legislation has been operating for several years is that vehicles carrying grain to Grain Corp on average are under loaded by 6-7%. This has come about because the transport chain is erring on the side of caution and not loading to the full potential. The end result of this is higher transport costs and more vehicle movements; it is in no way a demonstration of improved performance
19. It is implied in some of the debate that human behaviour will ensure that operators will load to the upper limit of a minor breach. This proposition is not supported by any data that we have seen. Claims have been made that in the October – December 2007 quarter 40% of the 70% of accredited vehicles tested were not compliant. This is used to somehow justify the break point for loading tolerance. It must be emphasised that these figures do not differentiate between the types of breach and include many that would be characterised as trivial. There is no commercial benefit for a transport operator to purposely breach loading requirements.

Conclusion

20. It is convenient to dismiss the concerns raised above as a general resistance to change. Our Association has historically embraced changes that have a demonstrated long term benefit for the professionalism of the industry as indeed our charter requires. We have worked closely with Governments to ensure the smooth introduction of heavy vehicle accreditation, fatigue laws and many other initiatives. We actively participate in many working groups and collaborate with the bureaucracy in an effort to ensure good outcomes for industry and the WA community as a whole.
21. We welcome a more equitable distribution of responsibilities in the transport supply chain, and contend that this should occur without inadvertently introducing inefficiencies and inequity.
22. These laws have been operating in other States for several years and it would seem appropriate to make some inquiry about the experience there in an effort to ensure we do not repeat mistakes that could be avoided.

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