1. Title

Compliance and Enforcement in Australia’s Brave New Heavy Vehicle World.

1.1 Author Information

Dr Sarah Jones is a Project Director at the National Transport Commission in Australia. She is responsible for the development of heavy vehicle laws and strategic policy, including around co-operative intelligent transport and compliance and enforcement. Her particular interest is in the psychology of compliance and the relationship between law and its objects. She holds a PhD in history and politics from the University of Western Australia and has worked in transport policy for the last decade. She is also a published novelist and a columnist with Australian literary and cultural journal *Kill Your Darlings*.

1.2 Abstract

Recent reforms mean that Australia is about to replace 23 separate regulatory bodies with just three in the heavy vehicle, maritime and rail modes. This shift from a fragmented, state-based system to a seamless national system presents particular challenges for compliance with, and enforcement of, heavy vehicle law. This paper explores how compliance and enforcement (C&E) can potentially be managed in a context of escalating freight task demand and downward trending C&E resources.

1.3 Key Words

Heavy vehicle, compliance and enforcement, Australia, national reform, risk management, compliance culture.

2. Introduction

Australia is about to enter a ‘brave new world’ that, for the first time, means Australia’s freight transport industry will be nationally regulated. New national laws either have replaced, or are about to replace, 23 separate state and federal regulators with responsibility for heavy vehicle, rail and maritime safety and productivity (Albanese, 2012). Under the new law, freight will move freely between Australia’s eight states and territories, unfettered by confusing and misaligned state laws subject to conflicting enforcement regimes. This transport reform, which has been described as ‘a revolution 150 years in the making’, is expected to boost national income by $30 billion over the next 20 years.

In this paper, I will focus on the compliance and enforcement implications of the reform agenda for heavy vehicles. Australia’s vast distances and dispersed population make it particularly reliant on heavy vehicle freight to supply goods and services. While other modes such as rail and shipping are effective at transporting goods between major distribution centres, only road freight is sufficiently nimble for ‘last mile’ access. Road freight accounts for a far greater share of gross domestic product than shipping, rail or air as charted below (BITRE, 2009):
My team and I have spent the last eighteen months analysing the current C&E environment and developing a strategy for our approach to C&E in the future. The findings I will share with you in this paper are drawn from interviews, surveys and on-road observations with enforcement officers, policy experts, drivers and operators.

3. **Compliance and Enforcement in the Heavy Vehicle Context**

There is no doubt that the heavy vehicle road safety story in Australia is largely a success story. Stakeholders interviewed for this project testify to a changing consciousness about safety from the early 1970s where it was a peripheral concern to today where it is core business for many operators. Laws and policies introduced since the 70s have significantly modified on-road behaviours and community norms.

The success of compliance and enforcement interventions is reflected in the statistics which indicate a 73% fall in the number of fatalities involving heavy vehicles since 1990 (BITRE, 2012).
Chart 2: Fatalities involving heavy vehicles in Australia 1990-2010

Despite these advances the Australian heavy vehicle industry remains risky for the people who work in it and for other road users. Whilst heavy trucks and buses make up only 3% of registered vehicles and about 8% of the vehicle-kilometres travelled (VKT) on Australia’s roads, they are involved in (albeit not necessarily responsible for) 18% of total deaths and 3% of total injuries (ATC, 2011). In New South Wales, which has the highest volume of interstate freight, heavy vehicles were involved in 21% of all fatalities on the state’s roads between 2003 and 2007 (NSW Centre for Road Safety, 2009). An Auditor General’s study found that an individual was three times more likely to die in a crash where a heavy vehicle was involved (NSW Auditor General, 2009). The grief and trauma occasioned by these crashes are incalculable. The purely economic cost is estimated at around $3.8 billion per year (CIE, 2011).

Unsafe heavy vehicle practices have other ripples throughout the economy and community. Practices like overloading, speeding and driving contrary to fatigue laws threaten the livelihood of law-abiding operators potentially resulting in a ‘race to the bottom’ as competitors undercut one another.

Not only do these practices create unsafe and unfair environments, they accelerate road infrastructure degradation, the costs of which must then be borne by other road users. Nine years ago, before the present tranche of reforms was commenced, it was estimated that an average of 13.8% of articulated vehicles and 2% of rigid trucks were overloaded (Jaguar, 2003). The 2003 cost of road infrastructure damage caused by these non-compliant vehicles was estimated to be in the range of $50 - $100 million (Jaguar, 2003).

Incidents involving heavy vehicles tend to attract significant media attention and so can be politically sensitive. Accidents involving heavy vehicles, regardless of whether the truck was at fault or not, generate press attention and public comment. Our politicians tend, therefore, to be mindful of the need to manage safety, and perceptions of safety, in the industry.

4. The C&E Challenge

The dilemma for compliance and enforcement in Australia is stark: resources devoted to on-road enforcement in almost all states are trending downwards, yet the freight task is set to treble over the next fifty years. It is unrealistic to expect that enforcement resources will treble to keep pace with this expansion. Indeed, one jurisdiction reports that they are already operating at just 20% of the estimated resourcing level needed to adequately police the current freight task.

The risk of a reduction in visible, on-road policing is that the probability of perceived detection will decline leading to operators ‘pushing their luck’ and overloading or speeding vehicles to secure a competitive advantage. The relationship between certainty of detection and compliance is amply illustrated by the experience of the state of Tasmania. Around five years ago transport inspectors ceased on-road weighing of vehicles. The result was a noticeable increase in over mass breaches. On-road intercepts for mass checking were re-introduced and the non-compliances nearly halved as charted below:
Managing compliance and enforcement in an environment of downward trending resources has two over-riding implications. The first is that C&E must be risk-managed. Scarce resources must be targeted where they will generate the best effect. Secondly, regulators must be creative in their attempts to normalise compliance so that there is a cultural expectation in the industry that the right thing will be done. In this way, there is a lesser need for enforcement and punishment. In the remainder of this paper I will focus on some of the ways we propose to manage these challenges.

5. **Risk Management**

Enforcement authorities will need to be strategic about where and how they target resources to generate the maximum compliance outcomes from the available capacity. Resources will need to be targeted towards high outcome interventions; i.e. interventions that identify, stop, punish and deter the most unsafe and inequitable practices.

The ability to take a risk managed approach is premised on comparisons between operators to ascertain which represents the higher risk. Timely, accurate and sufficient data is required to meaningfully differentiate between operators. A comparative assessment relies on accurate intelligence about vehicles, drivers, operators, other parties in the supply chain and road conditions.

One of the systems that we are exploring is ‘Truckscan’, which was developed in-house by the New South Wales Roads and Maritime Services department.

5.1 **The Truckscan System**

Truckscan is a screening system that enables rapid evaluation of vehicle risk against pre-set criteria so inspectors can decide whether to take enforcement action against a particular vehicle. Low risk rated vehicles continue on their way whilst high risk vehicles are directed to enter a station for further investigation or are apprehended on road. The advantage of the system from an enforcement perspective is that it enables meaningful evaluation of the relative risk posed by a vehicle so resources can be better targeted. The advantage from an operator perspective is that there is minimal inconvenience to heavy vehicles rated as low risk.
Truckscan pools data from a variety of sources and organises it against 36 criteria considered key in establishing a vehicle’s relative risk. For example, information about the vehicle’s mass (total and axle), height and length and classification is collected by a weigh in motion (WiM) and associated devices as the vehicle drives in a screening lane. A gantry-mounted camera known as Safe-T-Cam captures and identifies the vehicle’s number plate which is then used to locate the vehicle’s status on a national database known as NEVDIS. Point to Point and Safe-T-Cam plate recognition data ascertains the vehicle’s average speed between two points and also identifies potential fatigue breaches. Once the registration number is known the regulatory authority’s database produces historical information including previous notices (infringements, defect notices etc). An algorithm sits behind the historical and the current data to weight it for the seriousness of the risk. Users can specify ratings that prioritise particular history and operator characteristics.

If the vehicle is determined to be high risk, an automatic message on the gantry alerts the vehicle to enter a checking station where it will be inspected by officers. (Most of the officers have mechanical or technical backgrounds). If the vehicle is in breach Truckscan is used to generate notices and other official documents and register the non-compliance in its database. These documents include breach reports, penalty notices, official warnings, defect notices, direction to secure, adjust or reduce load, license suspension advice, direction for a driver to perform some action or journey and unregistered vehicle advice.

A sample Truckscan ‘screen’ is illustrated below.

<table>
<thead>
<tr>
<th>Category</th>
<th>Criteria</th>
<th>Description</th>
<th>Value</th>
<th>% Check</th>
<th>Screening Score</th>
<th>Enabled</th>
</tr>
</thead>
<tbody>
<tr>
<td>WWM</td>
<td>Gross Major</td>
<td>Major gross overload (%)</td>
<td>10</td>
<td>100</td>
<td>95</td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Axle Major</td>
<td>Major axle overload (%)</td>
<td>10</td>
<td>100</td>
<td>95</td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Gross Minor</td>
<td>Minor gross overload (%)</td>
<td>5</td>
<td>100</td>
<td>75</td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Axle Minor</td>
<td>Minor axle overload (%)</td>
<td>5</td>
<td>100</td>
<td>75</td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Height</td>
<td>Over height</td>
<td>100</td>
<td>95</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Overhang</td>
<td>Excessive overhang</td>
<td>100</td>
<td>75</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Length</td>
<td>Over length</td>
<td>100</td>
<td>75</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Axle Spacing</td>
<td>Incorrect axle spacing or inconsistent WiM data</td>
<td>19</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>Balance</td>
<td>Unbalanced axle</td>
<td>25</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>WWM</td>
<td>WMM Speed</td>
<td>Excessive WMM speed (kph)</td>
<td>70</td>
<td>100</td>
<td>45</td>
<td></td>
</tr>
<tr>
<td>ITRCAM</td>
<td>WMM No Data</td>
<td>No WMM data</td>
<td>13</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAFETCAM</td>
<td>STC Tailgating</td>
<td>Tailgating in the screening lane</td>
<td>19</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITRCAM</td>
<td>Registration</td>
<td>Invalid registration</td>
<td>100</td>
<td>95</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITRCAM</td>
<td>Defect Major</td>
<td>Major defect outstanding</td>
<td>100</td>
<td>95</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITRCAM</td>
<td>Defect Minor</td>
<td>Minor defect outstanding</td>
<td>100</td>
<td>75</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITRCAM</td>
<td>DRRVES No Data</td>
<td>No DRRVES data</td>
<td>19</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truckscan</td>
<td>Vehicle Alert</td>
<td>TruckScan vehicle alert</td>
<td>100</td>
<td>95</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truckscan</td>
<td>Operator Alert</td>
<td>TruckScan operator alert</td>
<td>100</td>
<td>95</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truckscan</td>
<td>HVRIS</td>
<td>Heavy Vehicle Rating System</td>
<td>70</td>
<td>100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truckscan</td>
<td>TBS No Data</td>
<td>No TruckScan data</td>
<td>25</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truckscan</td>
<td>No Sighting</td>
<td>No OCR data</td>
<td>25</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truckscan</td>
<td>OCR Plate not read</td>
<td></td>
<td>1</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAFETCAM</td>
<td>Travel Time</td>
<td>Suspended fatigue</td>
<td>100</td>
<td>75</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAFETCAM</td>
<td>STC Alert</td>
<td>EAFE-T-CAM alert</td>
<td>100</td>
<td>95</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAFETCAM</td>
<td>STC No Data</td>
<td>No SAFE-T-CAM data</td>
<td>100</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SAFETCAM</td>
<td>STC No Data</td>
<td>No SAFE-T-CAM data</td>
<td>100</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Truckscan</td>
<td>Avoidance Alert</td>
<td>Avoidance Alert</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Figure 1: Truckscan Screen**
Truckscan takes about 6 seconds to compute the entire checking process and is operational at several sites across New South Wales.

5.2 Electronic Work Diaries (EWDs)

Given Australia’s vast distances and long stretches of straight roads, it is not surprising that fatigue is a key issue for Australian regulators. The National Road Safety Strategy estimates that fatigue is implicated in between 20% to 30% of deaths on the road and around 8% of total serious injuries (Standing Committee on Transport, 2010). This accounts for between 28 and 47 deaths per annum where fatigue is a factor and articulated trucks are involved. By international standards, Australia’s approach to fatigue management is generous. Under a system known as Advanced Fatigue Management (or AFM), drivers can work a maximum of 154 hours in 14 days provided certain conditions around work and rest are adhered to.

Fatigue regulations are amongst the most contentious of the heavy vehicle laws. Operators and drivers tell us that they can be difficult to interpret which leaves them vulnerable to inadvertent breaches. Fatigue infringements can cost drivers in the order of $600 per infringement, sufficient to eat up a week’s wage.

At present, although the national law recognises EWDs, there is no policy or technology basis to support their use. Australia does not yet have a national ITS architecture or a policy framework for systems that track drivers rather than vehicles. We rely at present on written work diaries that look like this:

Figure 2: Written Work Diary

As you can see, the work diary is administratively burdensome, requiring the driver to account for every fifteen minutes of their time. It is also time consuming for onroad enforcement officers who have to flick back through the pages making complex calculations about work and rest hours.
An electronic work diary that makes these computations automatically can radically reduce the time devoted by both industry and regulators to managing fatigue. Through eliminating the ‘guess work’ it can reduce driver and operator stress. It also has the potential to better manage schedules through add-on applications such as advice to drivers on how many suitable rest breaks they will pass before they are grounded by a regulated rest break.

A pilot project is currently in train across Australia to test EWDs and develop a policy framework for their use. Involving nearly fifty operators and running over 3 years to 2013, the objective is to examine the feasibility and effectiveness of EWDs and to resolve some of the policy issues around their use. The pilot is still ongoing so conclusions haven’t been formed but I can tell you that unlike the European digital tachograph we have moved away from the necessity for printers in the vehicle and are instead exploring remote compliance assessment software.

6. Normalising compliance

‘When mores are sufficient, laws are unnecessary, when mores are insufficient, laws are unenforceable’ – Emile Durkheim

As a regulatory authority our ultimate goal should be to normalise compliance with laws to such an extent that diversion from them is considered unacceptable by the industry that is governed by those laws. We have been conducting research into how we can foster a culture of compliance and have some preliminary findings that I will now share with you.

6.1 Sufficiency and quality of laws

Our research tends to confirm the Organisation for Economic Co-operation and Development’s (OECD) findings that it is not enough to simply promulgate law, sit back and expect compliance (OECD, 2000). The laws must be internally coherent and comprehensible to the people whom are the object of the law. Simply put, the law must promote compliance through being logical and sensible to the people that operate within its constraints. Regulatees must also be aware that the law applies to them. Furthermore, those laws must be well understood and even-handedly applied by those charged with its enforcement.

The evidence suggests that the heavy vehicle laws may have inadvertently discouraged and hindered compliance because of the way they were framed and administered. Experience with our fatigue laws is illustrative. Concepts and definitions that were essential to the ability to comply such as what constitutes a 24 hour period, the distinction between ‘work’ and ‘rest’ and how time is to be counted were widely experienced as vague or confusing. Furthermore, inadequate or insufficient supporting infrastructure may hinder an operator’s ability to comply. For example, proscribed rest breaks require places where heavy vehicles may safely pull off the road and the driver is able to maximise the benefits of rest. However, there is an acknowledged shortage of rest areas on Australian roads (Austroads 2008).

Many owner/drivers and owners consulted for this project expressed the view that the fatigue laws have inadvertently created some of the very behaviours they were designed to prevent. The law stipulates a maximum amount of time that may be worked and prescribes rest breaks at particular intervals. These rest breaks may not accord with the rhythms of the individual driver’s body. As one driver put it:

‘A logbook cannot see when you are tired, but it can tell you to stop when you are not, when there is no food, no shade, no toilets and then affect whether you get unloaded without any consideration of the drivers current state of alertness’ (Truckright, 2011)
Perhaps even more worryingly, if a driver is held up on the road for any reason such as an intercept then their ability to make their destination within set work and rest times may be compromised. Some drivers reported that this effectively forces them to speed. These drivers rejected the idea that they were speeding for economic reasons, pointing out that as they were paid per kilometre this made little difference. Rather, they were speeding to squeeze their work into the time that remained before they were grounded by a required break or a reset.

Similar criticisms were made by industry about the introduction of the chain of responsibility (CoR) laws. Apparently, some receiving and distribution centres sought advice as to how their CoR obligations were best managed when trucks were overloaded. Should the vehicle be returned to the road (with the attendant road safety and degradation issues) or unloaded and another means found to prevent the practice recurring? Advice from Regulatory bodies on this point was seen as sometimes vague and ‘handballing’, amounting to little more than ‘you’ll need to get legal advice’. The point here is not to criticise past practice but to emphasise how a lack of policy forethought and practical guidance can hamper the efforts of the well intentioned in the industry. When those who are inclined to comply are thwarted by contradictory or confusing advice the resulting frustration can lead to the abandonment of self-regulation and even a conscious thwarting of law as a means of passive resistance.

We are now actively working to provide unambiguous guidance in the law and policy guidelines about how the fatigue law should be interpreted. We are also introducing new technologies to take the guesswork out of the law. I mentioned the EWDs earlier and their potential to empower drivers to make informed decisions about work and rest breaks and appropriate facilities on their route. Another technology we are developing is our Online Vehicle Assessment Tool or OVAT. This is an extract from our Heavy Vehicle (Mass, Dimension and Loading) National Regulations, Schedule 1 about wheelbase and axle spacings:

![Figure 3: Axel Spacing Mass Limits Law](image-url)
It is not the most user friendly technical advice so our team have developed the OVAT which allows the operator to complete their vehicle combination details online and gives them real time advice about vehicle compliance.

![Figure 3: OVAT screen](image)

### 6.2 Tailored Intervention Strategies

Like many regulatory authorities we recognise that the reasons why non-compliance occurs differ and that successful intervention strategies need to reflect why the non-compliance occurred. For example, if an individual is non-compliant because they have misinterpreted the intent of the law or because they work under a business model that factors in the cost of non-compliance, then repeatedly hitting them with a fine is not going to do anything to change the fundamental reasons behind the non-compliance.

Our new national law, based on the *Compliance and Enforcement Bill* of 2003, enables a nuanced and contingent approach. Our enforcement offices are now provided with a suite of intervention options that range from advisory and persuasive to out rightly punitive depending on the severity of the non-compliance.

Furthermore, the new law introduces the ‘chain of responsibility’ concept across the country. This broadens the enforcement focus beyond the driver to encompass all parties in the supply chain. The ‘reasonable steps’ defence allows parties that do the right thing to distance themselves from those that do not. Legislative recognition of codes of practice enshrines a new emphasis on company systems, processes and cultures designed to promote compliance.
The approach taken in the legislation gives effect to the balancing act of ‘carrot and stick’ responsive regulation as pictured below (McIntyre and Moore, 2002):

![Responsive regulation in the C&E legislation](image)

At the base of the pyramid educative strategies are available in the form of improvement notices and formal warnings which are undertakings to do certain things to improve safety and compliance. They have no financial or otherwise punitive impact if attended to. More serious offences will be met with infringement notices which are set at about 15% of the court-imposable maximum penalty. If paid the individual does not need to attend court. The most serious offences necessitate court attendance and may result in commercial benefits penalties whereby the offender has to pay up to three times the amount they would have derived had the non-compliance gone undetected. This was specifically designed to prevent fines being approached as simply a ‘cost of doing business’. The court can also issue compensation orders requiring the cost of road and infrastructure damage to be remitted to the road owner. Towards the top of the pyramid courts may mandate practices such as certain technologies that the operator must adopt for up to one year to prove they are operating compliant with the law. These are known as supervisory intervention orders. For the hard-core recidivists and those presenting a danger to public safety the court can suspend or cancel vehicle and driver licences and prohibit the company from continuing to operate.

6.3 Incentives, Rewards and Concessions

I mentioned earlier that the ability to conduct genuinely risk-managed interventions is premised on high quality, timely data that enables a regulator to differentiate between a high and a poor performing operator. We are still some way away from a national intelligence and analysis system that enables us to do so.

However, when the system is operational, it has the potential to deliver something that hasn’t been much explored in our heavy vehicle policy space: to provide empirical evidence of the best performing operators who can then benefit from rewards and concessions that recognise their good performance. The advantage to this sort of approach is that it counterbalances the economic advantages that accrue to the non-compliant and provides a sound incentive for compliance.
There is precedent for an incentive and reward system in the Australian transport system generally. For example, some cities have differentiated traffic lanes for public transport or high occupant vehicles. Our Federal Interstate Registration Scheme (or FIRS) offers stamp duty reductions to the operators in the scheme. Senior citizens receive discounts on their licensing and registration costs and drivers in one state who complete their probationary period without incurring demerit points receive a sizeable discount on the cost of their licence. The entire vehicle insurance model is premised on the notion of safer drivers and vehicles being subject to lowered premiums.

So what levers can we reasonably pull to offer rewards and incentives to heavy vehicle drivers and operators? One place to start is with the government’s own transport spend. Collectively, Australian governments spend around $1.7 billion on transport each year, the bulk of which would be on light vehicles. However, if just 5% of this spend is directed towards heavy vehicles that accounts for more than $85 million. One policy option might be that a pre-condition for eligibility for these contracts is a high rating as determined by the national data and intelligence system. Reduced registration and licensing costs for high performers is another potential policy lever at the governments disposal. Another option we’re exploring is reduced insurance premiums for high quality operators. Then of course there are all the marketing benefits that would accrue to the best performers who could hawk their ratings to contractors and customers directly as a market differentiator.

7. Conclusion

Australia’s new national approach to heavy vehicle compliance and enforcement presents challenges and opportunities. A key challenge is how to manage C&E in a context of expanding freight task and shrinking resources. A risk managed approach is essential to ensure that scarce resources are directed at the areas of highest risk. This approach is premised on sufficiency of accurate data enabling meaningful comparisons between operators. Regulators must also do more to promote the development of internally consistent, readily understandable law supported by tools that take the guess work out of compliance.

8. References


Austroads, Audit of Rest Areas Against National Guidelines, 2008

BITRE, Fatal Road Crashes in Australia in the 1990s and 2000s: Crash Types and Major Factors, Information Sheet 41

BITRE, Fatal Heavy Vehicle Crashes Australia Quarterly Bulletin, Jan - March 2012


Centre for International Economics (CIE), Benefit-cost analysis for Regulation Impact Statement of Heavy Vehicle National Law, 2011

Department of Infrastructure and Transport, Road Freight Estimates and Forecasts in Australia: Interstate, Capital Cities and Rest of State, Research Report 121, 2010

Jaguar Consulting Pty Ltd, Road Transport Reform (Compliance and Enforcement) Bill Regulatory Impact Statement, November 2003


NSW Centre for Road Safety, Roads and Traffic Authority (RTA) Submission to the Joint Standing Committee on Road Safety, Submission 22-Attachment A Heavy Vehicle Driver Fatigue and Speeding Compliance Legislation, 7th April 2009


Truckright submission to the *National Heavy Vehicle Law Regulation Impact Statement*, National Transport Commission, 2011