



Mr Richard Hancock
CEO
National Heavy Vehicle Regulator
PO Box 673
Fortitude Valley QLD 4006
(by email: info@nhvr.gov.au)

Dear Mr Hancock

Fees for regulatory services – submission in response to consultation document

The Australian Livestock and Rural Transporters Association (ALRTA) is pleased to offer this brief submission upon the recent consultation document *'Fees for regulatory services: Setting fees for the National Heavy Vehicle Regulator in an initial operational phase'*.

The ALRTA notes that these fees principally relate to the various accreditation and permit-issuance schemes that will be managed by the NHVR from 2013 onwards. As there has been a delay in the NHVR taking up its endorsed role in managing heavy vehicle registration, the proposed fees do not encompass vehicle registration or inspection services.

The ALRTA considers that the quantum of the fees that are currently proposed to be charged by the NHVR for these various accreditation and permit-issuance transactions are not onerous. If implemented, they would not raise any material issues for our members.

Given that the quantum of these fees is quite modest, the ALRTA suggests that the question of greater interest is what level of business performance they will equip the NHVR to deliver.

The ALRTA expects the NHVR to be an effective steward of the national accreditation schemes and the network access and assessment business, once the agency takes on these business activities.

Clearly, our expectation is that the NHVR's transactional services and decision-making will be accurate, timely, fair and correct.

At a strategic level, however, we also expect the NHVR to ensure that its accreditation and access-approval businesses are constantly fit-for-purpose, are achieving their policy objectives, and have the confidence of industry, and also of the community and government (including the various State Police Forces, and also Councils and Shires).

The ALRTA has previously questioned whether these goals are being reliably fulfilled under the soon to be abolished State-based arrangements, particularly in relation to the current accreditation schemes.

It is important that these questions and concerns do not simply transfer across to the NHVR.

On currently available information, the ALRTA cannot assess whether the NHVR will have the resources and strategic management capabilities to achieve these goals. In addition, as there are a number of avenues currently open to the NHVR to secure its resourcing, the ALRTA cannot make a judgement as to whether transactional fee revenue has a bearing on the agency's ability to secure those resources and capabilities.

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As the establishment and funding of the NHVR is progressed, the ALRTA would welcome engagement with the agency to assess whether its business capabilities will meet our needs and expectations. We look forward to working constructively with the NHVR to ensure that it has sustainable capability to deliver efficiently the services and stewardship that we expect from it.

Yours sincerely

A handwritten signature in dark ink, appearing to read "John. Beer". The signature is fluid and cursive, with a large initial 'J' and a trailing flourish.

President
AUSTRALIAN LIVESTOCK AND RURAL TRANSPORTERS ASSOCIATION

4 January 2013

About ALRTA

- 1) The Australian Livestock and Rural Transporters Association (ALRTA) is the peak federation representing transport companies who provide the 'first and last' link of the supply chain for Australia's agricultural industries and communities across regional, rural and remote Australia.
- 2) Australian agriculture relies on ALRTA's members in order to access domestic and global markets. Almost all inputs to, and production from, Australian agriculture involves transport by truck.
- 3) The ALRTA is a member of the Australian Logistics Council (ALC), the Australian Trucking Association (ATA), and the Council of Small Businesses of Australia (COSBOA).