

**Submission to:** The National Transport Commission

**Title:** Mass Limits for 2 axle Buses: Discussion Paper

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## 1. Introduction

The NTC have identified that some two axles buses are operating above legal mass limits on an infrequent basis as a result of a number of factors including regulatory requirements and industry standards.

The ATA supports the facilitation of land freight movements, which in this case involves passengers. The issue seems to occur infrequently and in some states buses are already afforded mass concessions by way of a 10 tonne limit for single axle with dual tyres.

However, if mass limits for two axle buses are increased there are consequences for the rest of the heavy vehicle industry that the NTC needs to be aware of and prepare for.

If the NTC does approve any of the options presented to increase the mass limits for 2 axle buses, the trucking industry has every right to question why mass limits for trucks should not undergo the same review as buses have been afforded, given the superiority loading practices of trucks compared to bus loading and the more accurate capture of truck charges.

## 2. Australian Trucking Association

The ATA is the peak body that represents the trucking industry. Its members include state and sector-based trucking associations, some of the nation's largest transport companies, and businesses with leading expertise in truck technology.

## 3. Recommendation

### Recommendation

The NTC should extend the discussion around increasing two axle bus mass limits to a wider conversation on increasing steer axle mass on wide tyres and for ultra-wide single tyres as a replacement for dual tyres .

## 4. Options

While the NTC options provide some way forward on the issue of bus axle overloading, there are other possibilities that should be proposed for NTC consideration including:

- Revising passenger weights,
- limiting passenger numbers (seated and standing) based on GVM and tare weights,
- monitoring buses via IAP. We note this onerous obligation is imposed in some states for heavy vehicles with zero pavement impacts and yet here we have suggested impacts well above that allowed for trucks,
- providing buses with an additional axle (which could be self-steer).

## 5. Legal requirements

If the NTC does endorse increasing mass limits for two axle buses, industry will expect to see how current notices ensure that buses being afforded these increased axle limit benefits are suitable and possess axle and other equipment of adequate specifications (axle limits and braking compliance at higher gross vehicle mass).

The apparent relaxed attitude to the issue of overloading on heavy vehicles such as buses is worrying. Legal loading requirements are implemented for safety reasons and the NTC's perspective and the agency responses towards bus overloading as an issues could be seen as not as responsible as stakeholders may desire. Heavy vehicles overloaded by a magnitude of 2 tonnes, for example, would have significant penalties placed upon their drivers and their operators.

There are legal requirements that a truck driver/operator is expected to adhere to if mass overloading is occurring, however, the NTC seem to concede that bus drivers may not know if they are overloaded. This is a conflict of technical expectations, given that all heavy vehicles including buses fall under the same heavy vehicle national law indicating mass infringements and penalties. It is no different to the livestock transporter moving cattle with a truck; the responsibilities should be the same.

If the states and the NTC have differing views towards bus overloading to protect state bus companies from penalties, this is not acceptable, since privately owned enterprises and public entities should attract equivalent treatment before the law.

## **6. Equivalent Standard Axle (ESA) impact and heavy vehicle charges consequences**

With the increase in ESA associated with more mass spread over the same axles, there needs to be consideration of what this means in the current PayGo heavy vehicle charging model.

Pavement wear is not alleviated through reductions in emissions and congestion on roads, as the NTC states. The pavement wear issue remains the same.

The ESA impact of buses will need to be readjusted given the mass concessions based on recorded AGM. This will affect the allocation of cost to be recovered from the heavy vehicle industry; in other words, if the ESA for buses increases they will need to pay higher registration fees to compensate for the increase in road wear.

The NTC have recently revised ESAs for all heavy vehicles and any change to the ESA needs to be factored into the charging model to make sure that all heavy vehicles pay their allocated costs.

The ATA believes the proposed bus mass increases set precedents that require the NTC to be far more proactive in considering the trucking industry's long standing requests for increases to steer axle mass on wide tyres and for ultra-wide single tyres as replacement for dual tyres. There is sound science and engineering behind ATA's requests and the bus proposals are superficial in comparison.

### **Recommendation**

The NTC should extend the discussion around increasing two axle bus mass limits to a wider conversation on increasing steer axle mass on wide tyres and for ultra-wide single tyres as a replacement for dual tyres .