



Submission to the

Rural and Regional Affairs and Transport
References Committee Inquiry

on the

Importance of a viable, safe, sustainable and efficient road
transport industry

November 2019



1.0 About the Queensland Trucking Association

The Queensland Trucking Association (QTA) welcomes the opportunity to provide comment on behalf of the Queensland Road Freight Industry to the Rural and Regional Affairs and Transport References Committee Inquiry on the importance of a viable, safe, sustainable and efficient road transport industry.

By way of background the Queensland Trucking Association Limited (QTA Ltd) is the peak industry association for road freight operators in Queensland including owner drivers through to major logistics companies.

QTA is a founding member of the Australian Trucking Association (ATA) and we are recognised by the Queensland Government as the pre-eminent Road Freight State Industry Association.

QTA demonstrates substantial leadership on industry issues and engages constructively with industry stakeholders and government to influence positive change in policy, regulation and law reform to support the operation of a profitable, efficient and safe industry.

2.0 The Importance of Queensland's Road Freight Industry

Road freight is an enabler of opportunity, allowing businesses to reach domestic and international markets, consumers to purchase goods, farms to sell their produce, and movement of construction materials to enable new developments. This is particularly critical to supporting jobs and economic growth in rural and regional communities.

Key statistics about Queensland's road freight industry include:

- Each day 283kg of freight is moved by our road freight industry for each Queenslander;
- There are currently 10,167 transport operators operating in Queensland;
- Queensland's road freight industry employs approximately 62,050 Queenslanders providing a livelihood of nearly \$3.1 billion in wages; and
- Total kilometres travelled by Queensland's road freight industry in 2017-18 was 17,592 million kilometres; and

Total tonnes moved by Queensland's road freight industry in 2017-18 was 518 million tonnes. In short road freight is critical to the national and Queensland economy providing the backbone of supply chains. The domestic freight task is forecast to grow 26 per cent by 2026 significantly above both population and economic growth.

Queensland trucking operators are global leaders that have pioneered modern, safer, and more productive vehicle designs. Queensland has always been a leader in the use and development of road trains and high productivity vehicle combinations that deliver improved safety and productivity for our supply chains in the most decentralised state.

The QTA wishes to provide specific comment to each of the terms of reference:

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

Terms of reference f) efficient cost-recovery measures for industry stakeholders, including subcontractors

3.1 An Industry under severe pressure

The Australian trucking industry consists substantially of small businesses, is characterised by tight margins and it is experiencing severe challenges at present relating to viability.

Over the past 5 years the total national freight vehicle tonne-kilometres has increased from 198,664 million tonne-kilometres in 2012-13 to 214,789 million tonne-kilometres in 2017-18 or by 8.1 per cent however total national road freight industry revenue has only increased by 7.1 per cent over this period.



At the same time total national road freight industry expenses have increased by 8.4 per cent over this period and expenses relating specifically to the purchasing of goods and materials have increased by 36.4 per cent. When adjusting for changes in total tonne-kilometres total road freight industry revenue has actually fallen by 0.9 per cent and total road freight industry operating profits before taxes have fallen by 8.5 per cent.

In summary, over the last 5 years for every \$1 increase in revenue there has been on average for each operator of a \$1.81 increase in expenses. As a result, 13,754 Australian transport operators have ceased to exist over the past two years as business viability has been eroded. Furthermore 14 per cent of the industry are now anticipated to be operating at a loss.

Quite simply the road freight industry is being asked to do more for less, whilst costs increase and business profitability is reducing viability.

3.2 Road Transport Costs and Pricing

There is a lack of profitability across the industry with many businesses failing across the country each year. Action needs to be taken by the government and key stakeholders to ensure that transport costs are respected and equitable for everyone to sustain this vital sector that underpins the Australian economy.

The road freight industry has relied upon improved efficiencies through bigger trucks and productivity gains to remain viable, however there has been little done in the setting of minimum freight costs over time.

Investment in trucks and trailers is substantial. The average price of an efficient prime mover and B-Double combination is in excess of \$650,000. Given the huge investment involved, there needs to be greater scrutiny in how pricing and contracts are determined to safeguard small and medium businesses from monopolistic conduct and subsequent financial failure.

3.3 Issues

The following issues have been identified as some of the difficulties transport operators are currently experiencing.

3.3.1 Competition

Competition is fierce in the freight industry with many unscrupulous operators trading. Many of these operators price undercut (well below cost reflective levels) in order to win business. Long term these operators are set up to fail, however the short-term effects of such trading strategies affect other operators in competing for work responsibly.

Many operators achieve price domination by not paying statutory obligations on time, not maintaining vehicles to a safe standard and also running drivers outside of legal hours. Statutory obligations can include superannuation, taxes and non-payment of unsecured creditors. Overall this has a negative effect on the industry as prices are driven down and margins stagnate.

Industry licensing is canvassed by some but is an unlikely solution and will bring to bear yet another level of bureaucratic costs with a tenuous benefit.

3.3.2 Imbalances in Market Power to Effectively Negotiate Viable Rates

There are reports across the industry that road freight operators are unable to negotiate viable rates which provide a rate of return in order to allow their business a reasonable chance of being sustainable in the medium to long term. This market failure is evident in the power held by consignors/consignees; the inability to negotiate reasonable contract conditions to address unpredictable movements in costs such as fuel; a preparedness on the part of freight operators to win business on price; and a preparedness on the part of the consignors/consignees to accept that price alone is the sole basis on which a contract is agreed.

Governments at all levels should also consider the impact of awarding lowest price with contracts they enter that have a Road Transport component. This example by government can also have an influence on broader market behaviour.

Contextually this is occurring whilst industry is highly competitive and there is an undue reliance on roadside enforcement as the remedy for non-compliance. While CoR laws have been in place in various forms for some time around the country there is little evidence of any strategy shift in enforcement practice.



Significant results were achieved by the Banking Royal Commission with proper examination of the right levels in the decision chain not consistent and continuing enforcement attention on bank tellers and the occasional branch manager.

Smaller freight operators suffer power asymmetry with

- Labour and fuel costs
- Rates they contract with consignors/consignees
- Are regular price takers
- Consignors/consignees often only negotiate conditions in their favour
- Consignors/consignees treating road freight as a market akin to a commodity

3.3.3 Phoenix Activity

There is an ongoing trend of phoenix activity in the road transport industry. Most of those (phoenix) transport companies are setup with a holding company that owns the fleet (and other associated assets) and a 'one dollar' trading entity that is responsible for invoicing customers and paying wages, superannuation and creditors.

This is actioned in this manner to ensure that if the trading entity faces financial failure the organisations assets and fleet are secure from creditors. This allows related parties to set up new trading entities under phoenix arrangements where contracts and employees are transferred to the new entity and business continues as usual.

The practice of separating out legal entities is also legitimate practice to protect operators from the adverse contracting practices of clients at times.

3.3.4 Master Contracts

Larger transport conglomerates take on master contracts with multinational companies in the retail, building and farming sectors. These large transport conglomerates then subcontract the work out to smaller fleet operators, who complete the work on their behalf at a fraction of the agreed rates.

For example: \$5,000 may be paid to the head contract operator to carry out a trip through multi levels of subcontractors leading to the delivery subcontractor who completes the work for perhaps \$3,000. In this case the head contractor or the multi levels of contractors are sharing \$2,000 to raise invoices while the delivery subcontractor is potentially working to break even, or worse at a loss, putting that operator at risk of breaking laws and ultimately becoming insolvent.

3.3.5 Trading Terms

The vast majority of the costs incurred by small freight businesses must be met before they can bill their customers. These include wages or personnel living costs, fuel, tyres, insurance, finance costs, registration and maintenance. Small freight businesses are therefore very vulnerable to adverse changes in their payment terms, and often have little capacity to negotiate them with large customers.

Larger companies in particular often take 60 – 90 days or more to pay transport operators, while the operators have to pay their employees weekly and other creditors like fuel every 30 days. This causes major cash flow stress on these small and medium sized business which often lead to operators cutting corners to operate. Many have to use costly finance facilities to pay their debts when due which also effects their bottom line and overall profitability.

3.3.6 Chain of Responsibility

Large transport organisations who use subcontractors are now asking the subcontractors to sign contracts and be responsible for Chain of Responsibility (CoR) and trying to shield themselves and their agents, even though they are still giving the instructions on how, when and where the work is undertaken.

Pricing is also a factor of CoR, because if head contractors are not paying enough for sub-contractors to complete the task legally then the system is encouraging non-compliance with regulatory obligations and cost transfers of audit and other requirements.



3.3.7 Lack of Reliable Pricing Calculators

Transport operators need to work with their accountants / business advisors and adopt a structured pricing model to correctly cost work that they are quoting. Many operators rely on their basic costs of goods; wages, fuel and repairs and maintenance but fail to include fixed overheads like administration, vehicle storage and other recognised costs that exist.

A 'good pricing' calculator / model will include all costs down to the last dollar to ensure that a fair and reasonable profit is clearly achievable. (Examples attached at Appendix A & B)

3.4 Remedies warranting consideration

The following remedies have been identified by QTA for the consideration of the Rural and Regional Affairs and Transport References Committee:

3.4.1 Competition

Compliance needs to be ramped up. The Australian Tax Office and ASIC need to be given more power to move in quickly on businesses that do not comply with their statutory obligations.

While the ATO is starting to make headway toward ensuring accountability through one touch payroll and superannuation payment reporting, more can be done.

The government also needs to look towards setting industry schedules relating to costs. There is not enough guidance given. While the governments safe rates legislation was ineffective and poorly designed there needs to be some specification in law about regard to reasonable costs.

3.4.2 Phoenix Activity

Phoenix activity needs to be stopped and company directors and managers including shadow directors who are repeat offenders need to be banned from managing businesses in the industry. Not enough investigative activity is undertaken by ASIC in relation to business failures and directors that continue to manage businesses that fail.

3.4.3 Master Contracts

Companies taking on master contracts or clients awarding these contracts need to be able to be audited by a regulatory body, who can, if necessary, determine that the contractors/subcontractors engaged to do the work are correctly compensated. The government needs a facility where subcontractors can report unfair payments, whereby the regulator can intervene and cancel unfair contracts and subcontractors are exonerated from the terms and conditions.

We do not look at this type of potential intervention as 'setting rates' but about making those in the transport/freight sector aware of their financial and legal obligations, that real costs are considered and that there is a point of reference in the law. What rates people want to define in the market for the provision of their services will vary but should not go below what can be considered the lowest possible cost.

There is still more we can do to improve the conditions for independent contractors, as there is a threat of a working underclass and that costing schedules do not fit all transport operators but be used as a compelling guide.

3.4.4 Trading Terms

Trading terms activity need to be regulated and monitored across Australian Industry as a whole. The issue is across many Australian sectors. Businesses need to be paid within a fair time period and there needs to be a regulatory body that can intervene when companies are not paid within their set trading terms.

3.4.5 Chain of Responsibility

All companies large or small along with clients participating in the freight supply chain need to be equally responsible for Chain of Responsibility (CoR) as their subcontractors. Larger companies in particular need to be stopped from claiming indemnity for CoR breaches in the supply chain and they need to be accountable in relation to paying rates which do not allow contractors to fulfil their own CoR and statutory obligations. While allegedly the CoR law does apply there is little evidence that enforcement and prosecution practice has made any tangible strategy shift.



3.4.6 Lack of Reliable Pricing Calculators

Transport businesses need to engage qualified accountants and business advisors to ensure they are charging rates that cover all outgoings and allow them to operate a business that is profitable. Large users of road transport such as supermarkets, building suppliers and fruit and vegetable markets need to pay fair prices for movement of their freight.

The users of road transport need to be held accountable under CoR laws.

The QTA has advocated developing a mandatory code for the trucking industry under Part IVB of the Competition and Consumer Act (CCA) to address the payment terms issues facing small trucking businesses. The provisions of existing industry codes show it would be possible to construct a code covering payment terms for these businesses, which could for example include payment times – recommended as no more than 30 days from the date an invoice is issued – a prohibition on set offs and pay when paid arrangements, and alternative dispute resolution. Given the essential importance of the Industry to Queensland and Australia’s standard of living we cannot afford a race to the bottom.

QTA recommends the Australian Government implement a mandatory payments code for the trucking industry under Part IVB of the Competition and Consumer Act (CCA) to address the payment terms issues facing small trucking businesses.

4.0 Terms of Reference b) the development and maintenance of road transport infrastructure to ensure a safe and efficient road transport industry

The Government has stated that Heavy Vehicle Road Reform (HVRR) is seeking to fix the poor links between the needs of road users, the charges they pay and the services they receive. The Government also says that a more direct user charging system and a system of reforms to the ways governments plan, fund, invest in and deliver road infrastructure is needed.

The Government has estimated that HVRR could deliver a productivity dividend for the national economy between \$6.5 billion to \$13.3 billion over twenty years. However, the current focus of HVRR is on a system of collecting charges, and not on how governments plan, fund, invest and deliver road infrastructure. Without these accompanying reforms, the estimated benefits are unlikely to materialise.

The current system of funding roads is broken. The Productivity Commission has reported that the current governance, taxation and institutional arrangements for the provision and funding of roads are ultimately unsustainable. Despite billions of dollars in maintaining, expanding and operating our extensive road network each year, parts of the road network are poorly maintained, accessibility in remote and regional areas continues to be a concern, the road network continues to be congested, and heavy vehicle productivity has plateaued for more than a decade impacting on freight transport costs and leading to an anticipated growth in the number of heavy vehicles on the network.

Further we need an integrated solution that draws on the best science, the use of technology, contemporary legislation, and the provision of infrastructure. It is imperative that the government provides an appropriate number of rest areas on all major networks. If it is good enough to mandate a percentage of the road infrastructure spend to public art, it is good enough to apply a percentage to new rest areas.

QTA believes the Heavy Vehicle Road Reform agenda should be reframed with a stronger focus on increasing productivity by improving the provision of roads. This should include:

- Setting clear and measurable service level standards;
- Ensuring revenue from heavy vehicle charges is allocated to the provision of service level standards that benefit heavy vehicle road users;
- Improving the selection, assessment and planning of road funding projects with a focus on delivering service level standards;
- Establishing an independent economic regulator for setting heavy vehicle charges, including toll road and landside port charges; and
- Continuing to set charges on a network basis, to ensure the entire road network and regional areas are appropriately funded.

Finally, there are fundamental differences in the practices and interactions between the Commonwealth and states on the matter of road infrastructure provision. This approach leads to disjointed road provision decisions and less than optimal outcomes in infrastructure provision. QTA encourages all tiers of government to improve the way infrastructure projects are selected and funded. Sound infrastructure investment underpinned by the right projects at the right price are essential for lifting Australia’s productivity.



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

The road freight industry dominates the Australian non-bulk market due to its ability to deliver door-to door, and its competitive advantages in price, convenience, reliability and adaptability to the specific needs of different types of freight.

Meeting the impending freight task will, however, require that the right policies and regulatory environment are in place. For road, the policy imperative comes down to enabling the industry to use the most efficient vehicles for completing the door-to-door task at which road excels.

The review of the Heavy Vehicle National Law (HVNL) currently underway is fundamental to the future productivity and safety of the road freight industry and Australian economy. The new policy settings necessary for industry are also intimately connected to public credibility and industry confidence.

Regulation of the Australian trucking industry has undergone significant reform over the past few decades. The introduction of the Heavy Vehicle National Law (HVNL) and the National Heavy Vehicle Regulator (NHVR) in 2014 marked a turning point, which saw trucking regulation attempt to move from a fragmented approach to a more efficient national approach. Five years on, industry has identified several challenges with the regulations – particularly in the areas of restricted access to vehicles, higher mass limits, fatigue management, oversize/over mass vehicles and mutual recognition to name a few.

Deloitte Access Economics have previously been engaged to analyse the current state of regulations for heavy vehicles in the Australian trucking industry and the potential benefits of improved approaches to regulation. Deloitte found that addressing the policy and regulatory challenges in the use of modern, larger articulated vehicles has the potential to generate significant benefits for Australia's economy.

Deloitte estimates that over the period from 2020 to 2050, there could be:

- \$13.6 billion (NPV) in potential cost savings for trucking businesses
- A further \$0.5 billion (NPV) reduction in transport externalities (such as pollution, noise and greenhouse gas emissions).
- Across the wider economy, this could possibly lead to a decrease in costs for Australian industries of some \$0.9 billion a year by 2050. For consumers and households, the cost reduction is around \$352 million a year in the long run.

The Deloitte Access Economics report provides a strong assessment of how the reforms have failed to lift the industries productivity as intended and further substantial work in this area is vitally needed.

6.0 Terms of Reference d) the training and career pathways to support, develop and sustain the road transport industry

The QTA is committed to supporting the transport and logistics industry in attracting new entrants, retaining existing workers and upskilling their workforce. There are a range of projects that the QTA is leading to support the industry in building capacity and capability within new and existing workforces.

Since 2014, the QTA has been the Vocation Education and Training Industry Organisation (VETIO), funded by the Queensland Department of Small Business Education and Training. As a VETIO, the QTA is responsible for supporting ongoing reform and operations of the vocational education and training system relating to the contestable skills market in Queensland. VET 4 T&L is an industry engagement program covering all sectors of industry – road transport, passenger transport, logistics, rail, aviation and maritime.

The trucking industry faces a shortage of skilled heavy vehicle drivers (both the quantity and quality of drivers required) due to the industry's aging workforce, the increasing freight task and competition from other industries, such as mining. The impact of this skills shortage is increased by the variable outcomes and quality in driver training.

The average age of truck drivers is 47 years, and 97.5 per cent of those drivers are men. The ageing of the workforce and attraction of the industry to potential employees is undoubtedly also a result of an outdated negative image of truck drivers in Australia.



As a result, through the VET 4 T&L program, the QTA is actively working to encourage more people to enter the industry by promoting the diversity of employment options in the industry, projecting future skill needs and advertising industry career paths. The QTA is a member of the Transport and Logistics Working Action Committee (TLWAC) facilitated by the Queensland Department of Transport and Main Roads. QTA initiatives include the 'QTA/Daimler Emerging Leaders Scholarship Program', 'Women Take the Wheel Program', 'GenR9 Youth Engagement Program', 'Digit@I Futures Program' and an extensive calendar of events promoting greater gender balance including the 'QTA Women in Transport and Logistics' event.

The QTA is also working to retain existing industry workers by working with employers to promote the industry within the community, upskill workers, offer professional development and adding value to employment packages (e.g. offering health and wellbeing benefits, including offering private health insurance).

The QTA is currently focussed on the need to upskill drivers and employees of the obligations flowing from the Heavy Vehicle National Law (HVNL), for example the NHVR Permit Portal and responding to digital disruption and the increased uptake of technology. Digital disruption relating to reducing time and costs spent on data entry, providing customers with real time access to track products, improved cost tracking on a job by job basis, and improved engagement with a mobile workforce will present increased training needs for industry. This includes training in the use of new devices and software, and in device and data management.

The QTA will continue to work with Government to:

Raise industry awareness of and participation in:

- Government initiatives such as outlined within Working Queensland that are available to industry under the Annual VET Investment Plan; and
- National training product development to ensure consideration of the Queensland context

Provide advice to Government, throughout the period of the agreement on:

- Emerging skill needs that may need to be considered for immediate inclusion on the Queensland Subsidy List or for industry specific skilling strategies;
- Suitability of potential pre-qualified suppliers through the provision of a letter of support where the supplier believes the organisation is suitable in meeting the needs of training delivery in the industry;
- Suitability of pre-qualified suppliers in relation to their connectivity to industry needs when specifically requested by the department; and
- Suitability of pathways and models of training delivery when requested by the department.

Provide support to Government when required, with:

- Investigations on qualification under or over delivery, which may affect student's access to job outcomes or relevant skill supply to industry;
- Investigations on PQS numbers where student access may be affected;
- Performance reviews of investment in training; and
- Exploration of training activity and its relevance to industry.

Provide support to industry with:

- Business cases for projects relevant to other programs and strategies in the VET investment plan and qualifications or skill set inclusions on the Queensland Training Subsidy List;
- Skill set endorsement at the national level; and
- implementation workforce development activities that will assist in qualification attainment, skill utilisation, employment outcomes, and uptake of specific skilling strategies.



7.0 Terms of Reference e) the social and economic impact of road-related injury, trauma and death

Safety is of paramount importance in the road freight industry and it covers a broad range of workplace activities. The prevailing trend across Australia is of a reduced incidence of major accidents. QTA is working tirelessly and collaboratively with the industry, unions, relevant organisations and the community to reduce motor vehicle accidents and injuries in the transport industry. Identified risk areas for the industry including:

- **Time pressures.** Tight deadlines within the transport industry can make drivers feel pressured to speed and skip breaks.
- **Shift work, fatigue and physical fitness.** Shift work is common in the road transport industry and working irregular hours can cause fatigue and have adverse effects on health and safety. Transport work, especially driving, offers workers only brief periods of physical activity, for example when they are loading and unloading. This means workers are at a higher risk of being overweight or obese, are less active and sit for long periods.
- **Mental Health Wellness and Financial Stress.** More than half of all Australians identify finances as the leading cause of stress. Financial stress is identified as a significant cause of underperformance in the workplace. Up to one third of the workforce may be underperforming due to the physical and mental impacts of financial stress.
- **Vehicle design.** Transport drivers' workplace is their vehicle, and so the design of the seat and vehicle controls as well as the duration and frequency they drive will affect their risk of musculoskeletal discomfort. Vehicle design and driving over rough roads can increase exposure to vibration, which increases risks for disorders to the musculoskeletal system and organs.
- **Manual handling of heavy weights.** Loading and unloading vehicles often involves lifting heavy weights.
- **Working at height.** Drivers of trucks regularly climb onto and off their vehicle and falls are a cause of serious incidents. If the worker is required to access the load from the top of the vehicle appropriate fall protection needs to be in place.
- **Gases and fume exposure.** Workers in the transport industry are more likely to report being exposed to airborne hazards such as gases and fumes than workers in other industries.

To address these issues, QTA has an extensive range of member resources and is currently administering projects to address these issues including 'Eyes on Fatigue Project', 'Heavy Vehicle Safety Around Ports Project' which includes a technology pilot and health and wellbeing initiatives and also offering the 'My Health for Life – Workplace Program'. QTA is also involved in developing a program to support the mental health of employees in the road transport industry.

Finally, road safety statistics show that a large number of accidents between trucks and light vehicles are due to mistakes by the light vehicle driver. Despite this, educating light vehicle drivers about how to share the road safely with trucks has only received sporadic policy attention in Australia. To improve safety for all road users, including heavy vehicle drivers and the road transport industry, light vehicle driving training standards and competencies should be reviewed to include awareness of sharing the road safely with heavy vehicles.

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

Technology can be used to boost safety, productivity and improve the way the Australian freight task is moved. It is happening in a number of areas: vehicle improvements; road and network management and enforcement; and charging systems. Technology can aid traffic flow and reduce travel times, allowing efficient business to take place for the benefit of the Australian economy as a whole.

However, QTA wishes to highlight that technology needs to be implemented in a cost-effective way. With the introduction of new technology there can be unintended consequences that need to be considered. If overlooked, the introduction or mandating of technology can have detrimental effects on the transport operator's business and general productivity.

New technology for vehicles is best utilised by encouraging business demand. By promoting market based solutions, it ensures technology is fit for purpose and utilised where demand is sufficient; allows innovation to thrive; and the cost is borne by those with a desire to pay for it voluntarily, not enforced through regulation.



Experience shows that where technology is mandated in regulation, it is in danger of burdening users and operators financially; working ineffectively thereby not achieving objectivities and stifling production; and actually limits technological progress in the longer term.

Accordingly, technology should be utilised by the market where appropriate, not instigated from outside by regulators. To do so risks unnecessarily burdening industry and the Australian economy restricting productivity and limiting technological enhancement.

Potential targets for technological improvements in road travel and freight operations include:

- Real time traffic information communication to GPS services and UHF radio;
- Installation of UHF cut-in systems on locomotives to enhance level crossing safety by broadcasting warning to motorists;
- Freight priority systems to improve all traffic flow; and
- Warning systems for heavy vehicles in high risk situations.

The QTA is currently undertaking two projects that involve piloting two types of fatigue monitoring technology:

1. Heavy Vehicle Safety Around Ports Project – 24 month pilot measuring the effectiveness of wearable fatigue alertness technology targeting heavy vehicle drivers using the Port of Brisbane precinct; and
2. Eyes on Fatigue Project – two-year project which will investigate and ascertain the effectiveness of emerging driver monitoring technology in reducing the incidence of driver distraction, inattention and fatigue episodes within the HV industry.

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

The QTA wishes to work with all tiers of Government and their agencies to ensure the right policy, regulatory and infrastructure settings are in place for the road transport industry to be able to recover to a more financially viable position and continue growing in the future.

10.0 Contact

QTA welcomes the opportunity to present to this submission in person at a Rural and Regional Affairs and Transport References Committee Inquiry hearing.



APPENDIX

APPENDIX A – Truck Costing Per Hour Calculator

[Hourly Rigid Costing Calc \\$70 Per hour](#)

[Hourly Rigid Costing Calc \\$80 Per hour](#)

[Hourly Rigid Costing Calc \\$90 Per hour](#)

APPENDIX B – Truck Costing Per KM

[Per Km Costing \\$4 Loaded One Way Return](#)

[Per Km Costing \\$5 Loaded One Way Return](#)

[Per Km Costing \\$6 Loaded One Way Return](#)