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IMPACT OF THE BUS SAFETY ACT ON COMMUNITY TRANSPORT SERVICES

RESPONSE TO THE REGULATORY IMPACT STATEMENT

SUBMISSION TO PUBLIC TRANSPORT SAFETY VICTORIA

BY

VICTORIAN COMMUNITY TRANSPORT ASSOCIATION

JULY 2010

REGISTRATION

The VCTA considers that the requirement for non-commercial services using small buses to be registered will not have a significant impact on the community transport sector. A number of providers using larger vehicles with more than 13 seats may in fact benefit from this new regulation as they will no longer be required to be accredited operators and therefore will no longer be required to pay the licence fees.

ANNUAL SAFETY INSPECTIONS

While the VCTA supports the principle of annual safety inspections as a means of ensuring vehicle safety in the industry it believes that this requirement could place a significant burden on some community transport providers using small buses; particularly those located in rural areas. The issues in dealing with this requirement are availability of licensed testers and the location of licensed bus testers leading to increased cost of testing for rural services.

The new act states that small buses must undergo an annual safety inspection by a licensed bus tester; it is not clear in the legislation or the Regulatory Impact Statement (RIS) who will be licensed to test 10 – 12 seat buses. Licensed Vehicle Testers, LV accreditation, are distributed across Victoria and are able to provide roadworthy inspections for this class of vehicle however there is confusion as to whether they are accredited to inspect vehicles used for passenger transport. Clarification on this issue is sought from PTSV.

If the required safety inspections are to be carried out by licensed bus inspectors there is the question of there being sufficient numbers in Victoria to deal with the predicted increase of over 3,000 inspections per year. Distribution of inspectors across Victoria is also an issue for some rural community transport providers.

VCTA believes that the estimated cost of the annual safety inspection; estimated to be \$220, in the RIS will be significantly more for rural services using small buses. Licensed testers are not always available in small towns, for these services it could mean a cost of up to \$400 per vehicle per year as a result of the extra travel required to access accredited testers and therefore the extra staff time and running costs associated with the extra travel.

Feedback from other VCTA members in this area has been about the inconvenience of having to take a highly utilised vehicle out of service for yet another day for the annual inspection. This provider regularly replaces their vehicles which are then serviced under warranty; the annual inspection would require that the bus be out of service for another day each year. In this case the cost to the small provider who has four small buses could be an extra \$900 per year plus loss of four days of operation.

VCTA suggests that in cases where a licensed inspector is not readily available or accessible that the registered operator be required to provide evidence of regular servicing of the vehicle as per manufacturers recommendations as an alternative to annual inspections.

INFORMATION /MAINTENANCE MANAGEMENT SYSTEMS

Although not required to be kept by registered operators the VCTA views keeping records in the areas mentioned as good practice and would encourage all services to maintain such systems. Many community transport services are located within local government or the health and welfare sectors and are required to keep records and have risk management processes for accreditation purposes.

INCIDENT REPORTING

The VCTA promotes risk management and investigation of incidents through the Victorian Operational Guidelines for Community Transport. While there is concern from some operators that investigation and reporting of minor mechanical incidents could be time consuming the VCTA believes that it is important to encourage investigation of any incident causing or having the potential to cause personal injury or damage to property.

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