

Submission on CPVV's draft monitoring, compliance and enforcement policy

Please indicate your level of agreement with the following statements:

The policy adequately promotes compliance with, and enforcement of, industry laws. - Neither agree nor disagree

The policy adequately sets out proportionate, cost effective and efficient options for monitoring and promoting compliance with, and enforcement of, industry laws. - Neither agree nor disagree

The policy adequately sets out how CPVV will use those options to monitor and promote compliance with, and enforcement of, industry laws. - Agree

The policy provides appropriate guidance on the measures to be adopted by the regulator to promote compliance with and enforcement of the industry laws. - Agree

Please explain your ratings and provide suggestions for improving the policy.

As a converter of vehicles for wheelchair access we are concerned that within the normal process of a build that the completed taxi may exceed the vehicle manufactures specification. In the majority of cases the Engineers Report is issued at the completion of the conversion from bus to WAV. After that a number of additions are included ie LPG conversion, additional protective bumpers, steps and the taxi equipment . As the Engineers report is based on the vehicle as inspected its configuration while legal at that point, now complete with additional equipment, this can be over the manufactures specified GVM and or front and rear axle loads. In these cases the vehicle will be operating out side of the manufactures specification and will impact on the safety of the vehicles operation and those travelling in it. It is our recommendation that all WAV taxi should be weighed as part of the inspection process to ensure when at full

capacity it is under the manufactures GVM. In the case of axle loads we would be happy to discuss how this can be calculated to ensure that the taxi is with in the manufactures specifications.

The policy provides appropriate guidance on CPVV's exercise of its:

Monitoring and compliance powers - Agree

Investigation powers - Agree

Enforcement powers - Agree

Please explain your ratings and provide suggestions for improving the policy.

These powers are important , but to be fully effective we feel it necessary that the inspectors have the in depth knowledge of the conversion process. As was demonstrated in Queensland were a number of WAV Taxi that had been engineered were found to be non compliant. Our recommendation is that all WAV Taxi have a full inspection to ensure that correct build process have been followed and is compliant.

The policy provides appropriate guidance on CPVV's exercise of powers under the following sections of the Road Safety Act 1986 by authorised officers or the regulator; and in relation to commercial passenger vehicle services:

s13- Power to inspect motor vehicles and trailers - Strongly agree

s14(1) - Defective vehicles - Strongly agree

s84ZY - Power to inspect motor vehicles - Strongly agree

s77 - Power to prosecute - Strongly agree

s88 - Traffic infringements - Strongly agree

Please explain your ratings and provide suggestions for improving the policy.

General feedback

It is our belief that the CPVV has the opportunity to create a model that would better co-ordinate the various stakeholders in the building of a WAV taxi to ensure that the safest vehicle is being offered. That the initial conversion allows for the completed WAV Taxi to meet manufactures specification.

Upload your submission to this consultation.

No file specified

What is your interest in the consultation?

Other industry participant

My submission

can be made public

Are you happy to be contacted regarding your submission for any of the following?

to provide further or clarifying information; to receive information on how my submission was considered; to receive information on progress of the policy

Please provide your email address to receive confirmation of your submission

markj@norden.com.au


CPVV Privacy Statement

Commercial Passenger Vehicles Victoria (CPVV) is committed to protecting personal information provided by you in accordance with the principles of the Victorian privacy laws.

The personal information you provide as a result of making this submission will not be circulated outside of CPVV unless you have included personal information in your submission and have

consented to your entire submission being made public. In addition, the only purpose for which CPVV will use your personal information is to contact you about your submission and the final policy, where you have indicated that you can be contacted for this purpose.

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