

24 August 2021

Heavy Vehicle Charges Determination
National Transport Commission
Level 3/600 Bourke Street
MELBOURNE VIC 3000

via email: enquiries@ntc.gov.au

Dear Sir / Madam

Heavy vehicle charges determination: consultation regulation impact statement (C-RIS)

We welcome the opportunity to comment on this C-RIS.

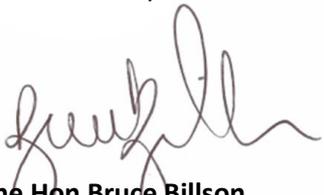
We support the move away from the current practice of revisiting heavy vehicle charges each year to a multi-year price path. Small businesses suffer from cumulative regulatory burden and as flagged in the C-RIS a multi-year approach should reduce administrative and compliance costs for small businesses that operate heavy vehicles.

We share the concerns canvassed in the document that to move immediately to the full recovery of allocated infrastructure costs would impose “an unreasonable burden” on heavy vehicle operators and not give them time to incorporate the cost rise into contracts. This is particularly so with small business operators of heavy vehicles who may decide to absorb some or all of the increase so as to remain competitive. Now is not the time for abrupt increases in charges to small businesses, with the prospect of uncertain economic times in the short to medium term. In light of this, we would encourage a more gradual approach be adopted.

We therefore are of the view that small businesses would be better able to accommodate these price increases were they in the form of a defined multi-year price path that incorporates smoothed price rises rather than an initial jump.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mike Kearney on 02 6213 7443 or at michael.kearney@asbfeo.gov.au.

Yours sincerely



The Hon Bruce Billson
Australian Small Business and Family Enterprise Ombudsman