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**From:** [REDACTED]  
**Sent:** Tuesday, 17 November 2020 8:37 PM  
**To:** Exemptions  
**Subject:** CPB Contractors – N10000537 – Submission

I am happy to endorse CPB Contractors submission to insert an annual audit requirement for subcontractors deemed to have a legal obligation under Heavy Vehicle National Law (HVNL).

CPB Contractors should be applauded for the simplicity of their HVNL model and due diligence in ensuring that subcontractors have safety management type systems in place as the law prescribes to manage their compliance by inserting this condition

To have a large selection of pre-determined quality auditors with knowledge and skill in this specialized area further ensures better safety outcomes. To allow any auditor to be on the list can actually have a detrimental effect as I have witnessed with audit reports from auditors not familiar with HVNL that are actually in conflict with the HVNL and have a real possibility if followed, of placing drivers on the road that could be severely effected by fatigue, which is one of the biggest killers on our roads.

The list of auditors is only limited to auditors that can demonstrate knowledge and experience in HVNL I do not see how this could be anti-competitive, the benefit of the safety far outweighs any suggestion of third party forcing.

The intent of the HVNL is to either control or influence other supply chain members to ensure compliance, CPB have overachieved in this without overstepping allowing the subcontractor to manage their own business the way they see fit as long as a third party auditor has evidence based validation that the controls are effective.

I have been a consultant for over a decade previously working for the RTA, DOT WA and RMS all my clients are excited by this proposal and many intend to follow CPBs lead further influencing the supply chain

With transport having numerous risks killing hundreds of people HVNL and CPBs approach is well over due and both the federal government and CPB deserve recognition for the proactive approach they are taking.

[REDACTED]  
HVNL Advisor/Lead Auditor

**KJ Transport Consultants**

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