

25 July 2025

Steven Miller  
 Director – Service Delivery  
 National Heavy Vehicle Regulator  
 Level 6/100 Skyring Terrace, Newstead QLD 4006  
 Cc: Niccole Priest, Rochelle Matthews  
 VIA EMAIL

**RE: HVIA feedback on the NHVR’s PBS assurance program**

Dear Steven,

HVIA appreciates the chance to be involved in the NHVR’s development and roll-out of the new PBS assurance program.

After taking part in one of the webinar sessions held by the NHVR in mid-July and seeking member feedback, I would like to provide the below summary of member views, alongside explanatory comments and our recommended solutions for NHVR’s consideration.

Member views	Notes / solutions
The proposed minimum audit notice period of 5 days is too short.	Many small businesses schedule their work (and travel) commitments several weeks/months in advance. Short notice periods may be incredibly disruptive; consider a minimum notice period of 4 weeks (i.e. 20 business days).
The proposed maximum audit timeframe of 2 days of in-person auditing may be excessive.	Combined with the above, a relatively lengthy in-person audit adds to the disruption and may unfairly reduce a business’s available billable hours. Consider options to reduce in-person auditing time.
The proposed cadence for annual audits is out of line with the NHVR’s other assurance rules.	The National Heavy Vehicle Accreditation Scheme (NHVAS) specifies biennial audits as a baseline, with the option to extend to triennial based on performance. Consider bringing PBS assurance in-line.
There has been no chance for the industry to review the proposed audit materials, hence no meaningful consultation is being conducted.	The NHVAS gives clear instructions on the level of documentation and detail required to demonstrate conformance. PBS assessors and certifiers keep detailed notes and records, but remain unsure if they will be considered to meet the NHVR’s audit requirements. Consider pausing audit activities and allowing a 6-8 week period for the industry to review the developed audit checklists/materials and provide feedback.

These views do not deviate from what has been HVIA’s position since being advised of the NHVR’s intent to commence a PBS assurance program some months ago.

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As explained in previous correspondence, HVIA does not oppose a PBS assurance program, but remains confused by the NHVR's apparent urgency in commencing audits shortly after announcing the program. That urgency is particularly confusing as the PBS scheme has operated without such an assurance program, since before the creation of the NHVR itself.

HVIA believes that the assurance program would be workable and accepted by members if reasonable solutions to the issues identified above are found.

I will publish the above views in an article in our weekly newsletter on Wednesday 30<sup>th</sup> July.

I am more than happy to discuss these views and solutions with you and your team (cc'd to this correspondence) over the coming weeks. I look forward to hearing from you.

Yours sincerely,

A handwritten signature in blue ink that reads "Adam Ritzinger". The signature is written in a cursive, flowing style.

**ADAM RITZINGER**  
**CHIEF TECHNICAL OFFICER**