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To whom it may concern.

This is a submission to try and get rules in relation to trailers up to 9 tones ATM changed. In particular the rules governing braking systems and the current ADRs they must meet. Currently in Australia and Australia only if the ATM of any trailer exceeds 4.5 tone it must use an ADR approved breaking system, which is fine. Its just that the only breaking system of that type that any trailer manufacture can currently use is Air over S cam brakes. In a marine environment where the trailer wheels and breaking system are submerged in water to launch and retrieve the vessel these breaking systems are rendered completely useless, and unsafe the first time they are submerged. Why are Australian Boat trailer builders forced to use an unsafe and in effective braking system just to make their trailers legal, when every other country in the world can use an Electric over Hydraulic or Air over Hydraulic breaking system that is safe and effective after thousands of submersion's ? It is my submission that we keep the current ADR just change the ATM that it is applied to. Eg from 4.5 tone to 9 tone, this would solve quite a number of problems.

As the law stands now anyone can tow a trailer up to 9 tone as long as it is within the towing vehicles capacity weather that be light truck medium ridged or heavy ridged. The types of trailers i am talking about here are large boat trailers - Enclosed race car trailers and bigger horse floats, that are typically towed by large American pickups or medium size Japanese trucks like Isuzu and Hino. This would bring our breaking laws into line with our towing laws, make our roads and road users safer, and reduce the ridiculous cost imposed on manufactures and end users now, by having to comply with current laws. I have been corresponding with the department of infrastructure (heavy vehicles) They have advised me that the cost involved with making the brake systems im talking about compliant with current ADR requirements has been to cost prohibitive for anyone to attempt, quite possibly hundreds of thousands of dollars if not millions. Not because the breaking systems are no good. I can think of no logical reason not to change / amend or alter the current ADR 38 to bring us in line with the rest of the world, but more importantly for the safety of our road users who are currently forced to tow trailers around that are unsafe and dangerous, because the braking system they are forced to use to make their trailers legal.

Best regards

**Norm Cowan**  
GENERAL MANAGER

SWIFTCO TRAILERS PTY Ltd