



National Bulk Tanker Association

10th July 2020

Response to National Transport Commission

Government Access to vehicle-generated data

Background

The National Bulk Tanker Association Inc (NBTA) is an industry association representing bulk road tanker operators, suppliers and consignors in Australia. Formed almost 40 years ago its members include the largest bulk tanker operators in the country. In total there are an estimated 20,000 bulk tankers in operation on Australian Roads. Most of these vehicles are prime mover and trailer combinations but there is also a significant number of smaller rigid tanker units in operation as well. Over half of all bulk tankers carry dangerous or hazardous goods.

Most of our members tanker units have a range of on-board telematics to monitor vehicle performance. Only a small number participate in the Intelligent Access program although an increasing number are now designed and operating as Performance Based Standards (PBS) approved units.

In the last 12 months a number of NBTA members participated in a data gathering exercise sponsored by Austroads and run by Transport for NSW. The project required dangerous goods tanker operators to provide a data feed on vehicle position so that a picture could be assembled of major dangerous goods routes in the Sydney. It relied upon operators authorising their telematics providers to provide this information, and for the telematics providers to be able to configure this data in a consistent manner and in turn provide this data to a third party for analysis.

This project was voluntary. It posed a number of technical, cost, privacy and regulatory challenges which were overcome. The end result (yet to be published) will provide a clearer picture of where dangerous goods move and where road planners need to pay attention to existing or potential future bottlenecks in the road network. It is a good example of a collaborative project.

NTC paper

The NTC paper poses [19 questions](#). A number of these are very broad questions and beyond our members competency.

In summary, our Association sees the major issues as revolving around commercial risk and trust as well as the costs and benefits that flow from this work.

Commercial risk

There are real commercial concerns in the sharing of data and the risk that this provides.

- Cyber security is a real risk and leading companies in Australia have been compromised in recent months. The risk of opening up systems to provide data to third parties can exacerbate that risk. Any demands that could produce a cyber security risk would not be supported.
- Privacy is also a major concern with commercial operators. Sharing of data can risk compromising their commercial IP. This may be of a lesser concern for car drivers but for commercial road transport operators it provides a real commercial risk. Any data supply would need to avoid seeking data that could risk privacy or commercial breaches.

Trust

There needs to be mutually agreed guidelines as to the collection, processing and use of the data.

- An understanding of the competing needs of using data for informing future transport policy and safety programs, as opposed to informing or using for compliance and enforcement, are major issues. These issues can be overcome with appropriate discussions and agreements but need to be front-end discussions so that the purpose of the data gathering, and the end use of that data is mutually agreed.
- The data aggregation and processing are also a challenge. In-sourcing versus out-sourcing will cause much debate and whilst our Association does not have an answer to this question, we see it as a further commercial risk. There are examples where data gathering has already occurred in Australia such as the Transport Certification Australia Intelligent Access Program model, but these come with considerable costs including technology mandation and this then drives to the question of costs and benefits.

Costs and benefits

There needs to be a discussion around the costs of any proposed process and also the benefits and how each is borne by respective parties. There is no single system for telematics that allows easy aggregation of data. This then begs the question of what data to be collected and at what cost.

Bulk Tanker operators are likely to be well down the telematics-enabled end of the spectrum, however the multiplicity of systems and service providers means that there are real costs in collecting and analysing data. In order to discuss those costs there also needs to be a discussion of benefits and potential incentives for the provision of data. There are numerous examples from past experience where incentives were provided in order to achieve change. This trade-off needs to be part of the discussions. For example, agencies could offer to pay or subsidise the supply of certain types of data and could also offer processed data in return. This was the negotiated outcome of the Transport for NSW DG

study where each company participating was provided with an analysis of their own data in exchange for collaboration.

This question also drives to the point of whether Government intervention is needed in order to achieve certain outcomes. Industry are already early adopters of many technologies that enhance safety, productivity and environmental outcomes. New heavy vehicles are very “technology enabled,” and with driver technologies to manage fatigue and distraction it would seem that industry has already done its own cost-benefit analysis on the benefits of data in enhancing their performance in key areas. The question for Government is how to further encourage this trend and then to tap some of the higher-level data feeds that can in turn enhance knowledge around road design and safety outcomes.

Concluding remarks

The NBTA supports **Option 2 from the NTC’s paper**: Establish a data exchange partnership between industry and government that will identify opportunities for exchanging vehicle-generated data as well as develop standards and consider proof of concept.

We would welcome further discussion around this option and the opportunity to be involved in progressing this worthwhile data exercise.