

Access – short form submissions received on HVNL review microsite

V4: 2/12/2020

| Contribution ID | Date | Name | Organisation | Which access options do you prefer and why? | Which access options do you least prefer and why? | Do you have any further comments about access? |
|------------------------|-------------|--------------|---------------------|--|---|--|
| 720 | 21/08/2020 | Vince Wright | Auzzie Pilot | <p>2 Tier</p> <p>"New" pilots require a period of training on the road, further to the course training that is completed to gain accreditation and possibly their industry involvement. Contrary to popular belief truck drivers do not make good pilots as soon as they change jobs. They have to stop being the truck driver and learn the safety job.</p> | <p>Single Tier</p> <p>Persons with no transport experience are able to gain accreditation and enter an industry not knowing the practical side of that industry. Examples: The smell of a hot tyre or binding brake, the condition of the securing chains and straps, turning radius of an extended trailer, braking distances etc. A classroom or training scenario is totally different to on job training.</p> | <p>An inclusion clause is inserted into the HVNL to cover Pilot Vehicles. At the moment you ask NHVR about pilot vehicles and they refer you to the state regulator. If the question is "too hard" the states refer you to the NHVR.</p> <p>A specific colour be allocated to Pilot Vehicle beacons as most road users take you to be service vehicles and ignore you. I suggest that Transport Compliance be red and blue and pilot vehicles take on Magenta.</p> <p>I know police are rather protective of their colours but compliance have little need to be operating at high speed as their intercepts are usually within site and the lights are used for protection around a stopped vehicle. The use of wig-wag lights is an advantage but from practical use amber has a</p> |

| Contribution ID | Date | Name | Organisation | Which access options do you prefer and why? | Which access options do you least prefer and why? | Do you have any further comments about access? |
|------------------------|-------------|------------------------------------|------------------------------------|--|--|---|
| | | | | | | greater safety factor and attention getting than white. |
| 746 | 3/11/20 | Residential Traffic Safety council | Residential Traffic Safety Council | | | Permits on local roads (council managed) need to be transparent. Heavy vehicles on local roads affect residents. In NSW, many councils do not manage trucks on local roads well, and load limited roads have heavy vehicles every day. There is a regulatory gap if councils are not managers (the verb manage), as Traffic NSW does not touch local roads. Why did an OSOM vehicle Travelling without a permit on my 5 tonne road bring Down a power line and not get fined.. yet if I park near where these trucks enter illegally, council fines me? |
| 764 | 20/11/20 | Leah Stapleton | Qube Logistics | 9.1A Increase GML to CML for all operators, given manufacturing improvements with Safety (EBS, ABS etc). 2 tier approach simplifies the industry (GML and HML). Yet as part of the HVNL review, for Higher Mass Limit accredited operators increase / expand capacity and | 9.1B Increase GML to CML enrolled operator, would eliminate the key benefits of NHVAS, Trucksafe & WAHVAS etc. The industry has built a strong accreditation system (community), NHVR enrolment would be a government approach. 9.1C Approved OBM | Submission 1 of 2 on further Comments 9.2a Consider this as being the primary reason for the NHVR, recognize precedent and expand process for low risk application. Fundamentally the NHVR was established to standardize & remove the |

| Contribution ID | Date | Name | Organisation | Which access options do you prefer and why? | Which access options do you least prefer and why? | Do you have any further comments about access? |
|------------------------|-------------|-------------|---------------------|--|--|--|
| | | | | network must occur. As similar improvements (safety) will otherwise not be recognized. | approved CML. Given that the RIS can't verify impact if this was approved, and accreditation levels have remained similar, what is the real impact? Duties cover Mass loading via COR. OBM would simply add further costs to the operator. | <p>inconsistency.</p> <p>9.2c as above (Geospatial map given)</p> <p>9.2d Risk based approach to vehicles classes again requires unanimous agreement from all states. Is this going to happen?</p> <p>For example 30m network in South Australia, yet others still require permitting under the PBS scheme.</p> <p>9.2f - Under the HVNL there are no implications for road managers from access decisions that exceed statutory timeframes. In addition, decisions by road managers are open to internal review only, but with the NHVR's decision subject to external review.</p> <p>9.3a - Statutory timeframe, deemed referral and refusal for nil response contains two sub-options that relate to proposed amendments to statutory requirements. The existing period of 28 days is retained in each, which does not align with industry demand hence NHVR as the industry regulator is directly affecting supplier chains with delays. This area has</p> |

| Contribution ID | Date | Name | Organisation | Which access options do you prefer and why? | Which access options do you least prefer and why? | Do you have any further comments about access? |
|------------------------|-------------|--------------|---------------------|--|---|--|
| | | | | | | been reviewed previously with little change, are we simply adding more layers but not resolve the fundamental issue timeline for approval or refusal of access. Fundamentally the NHVR was established as the one-stop shop hence aimed at reducing access processes. Surely if a HNVL review subjecting further NHVR involvement would be looking at statutory timeframe as a key agenda? |
| 772 | 27/11/20 | Philip Roper | O'Brien Traffic | | The RIS does not make a case for the reason to grant CML rights to vehicles that are not enrolled in the NHVAS. Section 9.4.2 of the RIS states that CML is only available at present to operators who will enrol in NHVAS for a given vehicle, but it does not explain how this constitutes a problem. In my experience, operators who want to use CML mass limits will enrol, and tend to see it as an easier option than HML. The use of CML is not a reason to pursue PBS approval - CML is available without any permit at all. Further, enrolment in NHVAS is designed to improve maintenance, which leads to | |

| <i>Contribution ID</i> | <i>Date</i> | <i>Name</i> | <i>Organisation</i> | <i>Which access options do you prefer and why?</i> | <i>Which access options do you least prefer and why?</i> | <i>Do you have any further comments about access?</i> |
|-------------------------------|--------------------|--------------------|----------------------------|---|---|--|
| | | | | | safer and less damaging vehicles. Removing this requirement would be a backward step. | |

Assurance – short form submissions received on HVNL review microsite

V1: 23/11/2020

| Contribution ID | Date | Name | Organisation | Which assurance options do you prefer and why? | Which assurance options do you least prefer and why? | Do you have any further comments about assurance? |
|------------------------|-------------|----------------|---------------------|--|---|--|
| 762 | 20/11/20 | Leah Stapleton | Qube Logistics | <p>7.1c Operator licensing of all operators - establishment of capability and responsibility. Thus further supporting the COR structure whereby all operators are deemed responsible within the supplier chains. Given the NHVAS, Trucksafe & WAHVAS etc are well established and demonstrate improved safety, changes would simply add a further administrative burden to the operator. Safety management systems are well established within the industry, hence transition to Operator licensing would be achievable.</p> | <p>7.1a Voluntary Enrolment - NIL impact on operators who can't show NHVR a basic Safety Management System (risk control). Additionally, the voluntary enrolment option is Null & Void for operators who require access permits or notices.</p> | <p>Data shows the current structure of accreditation is improving safety in the industry (crash data etc). Adding a license requirement eliminates the current state of play, where we see entry of sub par unskilled operators into the industry. Furthermore, the aim of RIS is to establish to ensure legislation is current to industry, safety Management System capability and responsibility via licensing sets the standard.</p> |

Duties – short form submissions received on HVNL review microsite

V4: 23/11/2020

| Contribution ID | Date | Name | Organisation | Which duties options do you prefer and why? | Which duties options do you least prefer and why? | Do you have any further comments about duties? |
|------------------------|-------------|--------------------------|--|---|--|--|
| 714 | 20/08/2020 | Sean Minto | Supply Chain Safety Excellence | <p>4.1 Expand the application of the primary duty to parties who influence the safety of transport activities.</p> <p>I agree this provides the best approach to capturing a broader range of other parties under this umbrella.</p> <p>I would however recommend defining the term in the s5 Definitions including a list of examples.</p> | <p>4.1b Add specified parties to the defined list of CoR parties.</p> <p>I agree this may be to prescriptive and as such limiting in nature. There is a risk not all parties may be identified now or in the future.</p> | <p>I think some of the definitions of the existing parties in the chain of responsibility could be more clearly and better defined, for the Scheduler is one that creates confusion, in particular the scheduling of goods. If a consignor "tenders" a load for transport by a heavy vehicle to be picked at a certain time (within reason) and delivered to a destination by a certain date/time (taking into consideration standard journey times) does this make them a scheduler? As it is currently unclear with many consignors.</p> |
| 717 | 20/08/2020 | Dr. Santosh Kumar Mishra | Population Education Resource Centre (PERC), | <p>The Heavy Vehicle National Law (the HVNL) should ensure that no vehicle shall be driven, stopped or parked</p> | <p>The HVNL should necessarily discourage, through appropriate measures (using existing national laws and</p> | <p>The HVNL should ensure that:</p> <p>(a) While approaching an uncontrolled pedestrian</p> |

| Contribution ID | Date | Name | Organisation | Which duties options do you prefer and why? | Which duties options do you least prefer and why? | Do you have any further comments about duties? |
|------------------------|-------------|--------------|---|--|---|---|
| | | | Department of Lifelong Learning and Extension, S. N. D. T. Women's University, Mumbai, India (Retired on June 30, 2020) | <p>on a road or in a public place in such a manner as is likely to endanger the safety of, or cause inconvenience to, other road users.</p> <p>Reasons/Rationale: The above mechanism will ensure that there is hassle free flow of vehicular traffic on roadways.</p> | <p>regulations, unnecessary use of horn by drivers.</p> <p>Reasons/Rationale: Unnecessary use of horn causes (add to) noise pollution which is health hazardous for people of all age-groups,</p> | <p>crossing, the driver shall slowdown, stop and give way to pedestrians, users of invalid carriages and wheelchairs.</p> <p>(b) If traffic has come to a standstill, the driver shall not drive the vehicle on the pedestrian crossing if he is unlikely to be able to move further and thereby block the pedestrian crossing.</p> <p>(c) When any road is provided with a footpath or cycle track, no vehicle shall drive on such footpath or track, except on the directions of a police officer in uniform or where traffic signs permitting such movement have been displayed.</p> |
| 718 | 21/08/2020 | Geoff Taylor | | | | I have recently been driving in the Pilbara. It is essential to know the length of a road train you intend to pass. Or the length of the train |

| Contribution ID | Date | Name | Organisation | Which duties options do you prefer and why? | Which duties options do you least prefer and why? | Do you have any further comments about duties? |
|------------------------|-------------|----------------|--|--|---|---|
| | | | | | | <p>passing you in a situation where lanes are about to merge.</p> <p>The length of the train, and the number of units in the train should be clearly marked on the rear and each unit of the train.</p> |
| 721 | 23/08/2020 | Rick | Driver | Legal ones. Ones that don't involve phone calls from the National transport office in the middle of the night to keep driving so they don't have to pay extra to get the truck unloaded | Ones that involve direction from managers and staff who do not consider what the driver needs to complete the allocated tasks legally and efficiently. | The Log book rules for counting time on page 21 of the National Driver work diary has allowed unscrupulous operators to exploit driving hours. |
| 723 | 27/08/20 | Peter Koutelis | Driver Training Solutions Australia Pty Ltd. | All | None | Not as yet |
| 731 | 22/10/20 | TREVOR WARNER | Employee Driver | <p>Option 4.1</p> <p>Duties of the Drivers is sufficiently provided for in other sections of the HVNL. Drivers generally have little control or influence over their schedules.</p> <p>Other CoR parties apply far more pressure on the Drivers, than Drivers place upon themselves.</p> | <p>Option 4.2</p> <p>Drivers are already are tasked with complying with so many other sections, yet have the least amount of control or influence over the freight task.</p> <p>Primary Duty is already provided for under sect 228(1). and associated sections relating to Speeding and Work/Rest options.</p> | <p>Placing the driver in the CoR has been tried in 2008 and has failed.</p> <p>Stakeholders have failed to adequately address Public Safety by attacking the driver. The Transport Operators continue to pass the buck on Fatigue instead of addressing the real cause of Driver Fatigue. Poor Scheduling, Poor sleeping Environment and Poor communications from management, are the 3</p> |

| Contribution ID | Date | Name | Organisation | Which duties options do you prefer and why? | Which duties options do you least prefer and why? | Do you have any further comments about duties? |
|------------------------|-------------|--------------|---------------------|--|--|--|
| | | | | | | <p>biggest issues.</p> <p>Drivers are the Employee's who keep management out of jail.</p> <p>Drivers are the Employee's who have to find a balance between poor management decisions and still control their stress levels in order to get quality sleep..</p> <p>The biggest impact to sleep is STRESS...this needs to be reduced, not increased by placing more burdens on the driver.</p> |
| 735 | 30/10/20 | David Leinen | | I support expanding the application of primary duties to parties who influence the safety of transport activities, as this was the original intention of CoR laws. | I strongly oppose expanding the application of primary duties to include drivers, as this would undermine the original legislative intention of CoR laws. The original intention of the CoR laws were to ensure parties with an influence over the transport activity are accountable for their influence. Adding drivers as a responsible party makes the primary duties provision redundant for all other influencing parties, as they will simply put all liability back on the driver by requiring them to sign CoR declarations. Drivers have the | |

| Contribution ID | Date | Name | Organisation | Which duties options do you prefer and why? | Which duties options do you least prefer and why? | Do you have any further comments about duties? |
|------------------------|-------------|------------------------------------|------------------------------------|--|---|---|
| | | | | | least control over the transport task - They are required to sleep when they are told to sleep and drive when they are told to drive. The parties who influence this need to remain accountable, not the drivers. | |
| 741 | 3/11/20 | Residential Traffic Safety Council | Residential Traffic Safety Council | | | COR is a joke on local Roads (council owned but not managed). You've got pilots and Guardian Traffic Management putting OSOM vehicles on roads without permits. You've got stop/go people allowing 40 tonne trucks on 5 tonne local roads without a care in the world that it's a severe mass breach. Council as a road manager. if complicit as is Lake Macquarie in NSW, has no accountability. The NHVR hotline won't do anything and State won't regulate on local roads so residents suffer. |
| 759 | 20/11/20 | Leah Stapleton | Qube Logistics | 4.1B Add specified parties to the defined list of parties in the CoR which defines all parties with influence on transport activities. Subject to a degree of influence. Given that that the HVNL COR is already exhaustive, and business (industry) is | 4.2 Apply the primary duty (s 26C) to drivers The impacts of this option are unable to be quantified. More information would be required before this option could be viable. Yet addition of both driver and maintenance provider | Concerns though, that the list could become too large and be determined unmanageable. We agree with the inclusion of the driver & maintenance provider. However, if we add specific other parties, COR becomes irrelevant as |

| Contribution ID | Date | Name | Organisation | Which duties options do you prefer and why? | Which duties options do you least prefer and why? | Do you have any further comments about duties? |
|------------------------|-------------|-------------|---------------------|---|---|--|
| | | | | constantly changing the additional parties could become irrelevant. Furthermore the COR structure is well established therefore further changes (parties) adds further cost burden in auditing or engaging potential influencers. | should be considered as an inclusion given direct impact in managing supply chain duties. | EVERYONE is included. This would cause confusion for parties on where their role falls within the chain. |

Fatigue – short form submissions received on HVNL review microsite

V2: 23/11/2020

| Contribution ID | Date | Name | Organisation | Which fatigue options do you prefer and why? | Which fatigue options do you least prefer and why? | Do you have any further comments about fatigue? |
|------------------------|-------------|-------------|---------------------|--|---|--|
| 712 | 20/08/2020 | Anonymous | | <p>When making changes to the fatigue regulations, please do not forget where the industry has come from. We don't want to return to the days where drivers were pushed to drive extreme hours to keep their livelihoods, trucks, income and in some cases, contracts. This put lives at risk and wrecked havoc on the health, sanity and the home lives of the truck drivers.</p> <p>Refer to the Brian Snewin accident which killed 6 people in 1996 article 'Coronial inquest reveals deadly conditions in Australian trucking industry' and some of the judges comments: The Coroner's report, handed down on March 17, revealed that:</p> <ul style="list-style-type: none"> • Stay-awake drugs are widely and frequently used by drivers battling to meet schedules • Drivers who fail to maintain schedules risk losing future work and thus their livelihoods • Driving while severely fatigued is common • The minimal regulations governing driving hours are often ignored <p>Employers may push drivers if they can. The current work diary system works and it protects drivers from manipulation. If the fatigue legislation is watered down to be more 'flexible and convenient' for those who complain, we may end up with more fatigue related accidents similar to recent incident with Connect Logistics.</p> | | |

| Contribution ID | Date | Name | Organisation | Which fatigue options do you prefer and why? | Which fatigue options do you least prefer and why? | Do you have any further comments about fatigue? |
|------------------------|-------------|-----------------|---------------------|---|--|--|
| 715 | 20/08/2020 | Michael Berrton | | 8.7 8.3a 8.3b 8.1 8.1a | 8.8 Too much responsibility on driver, as if matter goes to court the Company will be free of any negligence as the driver fully signed up alone. Both driver and owner need to sign so it is a shared decision. | I think over 50 hours one could place a fatigue education to reduce any safety factors than could happen. Making sure these drivers are educated in the "right to stop if fatigue issues arise." |
| 716 | 20/08/2020 | Ken Mansell | | Option 8.4 and - 8.3(a): Target requirements at high-risk category drivers Where there is a normal daily Work cycle within a business that has iso and OFSC accreditation there should be some exemption to a system intended for line haul Transport and high risk industries. | Option 8.8 Driver self-assessment Is my least preferred as self regulation may allow drivers with medical issues go undetected and money drives poor decision making processes | I believe there needs to be an option for utilities and workforces that drive to and from jobs in heavy vehicles and do their days work without driving long distances. |
| 719 | 21/08/2020 | kirk porter | KJP Haulage P/L | 8.1- simplifying the hours is a great idea. unfortunately a lot of drivers struggle with arithmetic. 8.7 - i have personally been resting for 2-3 hours but then feel tired within an hour of kicking off again. A driver needs to know that they can stop for another rest if needed without it costing him time out of his work day! | Our current system. Unfortunately it encourages drivers to drive when tired and forces them rest when they are refreshed. a classic being that they might do 13.5 hour day on Thursday. They've started work all week at 7am. after a good nights sleep on Thursday night they wake up early and decide to get going | I believe that we should be able to have a set of rules in place to discipline our drivers and make a note in the work dairies to show that they have had this action taken. If they are then inspected roadside by enforcement officials they can see what the drivers history has been like. If the official finds further breaches since his employer |

| | | | | | | |
|-----|----------|----------------|----------------|---|---|---|
| | | | | <p>8.8 - Each driver has a different set of circumstances on any given day. to think that we all feel the same level of fatigue is ridiculous. Only an individual can ascertain they level of fatigue.</p> | <p>early so they can knock off early. Off they go at 5:30am - they are now in breach of the 14 hr rule at 6am!!</p> | <p>has taken action the official can opt to take further action or give the driver a warning.</p> <p>At present the driver gets a non-conformance from us then loses his work diary so as not to get a find whilst out on the road. Your data is corrupted as you don't get to see the real statistics because there is no reporting mechanism between my company and you.</p> |
| 763 | 20/11/20 | Leah Stapleton | Qube Logistics | <p>8.1 provides for a simplification of work & rest requirements. The literacy & numerous issues that face the workforce sometimes causes inadvertent breaches that are unable to be calculated by a the median person within the industry. We agree that IVMS providers aid in real time monitoring of fatigue, however technology also struggles to calculate current rules that are complicated & ambiguous. IE Night rest break rules.</p> <p>Operator/ Driver confusion through the rule structure (rolling 24hrs etc) is the biggest concern & presently simplifying rules is imperative.</p> | <p>There are certain elements to each option that make sense from a safety, compliance & operational point of view, but there is no clear better option presented that would apply to all areas of our industry.</p> <p>Operators today review and assess fatigue through engagement. Simplifying rules, then supporting infrastructure (rest stops) & road conditions should be the primary purpose the HVNL review.</p> | <p>Night Rest Break requirements are not only over complicated, but assumes that there is 1 rule for a person's circadian rhythms . Should a driver that enjoys night shift, has completed night shift for 30 + years, sleeps better during the day & experiences a higher risk of fatigue if working dayshift, be penalised in available working hours for a rule that does not suit their body clock?</p> <p>Unless HVNL has all states & territories participating, the modification of fatigue legislation options provides little benefit yet further adds</p> |

Technology and data – short form submissions received on HVNL review microsite

V3: 23/11/2020

| Contribution ID | Date | Name | Organisation | Which technology and data options do you prefer and why? | Which technology and data options do you least prefer and why? | Do you have any further comments about technology and data? |
|------------------------|-------------|----------------|---------------------|---|---|---|
| 734 | 29/10/20 | Michael Holden | Bustle Technology | <p>All of them - They will allow carriers to genuinely make movements towards a more connect industry and away from paper.</p> <p>If we had to pick 1 - I'd say 6.2 as the first option because it would get carriers to start populating their data in to portals that ultimately lead to 6.1 and refining the data rulesets. All business supplying tech to carriers should be operating under government standards around personal information and data protection as part of their solution. Determining how to share that in a confidential and trusted way can see 6.2 flow to 6.1 and then 5.4</p> | None | <p>There are a mix of systems in Australia some of which don't understand the landscape or help the carriers especially the mum and dads (70% of Aussie truck supply).</p> <p>Allowing carriers to chose from a list of technology systems that are aligned to Australia's HVNL will ultimately help transport adopt systems that line them up with NHVR requirements without burden placed on the smaller businesses that cannot afford the same tech suites as the Tier 1's despite being a majority of the tier 1 supply.</p> <p>Taking this step will move the NHVR towards a more transparent, safer and connected industry that also provides Government with</p> |

| Contribution ID | Date | Name | Organisation | Which technology and data options do you prefer and why? | Which technology and data options do you least prefer and why? | Do you have any further comments about technology and data? |
|------------------------|-------------|------------------------------------|------------------------------------|--|--|--|
| | | | | | | non-sensitive data towards better planning of road and infrastructure. |
| 745 | 3/11/20 | Residential Traffic Safety Council | Residential Traffic Safety Council | <p>MetroCount traffic data</p> <p>Used worldwide. Australian. Affordable. Reliable. Every heavy vehicle counted on a road by axel and AustRoad class.</p> <p>This is what councils can use to find out where they need to actively manage heavy vehicle traffic on local roads. It takes away the 'we have no resources' excuse.</p> | 4 people going top to tail over one vehicle ignoring road surface and big picture. | Metro count is affordable. Many councils use it already. Most do not even know it counts and classes heavy vehicles. The software allows sharing between councils. It counts space between vehicles. It literally can predict where accidents are likely to happen. It can certainly be used to target enforcement resource allocation with precision. |
| 761 | 20/11/20 | Leah Stapleton | Qube Logistics | 6.2a Ability to carry and produce electronic documentation this reduces the paperwork burden on operators & the ability for the to provide paperwork to an operator while in transit to pick up, for example. | <p>6.2b - Documentation to be produced in a specified period. This option again presents unquantifiable impacts & introduces extra administrative reactive requirement.</p> <p>Its understandable to work towards a framework that supports standardisation. However, concerns are raised in regards to data & how this would relate to more cost for an operator (transactional charging from GPS providers).</p> | The requirement for IVMS to be a mandatory requirement would level the field & set a safety standard for any heavy vehicle industry participant. For example, someone who does not have IVMS Fatigue monitoring/EWD & additional fatigue risk control systems (fatigue detection systems) can provide lower transport costs as they do not incur the associated hardware & ongoing monitoring costs. |

| Contribution ID | Date | Name | Organisation | Which technology and data options do you prefer and why? | Which technology and data options do you least prefer and why? | Do you have any further comments about technology and data? |
|------------------------|-------------|-------------|---------------------|---|--|--|
| | | | | | Both small & large companies would need to absorb the additional costs as passing this on to consumers would be unachievable. Smaller entities within the industry (I.E - 1-5 trucks traveling short distances) trying to compete with larger corporations would be further disadvantaged. | Yet such businesses have business structures whereby high face to face engagement (risk reduction) with operators/ drivers is already in place therefore, IVMS is a cost burden to already reduced risk operations. Same risks different controls that produce similar outcomes. |

Vehicles – short form submissions received on HVNL review microsite

V3: 23/11/2020

| Contribution ID | Date | Name | Organisation | Which vehicles and roadworthiness options do you prefer and why? | Which vehicles and roadworthiness options do you least prefer and why? | Do you have any further comments about vehicles and roadworthiness? |
|------------------------|-------------|-------------|---------------------|---|--|--|
| 713 | 20/08/2020 | chet cline | air cti | <p>From all of my reading and attending the PBS review meeting in Sydney, the safety of PBS vehicles is being reduced by not specifying good tyres.</p> | <p>Where is our safety? Tyre pressures must be inflated to suit the load. 100 psi is potentially dangerous. Michelin has been saying this for decades.</p> <p>I have personally talked to and written numerous submissions on this subject to the NHVR.</p> <p>We are ignoring safety benefits, while running steer tyres 20% under inflated, drive tyres 33% to 300% over inflated, and trailer tyres 85% to 350% over inflated. This affects numerous safety problems, while increasing health damaging vibration to the driver, and costing our country and our world heaps in CO2, valuable resources, and wasted tyres.</p> | <p>The NHVR, the PBS system, and Aussie law, along with almost all transport companies ignore the tyre manufacturer's tyre pressure recommendations, which require the pressure to be adjusted to suit the load. John dePont, in his PBS tyre review recommended 120 psi steer, 75 psi tandem drive, and 55 psi tri axle pressures at our current legal load limit running 11R 22.5 tyres. This is a prime example of adjusting tyre pressures to suit the load, as is explained by Michelin, and in Load to Inflation tables everywhere. Our current happy go lucky system of putting 100 psi in all truck tyres is patently wrong. ARTSA proved that stopping distances of lightly loaded semi trailer rigs was 15% shorter when the tyres were inflated relative to the load.</p> |

| Contribution ID | Date | Name | Organisation | Which vehicles and roadworthiness options do you prefer and why? | Which vehicles and roadworthiness options do you least prefer and why? | Do you have any further comments about vehicles and roadworthiness? |
|------------------------|-------------|-----------------|---------------------|--|--|---|
| | | | | | | ARRB proved 15% less tyre slip angle. |
| 740 | 3/11/20 | Bastien Wallace | Bicycle NSW | We like the measures to help reduce fatigue, and under 10.3 that vehicles may receive faster approval if they have side underrun protection and blind-spot sensors, electronic stability control and anti-lock brakes. | We are disappointed to read that there doesn't appear to be a scheme to ensure all larger heavy vehicles have underrun protection and blind-spot sensors, electronic stability control and anti-lock brakes fitted. Road managers and operator managers currently allow unsafe routes and unsuitable vehicles on government contracts and sadly in NSW the death and injury of bike riders and pedestrians appears to be dismissed as 'the price of doing business.' No doubt drivers also suffer severe psychological impacts when someone is killed. This scheme fails to go far enough to promote and support the work and safety measures implemented by great operators. We recommend a recognition scheme for excellent practice, and promoting | This scheme needs to go further. Set a date within 1-2 years by which all vehicles need to be to take vehicles off the road if they don't have measures per 10.3 and appropriate safety training for operators. Advocate for financial support for small operators to get vehicles upgraded - bicycle and pedestrian organisations would be strong supporters. Make it much clearer that truck and trailer combinations routes, and rest areas need to avoid schools, parks and cycleways. Currently in NSW heavy vehicles use cycleways to park in, endangering bike riders. |

| Contribution ID | Date | Name | Organisation | Which vehicles and roadworthiness options do you prefer and why? | Which vehicles and roadworthiness options do you least prefer and why? | Do you have any further comments about vehicles and roadworthiness? |
|------------------------|-------------|------------------------------------|------------------------------------|---|---|--|
| | | | | | the safest companies and operators. | |
| 747 | 3/11/20 | Residential Traffic Safety Council | Residential Traffic Safety Council | | | RBIS needs to be transparent on the local road networks. Residents have a right to know what road managers are doing or not doing as to heavy vehicles in neighbourhoods. The secret nature of something that affects a neighbourhood and a community is not on. |
| 766 | 20/11/20 | Leah Stapleton | Qube Logistics | <p>10.1 (streamline PBS approval process), Manufacturer self-certify that the build is as per design; thus establishing a similar scheme to MRWA is imperative.</p> <p>Presently 1 assessment, other vehicles, assuming they are the identical spec as the ones inspected, can be signed off via the Manufacturers Declaration form.</p> <p>So assuming that the specs that was provided in the declaration form is identical to the approved, asset addition is granted.</p> | 10.2 More layers equals further delays. | The PBS progression / reform Australia wide has been driven by Operators and Manufacturers, hence these improvements have come about by industry, not regulation or government. PBS has improved both road safety and compliance, hence simplifying approval process is imperative. Yet it must be standardised Nationally. I.e NHVR PBS process vs WA PBS process |

| Contribution ID | Date | Name | Organisation | Which vehicles and roadworthiness options do you prefer and why? | Which vehicles and roadworthiness options do you least prefer and why? | Do you have any further comments about vehicles and roadworthiness? |
|------------------------|-------------|----------------|---------------------|---|---|--|
| 767 | 20/11/20 | Leah Stapleton | Qube Logistics | <p>Roadworthiness</p> <p>11.2 Risk-based inspection scheme. This would be a firmer/ stricter method of control & compliance by the regulator with specific profiles.</p> <p>This option would push for safer equipment on the road, with strict enforcement on identified risks.</p> <p>Roadworthiness standards are well established & standardised. Yet focus on high risk should be deemed above a balance line.</p> | <p>Roadworthiness</p> <p>11.1 State & territories vary in infrastructure. As such, this approach would see additional cost to industry.</p> | <p>Roadworthiness</p> <p>Unless all states & territories participate, the modification of Roadworthiness options provides little benefit.</p> <p>It should be considered at minimum they could also provide training packages for transport companies, (non-compulsory). If they are rolling out training packages for their in-house inspectors and road authorities. Can the industry have access to that also?</p> <p>There is the possibility of the exploitation of self-clearing defects, without actually performing the repair as there is no follow up inspection. Should there be an option such as, having defects listed in your accreditation portal? Where by self-clearing defects have a time period set against them. To be closed off, you must supply supporting information of said repair, etc.</p> |