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To Whom It May Concern

**Re: Submission on the Heavy Vehicle National Law (HVNL)**

Thank you for the opportunity to make a submission on the Heavy Vehicle National Law.

I believe the current law and enforcement is not working to protect people and to sufficiently reduce the heavy vehicle death and injury toll. Current HVNL is not uniformly applied or enforced, and it lacks a focus on outcomes-based safety measures. It appears to focus on efficiency at the expense of people.

I experienced many close calls with Truck and Dog assemblies on roads in Sydney, to the point where I gave up driving on the M4 during 2016, due to the excessive speed and erratic lane positioning of those vehicles.

The HVNL falls short of community expectations when it describes a safe and efficient heavy vehicle journey as comprising:

- a safe driver – one who is well-trained, competent, fit for duty and alert when driving
- a safe vehicle – one that is registered, roadworthy and safely loaded, and
- a suitable route – one that minimises public safety risks and excessive impacts on road infrastructure (given a heavy vehicle's mass and dimensions)

This should be altered to add:

- a safe systems approach that seeks to eliminate hazards through measures such as **removing B-Double, and Truck and Dog combinations from dense urban environments**, and reducing truck movements in urban environments and during peak periods.

And to amend

- a safe vehicle – one that is registered, roadworthy, safely loaded, includes best practice safety equipment such as side underrun protection, a high visibility cabin design or blind-spot sensors”

I believe the regulation should set a requirement that all heavy vehicle drivers complete the [Vulnerable Road User Awareness Training for Heavy Vehicle Drivers](#) or an equivalent course as part of maintaining their license.

I support the [Australian Trucking Association's call](#) for the formation of a National Road Safety Commission to investigate crashes involving trucks and to make recommendations

to change law, regulation, behaviour and technology to improve road safety. The HVNL should be amended to establish this Commission.

I believe these changes will help make Australian road users safer and align heavy vehicle regulation with global best practice standards.

Yours faithfully,  
Andrew Belford