

From: Fiona Campbell
Sent: Sunday, 28 April 2019 4:47 PM
To: NTC Enquiries <enquiries@ntc.gov.au>
Subject: Submission on the Heavy Vehicle National Law (HVNL)

Thank you for the chance to comment on the HVNL. I spent a number of years on the National Road Safety Strategy Panel and I believe more can be done for vulnerable road user safety, including in this sphere.

Current law and enforcement are not sufficient to protect people and to reduce the heavy vehicle death and injury toll. Current HVNL is not uniformly applied or enforced, it lacks a focus on outcomes-based safety measures.

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, 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

Driver training is a particular area for improvement. EU requirements for regular retraining has led to a good take-up in the UK, of cycle training for truck drivers, that enables them to gain better understanding, perspective and knowledge to help them drive safely around people riding bicycles.

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.

Please let me know if you would like more information about the UK truck driver cycle training program and any evaluation they have done, I'd be happy to follow up.

Yours sincerely

Fiona Campbell

(formerly the Vice President of the Bicycle Federation of Australia, and the BFA representative on the National Road Safety Strategy Panel)