

16 May 2019

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, it lacks a focus on outcomes-based safety measures. It appears to focus on efficiency at the expense of people.

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)

These points should be deleted and replaced by:

- a safety culture - where a driver is measured on safe trips, NOT the number of trips, or tonnage of goods transported (currently tonnage is the only measure by which many heavy vehicles drivers are measured and paid).
- 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
- 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 Sincerely



Lachlan Mackay