

April 30th, 2021

Heavy Vehicle Safety Strategy Project Team
National Heavy Vehicle Regulator
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Bicycle Queensland submission to the Heavy Vehicle Safety Strategy 2021-2025

BQ affirms all points from the proposed strategy with a few recommendations to represent the influence more clearly on improved safety for vulnerable road users and in particular, bicycle riders.

We wish to highlight and discuss the three agenda items. However, we do want to strongly affirm the partnership approach, sharing the responsibility of safety across all stakeholder groups. The focus on shifting to a more positive safety culture driven by shared data is encouraged and we look forward to seeing how individuals and organisations will be rewarded for their improved safety outcomes.

NHVR Agenda

1. Create positive change in behaviours and culture to improve safety.

NHVR priorities:

- 1.1 Support industry to manage human factors that contribute to heavy vehicle crashes, with a specific focus on fatigue.
- 1.2 Educate, inform, and empower operators and the supply chain to improve their organisational safety culture.
 - Support the uptake of safety management systems.
 - Address driver health (including mental health and acute health) and other human factors that play a role in heavy vehicle safety.
 - Enable Chain of Responsibility parties to successfully discharge their legislative safety duty obligations.
- 1.3 Undertake visible and consistent compliance activities.
 - Ensure the right person is held legally responsible for non-compliance with the Heavy Vehicle National Law (HVNL).
- 1.4 Improved road users' understanding of driving safely around heavy vehicles and promote road safety awareness initiatives about sharing the road.

BQ response to specific points of Agenda 1

- 1.1 BQ strongly affirms this aspect of the agenda. If the implementation of this strategy holds true to this principle, a happier, healthier culture will be developed to bring about safer outcomes for all involved.
- 1.2 BQ affirms this part of the agenda, especially in relationship to education. Our view is that by improving education the workplace will have an accountable organisational safety culture, this will allow individuals to professionally develop and take greater responsibility for improved safety culture, while also giving workplaces the opportunity to gain feedback into employees' level of understanding. Programs such as the Amy Gillett Sharing Roads Safely training program are an excellent example of this and can be tailored to suit organisational needs across Australia.
- 1.4 BQ would like to note that this section of agenda 1 may benefit from the inclusion of vulnerable road users (VRUs). While the improved knowledge of how to drive a light vehicle around heavy vehicles is critical to the safety of people in light vehicles, there is no explicit mention of pedestrians or bicycle riders in this section, of which make up a large proportion of the conflict represented in the statistics. Nor does this recognise the increasing number of people taking part in e-mobility across our major cities. BQ feel that to positively influence the behaviour of road users around heavy vehicles, it is essential to mention the vulnerable road user (VRU) group and the e-mobility group.

2. Drive uptake of a modern, safer heavy vehicle fleet that reduces the likelihood and impact of crashes.

NHVR priorities:

- 2.1 Enable industry to increase heavy vehicle safety technology uptake.
- 2.2 Support the uptake of newer, safer, more productive vehicles to reduce the average heavy vehicle fleet age.
- 2.3 Target operators that do not properly maintain heavy vehicle.

BQ response to specific points of Agenda 2

- 2.1 BQ affirms this part of the agenda. However, we feel that a mention of an improved minimum standard for older vehicles may present a clearer picture of how a reduction of road crash severity will occur. Inclusions such as retro fitted cameras and low-level passenger windows may present a cost-effective alternative to the current old vehicle safety standards.
- 2.2 BQ affirms this part of the agenda and would like to make mention of the logistics and refuse companies that are currently running the low entry cab-over vehicles reducing blind

spots. BQ feels that the inclusion of low cab-over vehicles, particularly in urban environments is a big improvement to safety for road users.

3. Influence road network design to support safe heavy vehicle use.

NHVR priorities:

- 3.1 Collaborate with decision-makers to help design and deliver infrastructure that is safe for heavy vehicles.
 - Provide information and advice to jurisdictions on heavy vehicle interactions with infrastructure to help inform future safety-related infrastructure decisions.
- 3.2 Partner with stakeholders to improve the number and quality of rest areas.
- 3.3 Work with road managers to assess infrastructure assets to support heavy vehicle safety Collaborate with decision-makers to help design and deliver infrastructure that is safe for heavy vehicles.

BQ response to specific points of Agenda 3:

- 3.1 BQ strongly affirms this item in the agenda. With strong partnerships the NHVR can stay in touch with the demands of a dynamic environment filled with a range of key stakeholders, including VRUs.

In summary

Bicycle Queensland is pleased to see the partnership approach to this strategy. BQ's review is reflective of an acute awareness that VRU are overrepresented in road crash statistics. We know the CLOCS national standard has been an instrumental in reducing fatal and serious crashes between heavy vehicles and VRUs by 47% in London. BQ is of the opinion that the adaptation of CLOCS to Australia (CLOCS-A) could play a larger role in this draft strategy.

We look forward to seeing the agenda carried out over the next five years.

Kind regards,



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