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**From:** Arnold G. McLean  
**Sent:** Tuesday, 13 April 2021 6:03 PM  
**To:** RRAT, Committee (SEN)  
**Cc:** Bird, Sharon (MP)  
**Subject:** NHVR Submission - Totally unsubstantiated statement

Committee Chair: Senator Glenn Sterle

Committee Secretary: Gerry McInally

Senate Standing Committee on Rural and Regional Affairs & Transport

Importance of a Viable, Safe, Sustainable and Efficient Road Transport Industry

I take this opportunity to make to your attention the inclusion of a totally unsubstantiated statement in the Submission by the NHVR ( Submission # 52) to your paramount Senate Standing Committee.

Notably on pages 6/7 Section 3. Promote productivity and certainty with an improved and modern access regime.

Increased adoption of safer and more productive vehicles.

2<sup>nd</sup> Paragraph commences ‘ *PBS vehicles have been found to improve productivity by an average of 15 to 30% and are involved in 46 percent fewer major crashes per kilometre travelled when compared with their conventional equivalent.*’

The NHVR provides absolutely no evidence to justify the declared claims.

Consider firstly vehicle productivity as experienced by HV operators . Notably vehicle productivity involves construct and preparation time and cost, licensing and route approval processing time, % utilisation (the majority of heavy vehicles operate at sub 50% utilisation), service, fuelling, maintenance (including tyre repairs / replacements) and repair down time, parts procurement, driver education, prime mover reliability, etc. etc..

Consider FORS 2000 (Sweatman, P.F. and McFarlane, S, (April 2000) Investigation into the Specification off Heavy Trucks and Consequent Effects on Trucks Dynamics and Drivers: Final Report , Report Prepared for FORS by Roaduser International Pty Ltd), Complainant Test Vehicles F3 and F26. Both operators were extremely fortunate to operate subject to forward and return fully laden haulage contracts with the vehicle unloaded and loaded at the respective same site. Why did these experienced long haul operators incur zero productivity. Simple they were forced to park their vehicles due to safety concerns. Likewise the operators of complainant vehicles F1, F4, F25, F26 (and F29) parked their vehicles.

The NHVR must be totally unaware that a parked HV attracts a productivity of zero. Hence there is absolutely no way a PBS vehicle can gain an 'as experienced by the operator' productivity improvement of on average 15 to 30%!

Secondly consider the statement '46 percent fewer major crashes per kilometre' . What a totally absolutely stupid statement! Notably the NHVR is involved with HV and notably heavy vehicles carry freight. Hence the only meaningful statistic for crash rate for HVs is the number of major crashes per kilo tonne kilometre or the number of major crashes per 1000 identical registered vehicles. Furthermore the declared numeral 46% is nothing less than a total farse or fabrication. From where did NHVR source their data for this claim. Notably the BITRE HV crash statistics do not distinguish between PBS and prescriptive (non PBS) articulated HVs. The NHVR must provide the VINs of the involved vehicles in their declared crash statistics.

Failing supply of evidence the NHVR must withdraw the statement from their submission.

Page 4 / 7 Last paragraph *'The HVNL should provide the overarching provision in the legislation to use technology to better regulate and improve safety and productivity outcomes. It should not mandate a particular type of technology that compromises market opportunities; rather it should be outcome focused.'*

This statement indirectly suggests the increased utilisation of autonomous vehicles. Such vehicles can be operated on totally controlled mine sites but not so on public roads. Notably if autonomous vehicles are to introduced the effectiveness of road side fencing must be invariably 100% at all times (including periods of high wind and rain) to kangaroos, wombats, wallabies, emus, deer, cats, dogs, dingos, cattle and steers, horses, sheep, goats, bullocks, camels, koalas, echidnas, humans, etc, etc.. One rarely hears of deer or any animal having impact with vehicles on Autobahns and US Highways. This particular concern is compounded by personal experience maintaining fences to keep a finite cattle herd secure.

I hope these matters are thoroughly appraised.

Yours faithfully

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