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The Committee Secretariat
Transport and Regional Services Committee
House of Representatives
Parliament House
Canberra ACT 2600

Emailed 27/10/03

Dear Committee Secretariat

**Response to the House of Representatives Transport and Regional Services Committee
Inquiry into the National Road Safety Strategy**

Please find attached ATA's submission to this inquiry.

We note that there will be a one-day public forum on Friday 28 November 2003 to discuss issues in relation to this inquiry. We would appreciate the opportunity to be presented at this forum.

Please feel free to contact me on (02) 6253 6933 or via rynned@truck.net.au if there are any queries in relation to this submission or attendance at the one-day public forum.

Yours sincerely

David Rynne
National Policy Manager, Safety & Environment



**AUSTRALIAN TRUCKING ASSOCIATION
RESPONSE TO THE HOUSE OF REPRESENTATIVES TRANSPORT AND
REGIONAL SERVICES COMMITTEE INQUIRY
INTO THE NATIONAL ROAD SAFETY STRATEGY**

OCTOBER 2003

1 BACKGROUND

The Australian Trucking Association (ATA) is the peak body of the Australian trucking industry. Its 16 member organisations include state and territory based trucking associations, sectoral trucking associations, national trucking companies and the Transport Workers Union.

It is estimated that the road transport industry contributes almost \$10 billion to Australia's GDP with approximately 500,000 persons involved in road freight transport.

Since its inception in 1999, the ATA, and previously as the Road Transport Forum (RTF) since 1989, has been heavily involved in a number of policy issues relating to the Australian trucking industry – notably: safety (including accreditation); taxation; environment; road funding; regulation; and technology and innovation.

2. INTRODUCTION

On 22 September 2003, the House of Representatives Transport and Regional Services Committee announced that it would conduct an inquiry into national road safety. This followed an earlier announcement by the Hon John Anderson MP to address the issue. Specifically, the Committee is seeking to identify why the national road trauma rate under the *National Road Safety Strategy 2001-2010* (NRSS) and the *National Road Safety Action Plan 2001-2004* (NRSAP) has 'plateaued'.

The ATA believes that in the main the strategic objectives, priority issues and proposed measures identified in the NRSS are sound and should continue to form the basis of Australia's road safety reform agenda. Further, there are a number of additional strategies that industry and government should pursue to reduce road trauma in relation to heavy vehicles.

Supporting views are discussed in detail under (1), (2) and (3) of the terms of reference below.

3. ISSUES

(1) Review the strategic objectives, priority issues and proposed measures in the NRSS (2001-2010), and the NRSAP (2001 and 2002 and 2003 and 2004) and consider whether these remain appropriate.

It should be noted that the Australian Transport Council and the Australian trucking industry has recently adopted the *National Heavy Vehicle Safety Strategy 2003-2010* (NHVSS) and *National Heavy Vehicle Action Plan¹ 2003-2005* (NHVAP).

The ATA had a substantial role in developing the NHVSS and NHVAP. As the heavy vehicle safety objectives (as co-developed by industry) identified in these documents are consistent with the strategic objectives of the NRSS and NRSAP² the ATA believes, from a heavy vehicle

¹ The NHVAP has eight core objectives, including: increased seat belt use by heavy vehicle drivers; safer roads; more effective speed management; reduced driver impairment; safer heavy vehicles; enhanced driver and industry management; effective enforcement; and targeted research and education.

² The four main objectives of the NRSAP are to improve road user behaviour; improve the safety of roads; improve vehicle compatibility and occupant protection; and use new technology to reduce human error.

safety perspective, that the strategic objectives of the NRSS and NRSAP are appropriate and should continue to form the basis of Australia's road transport safety reform agenda.

The ATA would stress that 'improving the safety of roads' and 'improving road user behaviour' are critically important objectives to the heavy vehicle sector. Similarly, and although much broader in context (i.e applicability), the priority areas and proposed measures identified in the NRSS and NRSAP are also complementary to the action items currently being implemented in the NHVAP.

The implementation of the NHVAP comes at a time when the trucking industry has achieved a period of considerable success in terms of improving its road safety performance. Recent statistics from the Australian Transport Safety Bureau (ATSB) (*Monograph 15 Articulated Truck Fatalities, May 2003*) indicate that despite an 18 per cent and 34 per cent increase in operating articulated trucks and total kilometres travelled respectively between 1991 and 2001, 'the fatality rate per kilometre travelled declined by about 20 per cent' during this period. The ATA is however not complacent and believes much more can be achieved.

The ATA would suggest that this progress is largely attributable to a number of key developments, namely:

- The success of industry led safety accreditation schemes such as TruckSafe³;
- The efforts of the ATA in cultivating a 'safety culture';
- Regulatory reform by the National Road Transport Commission (NRTC) that has promoted greater compliance and enforcement and operator flexibility in attaining operational standards;
- Technological developments in vehicles; and
- Infrastructure improvements.

(2) Identify any additional measures or approaches that could be or should be adopted by the Commonwealth, States and Territories, local government and non-government agencies and bodies (including industry) to reduce road trauma.

The ATA believes there are a number of additional measures that industry and government can take to improve road safety, including:

Industry

- Continue to work with the NRTC in finalising and implementing a reformed fatigue management approach. The ATA supports in principle the proposal of the NRTC to alter legal driving hours to better align the physical and mental capacities of drivers with work loads; reforms such as greater compliance and enforcement powers for enforcement bodies; and moves that place a duty on parties in the supply chain to manage fatigue and introduce chain of responsibility provisions for driving and rest hour offences;

³ TruckSafe Pty Ltd is a not for profit organisation responsible for the administration of the TruckSafe safety/business risk management accreditation program. At present, the voluntary program has 540 road transport company members with approximately 19500 accredited vehicles. Recent National Transport Insurance statistics indicate that TruckSafe operators experience 34% less accidents than non-accredited fleets.

- At present there are no mandatory or voluntary standards in relation to the installation and maintenance of speed limiters. In response, the ATA proposes to examine the merits of incorporating a maintenance and operating standard for speed limiters into the TruckSafe accreditation program;
- The ATA to investigate the merits of the TruckSafe program incorporating a standard that promotes the introduction of company drug policies with the objective of eradicating all substance abuse;
- Actively explore means by which intelligent speed adaptation systems can be adopted as a technological solution to the issue of speed control.

Government

- To accelerate and give emphasis to the strategic objectives, priority areas and proposed measures of the NRSS and the NHVSS. Those strategies that promote better speed enforcement, the usage of seatbelts and better vehicle design (i.e improved front under-run protection and cabin design for increased protection pending a review of heavy vehicle steer axle mass limits) are priority issues for the ATA;
- In relation to better speed enforcement, ATA calls on government to convene a heavy vehicle 'speed summit' as soon as practical to engender a greater acknowledgment and commitment from regulatory bodies to the problem, to address public concerns, and to canvass alternative approaches;
- To give clarification to which government body is monitoring, evaluating and reporting the progress of the NRSAP, and to explore whether it is necessary to benchmark and evaluate not only the overall performance of the action plan (i.e the reduction in road fatalities) but its implementation (i.e its specific objectives);
- To undertake a national review of truck rest areas with a view to introducing a funding approach similar to the current Black Spot program. Improved fatigue management policies (eg the introduction of chain of responsibility legislation and reformed driving hours) will not be fully effective if the infrastructure supporting it is not suitable. At present, there are not enough truck rest areas in Australia and they are poorly designed (for example, drivers can be easily 'boxed in' hampering access);
- Provide additional financial assistance to industry to: pursue technological developments such as Intelligent Transport Systems; engage in better safety training; promote general safety awareness; broaden the coverage of accreditation schemes such as TruckSafe to expand its range of products and business risk management solutions to suit the varying needs of industry;
- Increase the budget allocations of state government bodies responsible for safety compliance and enforcement. The ATA believes that there is a chronic shortage of enforcement resources, especially in regional areas of Australia;
- To move away from the current policy approach of favouring generic safety strategies. Sectoral specific safety strategies, such as the NHVAP, that take into account the unique characteristics of particular road users should be favoured;
- On the whole, the ATA would consider that the policy approaches identified in the *AusLink* green paper represent a sound platform to address the inevitable urban congestion, pollution, energy depletion and safety issues that will confront the transport industry over the ensuing period. As such, the ATA would impress upon government to expedite development of a white paper; and

- Further, the standard of infrastructure is a major contributory safety factor. In short, the higher the road standard the safer the road. Given forecast increases in freight volumes, infrastructure improvements must be accelerated.

(3) Identify factors that may be impeding progress in reducing road trauma, and suggest how these could be addressed.

As the NHVSS is a sub-set of the broader NRSAP, and the incidence of heavy vehicle related crashes and fatalities is significant, the ATA is eager to ensure that the safety concerns of the heavy vehicle sector continue to be incorporated into the broad national road safety debate, and not addressed purely from a NHVSAP perspective. For example, whilst the NRSS acknowledges that implementation of the NHVSS as a 'priority' (and hence, an action 'likely to have [a] substantial impact on the total number of road fatalities'), there is little reference to the heavy vehicle sector (or other road sectors, for example, cars and pedestrians) throughout the NRSS and NRSAP documents.

The ATA would request that in subsequent NRSS and NRSAP documents, that greater reference to the specific concerns of the heavy vehicle sector (and other sectors for that matter) is made. Doing so may ensure that the heavy vehicle safety agenda maintains its public profile as well as ensuring that bureaucracies responsible for road safety implementation do not develop policies (i.e generic road safety policies and 'unique' heavy vehicle safety strategies) in isolation.

Further, whilst it is recognised that the NRSS is a framework document that encourages the state and territory governments to tailor their own approach to safety policy, the ATA would argue that it is too generic. Whilst it is accepted that generic safety initiatives that have the potential to influence a wide range of road users (across road user sectors) are usually cost efficient, they are sometimes not totally effective. The development of the NHVSS was important because it gave recognition to the fact that the heavy vehicle sector has a number of unique characteristics – warranting a unique approach to safety reform. The ATA believes that this approach should be taken for other road users groups – such as vehicles and pedestrians.