

National Transport Commission  
Dr Gillian Miles - CEO  
Level 3, 600 Bourke Street Melbourne  
VIC 3000  
Phone: (03) 9236 5000  
Email: [enquiries@ntc.gov.au](mailto:enquiries@ntc.gov.au)  
[www.ntc.gov.au](http://www.ntc.gov.au)

Dear Dr Miles

**Re: Submission on the Heavy Vehicle National Law (HVNL)**

Thank you for the opportunity to make a submission on the Heavy Vehicle National Law on behalf of Bicycle NSW. We are a non-profit membership organisation serving as the peak advocacy body for people who ride bikes in NSW.

We 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)

This should be altered to add:

- a safe systems approach that seeks to
  - (a) eliminate incidents through measures such as removing B-Double, and Truck and Dog combinations from dense urban environments or reducing truck movements in urban environments and during peak periods,
  - (b) reduce incidents or the severity of injury if they occur through measures such as side front and rear underrun, requiring gap seals between cab and body or truck body and trailer, fitting blind-spot mirrors and sensors, left turning warning alarms and signage

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

We 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.

We 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.

Bicycle NSW believes these changes will help make Australian road users safer and align heavy vehicle regulation with global best practice standards. We also support calls for a federally funded scheme to assist smaller trucking companies in upgrading vehicles to meet this standard.

Yours Sincerely

*Bastien Wallace*

Bastien Wallace  
General Manger, Public Affairs