



# Response to the Inquiry into the Increase in Victoria's Road Toll

Submission on behalf of the  
**Victorian Transport Association**

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- 2.2.8 Adequacy and accuracy of road collision data collection – put and agreed to.

### **3.0 SUMMARY**

The Victorian Transport Association believes that all road deaths are preventable and that there is much more that can be done to improve upon current attitudes, actions and outcomes.

The following recommendations are provided as initial points of discussion and investigation and we welcome the opportunity to expand on these points.



## **1.0 ABOUT THE VICTORIAN TRANSPORT ASSOCIATION (VTA)**

### **1.1 Introduction**

The Victorian Transport Association (VTA) has over 800 members and is dedicated to the service of members and supporters in all sectors of the transport and logistics industry.

With over 100 years' experience and a specific business focus, we possess the industry acumen, market knowledge and industry contacts that enable members to capitalise on the current commercial and regulatory environments.

Recognised as Australia's pre-eminent multimodal prime contractor and employer organisation in transport and logistics, the association works with all levels of government, the unions, statutory authorities and the industry to achieve mutually beneficial outcomes. The VTA is committed to enhancing the image of the industry while helping improving the commercial environment for our members to operate.

## **2.0 VTA'S RESPONSE AND KEY RECOMMENDATIONS TO THIS INQUIRY**

The VTA has reviewed the 'Terms of Reference' for this Inquiry and proposes the following key recommendations for careful consideration by the Economy and Infrastructure Committee.

### **2.1 The VTA recommendations are as follows:**

**Recommendation 1** - To further investigate, with the intention of implementing, the use of technology to reduce the usage of smartphone technologies whilst driving.

**Recommendation 2** - Fatigue management be extended to all heavy vehicle drivers and that manual or electronic measurement regimes provide greater flexibility for the drivers to manage fatigue.

**Recommendation 3** - The Government introduce a change to the registration system that increases the cost of registration the older the vehicle becomes post 7 years of age.

**Recommendation 4** - The Principle Freight Network (PFN) needs to be delineated, implemented and improved to ensure that there are dedicated roads available at all times for freight vehicles to maintain specific routes.

**Recommendation 5** - The registering and training of any individual or body that has the responsibility to open a sealed road surface.

**Recommendation 6** - The extension of the current VicRoads road management programs and the hastening of these technologies to be implemented into greater areas of the road network.



**Recommendation 7** - Implementation of the current heavy vehicle licencing and assessment review recommendations to ensure heavy vehicle drivers are appropriately trained before obtaining a heavy vehicle licence.

**Recommendation 8** - Mandatory driver education course for year 12 students (but not younger).

**Recommendation 9** - Review and endorse change to Immigration Law and short-term visa holders licencing to ensure much stronger training requirements before being allowed to drive on Victorian roads.

**Recommendation 10** - The daily heavy vehicle crash data be reinstated by Victoria Police with specific funding provided.

**Recommendation 11** - Provide direct funding to industry groups which have capacity to drive messaging programs and recommend strategies.

**Recommendation 12** - Creation of a Transport Industry Safety Group (TISG) led by an independent body which is supported by government for specific and targeted outcomes to improve heavy vehicle safety.

## 2.2 Specific responses to Information Request

### **2.2.1 *Current Victorian Towards Zero Road Safety Strategy 2016-2020 and progress towards its aim of a 20 percent reduction in fatalities with 200 or less lives lost annually by 2020.***

The VTA is supportive of the rationale and the 'Safe System Approach' which underpins the *Victorian Towards Zero Road Safety Strategy 2016-2020*. We acknowledge that it is an ambitious strategy, evidence based and demonstrates a genuine commitment to drive change and make a difference.

The VTA believes that all road deaths are preventable.

The *Victorian Towards Zero Road Safety Strategy 2016-2020* is making a difference, however, the VTA believes that major challenges still remain and that the Strategy also needs to include a greater consideration and focus upon those issues relating to heavy vehicles.

### **2.2.2 *Adequacy and scope of the current driver drug and alcohol testing regime.***

The VTA has not provided comments in relation to this item.

### **2.2.3 *Adequacy of current speed enforcement measures and speed management policies.***

The VTA has not provided comments in relation to this item.



#### ***2.2.4 Adequacy of current response to smart phone use, including the use of technology to reduce the impact of smart phone use on driver distraction.***

Based on research and reports already conducted by the National Transport Commission (NTC) and the National Heavy Vehicle Regulator (NHVR), it is clear that significant advances and application of real time technology have a marked improvement in detecting the usage of smart phones while driving.

The improvements in safety monitoring has been expedient and these advances must be considered, mandated and implemented by Government. The VTA is not concerned about what technology is used as long as it is 'fit for purpose', approved and meets the regulatory standards requirements.

The VTA states that the heavy vehicle industry is well placed to quickly adopt these new technologies based upon the work yet to be done by the government and agencies.

Transport organisations want consistency, integration, interconnectivity, speed, accuracy and security at all levels of transmissions for their operations.

#### **Recommendation 1**

To further investigate with the intention of implementing the use of technology to reduce the usage of smartphone technologies whilst driving.

#### **Fatigue Management**

Although it is difficult to measure and monitor the many facets of fatigue while driving, there is a serious need to raise the awareness, understanding and knowledge of the dangers of driving while fatigued. The VTA is looking for the review of the HVNL to deliver a refined and more flexible regime that takes into consideration the ability of the Heavy Vehicle driver to better manage the issue of fatigue while driving.

The VTA is also looking for this review to enable greater responsibility to be enacted for short haul heavy vehicle driving and that all drivers of vehicles with a GVM greater than 4.5 tonnes be subject to the rules regarding fatigue management.

When it comes to fatigue management, the focus is very much on long distance operations not the high volume 'local' transport operations which 'represents at least 78 per cent of heavy vehicles' (NTC Issues Paper).

The VTA advocates that the legislative fatigue management requirements must extend to all drivers in vehicles greater than 4.5 tonne (GVM) on a national basis. It also maintains that the monitoring and managing of fatigue must be improved for those drivers operating within 100 kilometres of their base.

The VTA believes that fatigue management needs to be totally reworked whereby effective fatigue management is determined before an operator commences work. We must move from



the notion of simply monitoring and managing fatigue management through an administrative perspective as demonstrated in the current focus of work diaries.

### **Recommendation 2**

Fatigue management be extended to all heavy vehicle drivers and that manual or electronic measurement regimes provide greater flexibility for the drivers to manage fatigue.

#### ***2.3.5 Measures to improve the affordability of newer vehicles incorporating driver assist technologies.***

The Australian Design Rules (ADR's) along with the other related government policy makers already have a relatively high level of national consistency. The nature and the complexities involved in vehicle standards present their own challenges, however, the overall structure and regulatory oversight is in place.

The VTA advocates that we must explore all options and carefully consider the cost benefits, productivity and safety improvements for the transport and logistics industry.

The VTA strongly advocates that assessing and implementing advanced safety technology must also be high on the agenda in the total review of the HVNL and the 'Safe System Approach' being adopted in the *Victorian Towards Zero Road Safety Strategy 2016-2020*.

Currently, heavy vehicle manufacturers produce new products with the latest advances in vehicle safety technology. Much of this technology is not mandated and many operators will not entertain new equipment unless there are productivity improvements or market advantage.

The newer the vehicle the safer the vehicle and the more sustainable environmentally. It is imperative that the Government introduce a change to the registration system that increases the cost of registration the older the vehicle becomes. Based upon vehicle older than 7 years, this change would see commercial decision-making take in the elements of on-road safety and environmental sustainability.

### **Recommendation 3**

The Government introduce a change to the registration system that increases the cost of registration the older the vehicle becomes post 7 years of age.

#### ***2.3.6 Adequacy of current road standards and the road asset maintenance regime.***

While the current Government needs to be commended for the amount of investment and improvement that has been injected into the more than 22,000 kilometres of roads in Victoria there is much more that can be done. The better the condition of the road the safer the users of the road.

The establishment of Regional Roads Victoria has been a very positive move, however, there are still many roads both metropolitan and regional that are considered by the heavy vehicle industry as substandard and at times, depending on the vehicle, difficult to safely drive.



The VTA advocates that the road network needs to be further broadened, mapped and improved based upon usage of both passenger and freight vehicles. The Principle Freight Network (PFN) needs to be delineated, implemented and improved to ensure that there are dedicated roads available at all times for freight vehicles to maintain specific routes.

The VTA also advocates for greater accountability for those individuals and agencies that are empowered to open up and repair existing road infrastructure. This is to include the establishment of a gazetted repair and refurbishment program that would include the registering and training of any individual or body that has the responsibility to open a sealed road surface.

The VTA also advocates for greater investment in road management technologies that see improved connections and flow management. This includes the extension of the current VicRoads road management programs and the hastening of these technologies to be implemented into greater areas of the road network.

**Recommendation 4**

The Principle Freight Network (PFN) needs to be delineated, implemented and improved to ensure that there are dedicated roads available at all times for freight vehicles to maintain specific routes.

**Recommendation 5**

The registering and training of any individual or body that has the responsibility to open a sealed road surface.

**Recommendation 6**

The extension of the current VicRoads road management programs and the hastening of these technologies to be implemented into greater areas of the road network.

**2.3.7 Adequacy of driver training programs and related funding structures such as the L2P program.**

For many decades the road transport industry has suffered with a shortage of skilled and professional drivers. The road transport industry has not been seen as an industry of choice or as one that an individual will develop as a career.

This issue has meant that the road transport industry has not been accepted within stakeholder environments as an industry that can lead and determine its own development or direction. While many larger businesses have invested in improving this position individually and implemented bespoke driver improvement schemes, the root of the issue lies within the inadequacies of the current heavy vehicle driver licencing process.

There is no doubt that one of the reasons that the industry fails to attract and retain professional people is due to the levels of qualification and experience needed to start within the industry. At present, these levels are very low and there is little formal recognition of experience, knowledge and responsibility within a road transport company.



The current heavy vehicle driver licencing system does not ensure that the individual is competent, skilled and emotionally prepared to drive a heavy vehicle before they attain a licence.

Through Freight Victoria, Department of Transport, the VTA has been instrumental in achieving a review of the Victorian Heavy Vehicle Licencing system in Victoria. It will shortly produce competency based and skilled drivers that will be job ready and attractive to employers and deliver a secure workplace, acknowledging skill levels and knowledge, positive attitudes and safety all being key educational elements.

Given that heavy vehicle licensing services are consumed primarily by those wanting to work in the road transport industry, heavy vehicle licensing should also adequately prepare licensing applicants by ensuring that they receive comprehensive 'behind the wheel' (BTW) training in those driving environments that they are likely to be exposed to on a daily basis.

The review of the Heavy Vehicle Licencing System is a step forward for the road transport industry becoming more accountable to the community, more professional in itself and delivering safer outcomes for all road users.

The VTA also advocates for a mandatory course at high school for year 12 and VET students on the education and awareness of driving on our roads. Based upon short, one day, programs that are already available, these courses need to include heavy vehicle awareness and on-road characteristics.

Another major element of licencing a driver based on safety expectations is to ensure that short term visa holders are unable to attain a heavy vehicle endorsement without passing the heavy vehicle training regime that has been recommended by the VTA.

The current system of heavy vehicle endorsement for short term visa holders does not adequately provide the skills and awareness training and competency that is required to safely drive a heavy vehicle. Although imbedded in the Australian Immigration Act, this requirement needs a state-based focus and endorsement.

#### **Recommendation 7**

Implementation of the current heavy vehicle licencing and assessment review recommendations to ensure heavy vehicle drivers are appropriately trained before obtaining a heavy vehicle licence.

#### **Recommendation 8**

Mandatory driver education course for year 12 students (but not younger).

#### **Recommendation 9**

Review and endorse change to Immigration Law and short-term visa holders licencing to ensure much stronger training requirements before being allowed to drive on Victorian roads.



### **2.3.8 Adequacy and accuracy of road collision data collection – put and agreed to.**

Through the VTA initiated Transport Industry Safety Group, Victoria police used to collect and distribute daily accident details as accumulated by Victoria Police on the roads every day. This information gave specific data on vehicle size, sector ownership and initial observations by the officer attending.

This resource was shut down due to funding constraints five years ago.

This resource, while needing some refinement, needs to be re-established and provided to the heavy vehicle industry to ensure that specific areas and sectors can be targeted in education, enforcement and research.

#### **Recommendation 10**

The VTA recommends that the daily heavy vehicle crash data be reinstated by Victoria Police with specific funding provided.

#### **Funding Industry Support**

The value of industry associations is that they represent a variety of perspectives and intricate sectors within an industry and organise these entities into one voice. The heavy vehicle industry has many fragmented components and deal with a huge variety of issues that include: Chain of responsibility; fatigue management; people management and vehicle roadworthiness.

Industry Associations such as the Victorian Transport Association can deliver specific information and provide communication channels directly into individual companies.

An example of this was the formation of the Transport Industry Safety Group (TRIG). This group included the Coroner, Victoria Police, National Transport Commission, the Transport Workers Union and Worksafe and could also include Freight Victoria and the National Heavy Vehicle Regulator.

Focused on industry safety issues, this group accomplished many changes and improvements to operating standards that were implemented into transport companies directly. The VTA advocates that this group be re-established and charged with assisting the Government in delivering targeted and focussed improvement programs for the heavy vehicle industry.

#### **Recommendation 11**

Provide direct funding to industry groups which have capacity to drive messaging programs and recommend strategies.

#### **Recommendation 12**

Creation of a Transport Industry Safety Group (TISG) led by an independent body which is supported by government for specific and targeted outcomes to improve heavy vehicle safety.



## SUMMARY

The Victorian Transport Association believes that there needs to be a serious revision and challenge of current perspectives when addressing the concerns and issues of road safety. This requires a commitment and genuine focus on driving effective change that has specific and measurable safety outcomes.

It requires the 'political will', co-operation, collaboration and commitment of all key stakeholders to driving safety reform for Victoria. In particular, this will require challenging people's current attitudes and behaviours towards safety and safety programs. The VTA acknowledges driving the required reforms will be a challenge but it must be done if we are to achieve our goals.

To achieve the above, there must be practical and lasting methodologies that focusses on the identified specific issues.

The heavy vehicle industry is looking for the reforms that delivers improved safety, productivity and efficiencies when using public networks. It also expects that all road users are treated equally and that a 'scape-goat' attitude does not develop.

The reforms must also include a greater focus upon ensuring that all individuals accept their personal responsibilities as road-users.

We look forward to the outcomes of this review and thank the Minister for initiating this opportunity to provide a specific perspective.

Peter Anderson  
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**Victorian Transport Association**