



The Commercial Vehicle Industry Association of Australia

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Linda Rasmussen
Vehicle Safety Policy and Partnerships Branch
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
CANBERRA ACT 2601

Friday 2 July 2021

Dear Ms Rasmussen,

I write to you on behalf of the Commercial Vehicle Industry Association Australia (CVIAA), the national, peak industry association representing suppliers of parts, services, repairs and modifications to the Australian heavy vehicle industry. CVIAA is active in five states and has approximately 1,300 members.

As national president of CVIAA, I would like to thank the Department of Infrastructure, Transport, Regional Development and Communications (the Department) for the opportunity to provide feedback on the Department's Safer Freight Vehicle discussion paper.

Having consulted extensively with our national membership, CVIAA publicly supports the adoption of **Option 2a– Increase the width limit to 2.6m for goods vehicles and trailers over 4.5 tonnes**. It is our view this option will provide industry with the greatest flexibility to design, enhance, import and export a range of products, to and from, a range of markets. It is worth noting, however, that some heavy vehicle trailer manufacturers and importers supplying vehicles for Performance Based Standard (PBS) application may not opt for the additional width trailers due to an increase in the cost of production and maintenance. Conversely, some manufacturers will opt for the increase to take advantage of the space for mounted plant, low loaders and specialised equipment.

Whilst CVIAA supports the extension of vehicle and trailer width, we express some concerns regarding the proposed new mandatory safety systems required to achieve the additional width for heavy vehicle trailers – for example devices for side underrun protection ADR 106/00 and reversing lamps ADR 13/00.

In their latest report, the National Truck Accident Research Centre¹ found multi-vehicle crashes involving heavy vehicles have reduced by more than 16 per cent. CVIAA acknowledges that vehicle technology and regulation have likely contributed to this

¹ National Truck Accident Research Centre (2013). 2013 Major Accident Investigation Report.
<https://www.nrspp.org.au/resources/2013-major-accident-investigation-report/#resource-downloads>.



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reduction, however, we need to be confident that regulators are not imposing additional, new safety requirements that do not necessarily add to the overall safety of the fleet.

Instead, excessive regulation adds costs to the industry, affecting all aspects of the heavy vehicle supply chain.

Side underrun protection

It is CVIAA's view that the mandatory fitment of side underrun protection on heavy vehicle trailers above 2.5m will add additional cost to production and vehicle maintenance. Side underrun protection is also likely to complicate the design of side tippers, chassis tippers, gas tankers and other heavy vehicle trailers that are predominantly used in regional areas. Adding this safety system will likely provide little, to no benefit, to pedestrians, cyclist or motor cyclist as they would not regularly interact with additional width heavy vehicle trailers in the areas of most frequent use. The side underrun protection device is somewhat weak in its design and construction and can be easily damaged when the vehicle is used on unsealed roads – which is commonplace in regional and remote parts of Australia. The risk of this safety system being damaged or dislodged during operation is an issue.

Further, CVIAA recommends an exemption for vehicles designed for PBS applications, allowing these vehicles to not be fitted with side underrun protection, noting that PBS vehicles operate on approved networks and are less likely to interact with pedestrians, cyclist or motorcycles at intersections when turning. This exemption could be closely monitored and should an incident or near miss occur on a PBS approved combination, the exemption could be discontinued.

Fitment of reverse lamps

The mandatory fitment of reverse lamps to additional width heavy vehicle trailers is also considered to be of questionable value due to the length of the vehicle combinations (for example, B Doubles).

Whilst it could be argued that one trailer could benefit from reverse lamps, multi-combination vehicles, all fitted with reverse lights, could cause unintended problems. Multiple white lights, when illuminated, could distract and confuse oncoming traffic and may even cause an incident. An increase in production and maintenance cost would also be expected.

In its recent technical guide² on audible reverse warning devices, the Truck Industry Council reported several manufacturers are already supplying their vehicle to market with these

² Truck Industry Council (2019). *Audible Reverse Warning Devices Technical Guide*. https://assets.website-files.com/5cbe46bce3c2320cf45d2b62/5d7844e221b0b20d9aa757be_Audible%20Reverse%20Warning%20Devices%20Technical%20Guide%20July%202019.pdf



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devices fitted. CVIAA makes the case that it may not be necessary to fit trailers with an audible reverse warning device due to the expectation that the truck, or prime mover, would provide ample alarm. It is further argued that industry could also be educated of safe reversing practices, including the operation of hazard lights when reversing – a common practice already used by many operators.

CVIAA is not convinced there is adequate evidence of recorded heavy vehicle incidents having been avoided by the use of reverse lights fitted to trailers. We would, however, be interested in any evidence the government has that demonstrates improved safety outcomes based on the fitment of reverse lamps. At the very least, CVIAA would request a Regulatory Impact Statement that addresses the pros and cons of implementing such regulation.

In closing, CVIAA reiterates industry has long supported an increase to the allowable width of heavy vehicles however, there are questions regarding the validity of the proposed mandatory inclusion of the above-mentioned safety systems on heavy vehicle trailers.

CVIAA maintains our willingness to work with the Department as you consider the proposed options. Should you like to discuss this submission further, please do not hesitate to contact the CVIAA secretariat: Dr Imogen Reid, ireid@vacc.com.au 0428 334 128 at your convenience.

Yours sincerely,

Phill Hodges
National President CVIAA