



**Commercial Vehicle Industry of Australia's (CVIAA)
response to the
draft Heavy Vehicle Safety Strategy
consultation document**

April 2021



Contact:

Dr Imogen Reid
CVIAA Secretariat
Level 7, 464 St Kilda Road,
Melbourne, VIC
ireid@vacc.com.au
0428 334 128



Table of Contents

1	Introduction	4
2	The importance of culture change.....	4
3	Fatigue risk management.....	4
4	Costs to industry	5
5	Vehicle inspections and roadworthiness	5
6	Mental Health	6
7	Conclusion.....	6



1 Introduction

The Commercial Vehicle Industry Association of Australia (CVIAA) is a national peak industry association that represents 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.

CVIAA is the co-ordinating body for the Motor Trades Association (MTA) in South Australia (SA), New South Wales (NSW), Western Australia (WA) and the Tasmanian Automotive Chamber of Commerce (TACC) in Tasmania and the Commercial Vehicle Industry Association of Victoria.

CVIAA is pleased to make the following submission to the National Heavy Vehicle Regulator (NHVR) relating to the draft Heavy Vehicle Safety Strategy.

The following submission is based on member feedback provided by CVIAA members. It responds to the three key agenda points outlined in the draft strategy:

- create positive change in individual behaviours and culture to improve safety
- drive uptake of a modern, safer heavy vehicle fleet that reduces the likelihood and impact of crashes
- influence road network design to support safe heavy vehicle use.

CVIAA strongly supports a national approach to road transport and related road safety.

2 The importance of culture change

Changing the culture of an industry or individual is a difficult and complex undertaking. Long held beliefs and habits perpetuate specific behaviour, often exacerbated by tight deadlines, regulation and competition.

CVIAA supports the NHVR's ambition to improve individual behaviours and the culture of the industry more broadly, but caution this will take significant time and will require a wholistic approach including regulatory reform, and education for both drivers and the general public.

3 Fatigue risk management

Fatigue risk management is critical to safety and should not be compromised. However, overly prescriptive fatigue management can have perverse effects, compelling drivers to make riskier decisions to comply with the rules.

For example, a driver transporting furniture nearing the end of their maximum hours period is able to stop on the side of the road to commence a rest period. However, a coach driver, transporting people on a tour, is unable to stop 'anywhere' at a prescribed time, especially if thirty minutes down the road there are suitable rest stop facilities.



CVIAA members maintain the position that fatigue risk management is best managed by business owners, based on risk profile, rather than the enforcement of strict and often punitive regulation.

CVIAA argues a flexible, safety-first, approach (as applied in South Australia) is the sensible way to manage fatigue in the industry. This is in recognition of the diversity of freight types and tasks dealt with by operators.

4 Costs to industry

CVIAA understands that modern heavy vehicles are equipped with sophisticated safety technology unavailable in older fleets. CVIAA makes the point, however, that the cost of incorporating newer vehicles into operators' fleets is often cost prohibitive.

Slim profit margins and increasing business costs impact an operator's ability to invest in state-of-the-art technology. Safety mechanisms that are beyond required legislated compliance levels are often seen by many as unnecessary and potentially risking their business viability.

Limited understanding of the benefits of safety technology is also identified as a reason for lower uptake of the technology. The perceived increased in maintenance requirements of vehicles with more technology, and the difficulties with maintaining those vehicles in rural and regional areas is also an explanation for low uptake.

Consideration must also be given for owners of vintage, veteran and VASS approved modified trucks that operate on our roads. These vehicles provide creativity, personal expression and interest to their owners and the broader community. Members' experience is that such vehicles are often fastidiously maintained due to a genuine care and pride by the owner. CVIAA makes the point that owners of older vehicles should not be penalised, nor forced to incur the financial burden of purchasing a newer vehicle based on the assumption their fleet is not safe simply due to its age.

5 Vehicle inspections and roadworthiness

Members from states where the NHVR controls the vehicle inspection process on highways, have serious concerns regarding NHVR inspectors' mechanical qualifications and experience. This also applies to police inspectors.

CVIAA members have observed inspectors targeting major safety areas such as brakes, steering, suspensions and tyres, without the proper mechanical or regulatory understanding. Members have cited examples where they have been defected for misting shock absorbers, despite the manufacturer of the component clearly stating misting as acceptable.



Whilst it may not be practical for every inspector to be a fully qualified heavy vehicle mechanic, at a minimum, inspectors should have access to experienced and qualified staff to seek clarification or defer decision-making where appropriate.

CVIAA would also be happy to work with the NHVR to develop an introduction to vehicle safety inspections and provide a certificate that demonstrates the inspector has passed a basic vehicle inspection course. The Motor Trades Association South Australia (MTA SA) is well placed to provide this training as they are a registered training organisation and have sophisticated training infrastructure already in place.

Further, establishing a national heavy vehicle inspection framework, which identifies and targets operators inadequately maintaining their heavy vehicle fleet, is seen as a positive move. Clearly understood roadworthy inspection requirements, which are consistently applied, regardless of the location and authority, are critical for industry to be able to operate with confidence.

6 Mental Health

Mental health is a concern to all sectors and organisations within the transport industry. CVIAA and its state-based members fully support all efforts undertaken by NHVR to address mental wellbeing of those who employ and are employed within the industry.

7 Conclusion

CVIAA supports the undertaking of a Heavy Vehicle Safety Strategy, but maintains additional regulatory burdens that add excessive cost and energy to ensure compliance, should be avoided. CVIAA and its secretariate would welcome the opportunity to work closely with the NHVR as it develops the details of the strategy.