

Vehicles – short form submissions received on HVNL review microsite

V3: 23/11/2020

Contribution ID	Date	Name	Organisation	Which vehicles and roadworthiness options do you prefer and why?	Which vehicles and roadworthiness options do you least prefer and why?	Do you have any further comments about vehicles and roadworthiness?
713	20/08/2020	chet cline	air cti	<p>From all of my reading and attending the PBS review meeting in Sydney, the safety of PBS vehicles is being reduced by not specifying good tyres.</p>	<p>Where is our safety? Tyre pressures must be inflated to suit the load. 100 psi is potentially dangerous. Michelin has been saying this for decades.</p> <p>I have personally talked to and written numerous submissions on this subject to the NHVR.</p> <p>We are ignoring safety benefits, while running steer tyres 20% under inflated, drive tyres 33% to 300% over inflated, and trailer tyres 85% to 350% over inflated. This affects numerous safety problems, while increasing health damaging vibration to the driver, and costing our country and our world heaps in CO2, valuable resources, and wasted tyres.</p>	<p>The NHVR, the PBS system, and Aussie law, along with almost all transport companies ignore the tyre manufacturer's tyre pressure recommendations, which require the pressure to be adjusted to suit the load. John dePont, in his PBS tyre review recommended 120 psi steer, 75 psi tandem drive, and 55 psi tri axle pressures at our current legal load limit running 11R 22.5 tyres. This is a prime example of adjusting tyre pressures to suit the load, as is explained by Michelin, and in Load to Inflation tables everywhere. Our current happy go lucky system of putting 100 psi in all truck tyres is patently wrong. ARTSA proved that stopping distances of lightly loaded semi trailer rigs was 15% shorter when the tyres were inflated relative to the load.</p>

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						ARRB proved 15% less tyre slip angle.
740	3/11/20	Bastien Wallace	Bicycle NSW	We like the measures to help reduce fatigue, and under 10.3 that vehicles may receive faster approval if they have side underrun protection and blind-spot sensors, electronic stability control and anti-lock brakes.	We are disappointed to read that there doesn't appear to be a scheme to ensure all larger heavy vehicles have underrun protection and blind-spot sensors, electronic stability control and anti-lock brakes fitted. Road managers and operator managers currently allow unsafe routes and unsuitable vehicles on government contracts and sadly in NSW the death and injury of bike riders and pedestrians appears to be dismissed as 'the price of doing business.' No doubt drivers also suffer severe psychological impacts when someone is killed. This scheme fails to go far enough to promote and support the work and safety measures implemented by great operators. We recommend a recognition scheme for excellent practice, and promoting	This scheme needs to go further. Set a date within 1-2 years by which all vehicles need to be to take vehicles off the road if they don't have measures per 10.3 and appropriate safety training for operators. Advocate for financial support for small operators to get vehicles upgraded - bicycle and pedestrian organisations would be strong supporters. Make it much clearer that truck and trailer combinations routes, and rest areas need to avoid schools, parks and cycleways. Currently in NSW heavy vehicles use cycleways to park in, endangering bike riders.

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					the safest companies and operators.	
747	3/11/20	Residential Traffic Safety Council	Residential Traffic Safety Council			RBIS needs to be transparent on the local road networks. Residents have a right to know what road managers are doing or not doing as to heavy vehicles in neighbourhoods. The secret nature of something that affects a neighbourhood and a community is not on.
766	20/11/20	Leah Stapleton	Qube Logistics	<p>10.1 (streamline PBS approval process), Manufacturer self-certify that the build is as per design; thus establishing a similar scheme to MRWA is imperative.</p> <p>Presently 1 assessment, other vehicles, assuming they are the identical spec as the ones inspected, can be signed off via the Manufacturers Declaration form.</p> <p>So assuming that the specs that was provided in the declaration form is identical to the approved, asset addition is granted.</p>	10.2 More layers equals further delays.	The PBS progression / reform Australia wide has been driven by Operators and Manufacturers, hence these improvements have come about by industry, not regulation or government. PBS has improved both road safety and compliance, hence simplifying approval process is imperative. Yet it must be standardised Nationally. I.e NHVR PBS process vs WA PBS process

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767	20/11/20	Leah Stapleton	Qube Logistics	<p>Roadworthiness</p> <p>11.2 Risk-based inspection scheme. This would be a firmer/ stricter method of control & compliance by the regulator with specific profiles.</p> <p>This option would push for safer equipment on the road, with strict enforcement on identified risks.</p> <p>Roadworthiness standards are well established & standardised. Yet focus on high risk should be deemed above a balance line.</p>	<p>Roadworthiness</p> <p>11.1 State & territories vary in infrastructure. As such, this approach would see additional cost to industry.</p>	<p>Roadworthiness</p> <p>Unless all states & territories participate, the modification of Roadworthiness options provides little benefit.</p> <p>It should be considered at minimum they could also provide training packages for transport companies, (non-compulsory). If they are rolling out training packages for their in-house inspectors and road authorities. Can the industry have access to that also?</p> <p>There is the possibility of the exploitation of self-clearing defects, without actually performing the repair as there is no follow up inspection. Should there be an option such as, having defects listed in your accreditation portal? Where by self-clearing defects have a time period set against them. To be closed off, you must supply supporting information of said repair, etc.</p>