



18 February, 2011

Dr Alan Tesch
Chair, Safety Standing Sub-Committee
SCOT (Transport Chief Executives)

Via email: roadsafetystrategy@infrastructure.gov.au

Cc: Mr Tony McMullan, Truck Industry Council

Dear Dr Tesch,

Subject: TIC Feedback to draft National Road Safety Strategy 2011-2020

The Truck Industry Council (TIC) is the peak industry body representing manufacturers and distributors of heavy commercial vehicles (that is, with Gross Vehicle Mass above 3,500 kg) in Australia.

TIC member companies supply heavy commercial vehicles to the Australian market today that contain standard safety features that actively work to reduce crashes, and also have many passive safety features that reduce injuries to both the occupants of the vehicle and other vehicles that may be involved.

TIC welcomes the draft National Road Safety Strategy 2011-2020 document, and also Council's ability to provide feedback to the documents development.

The Australian Truck Fleet

A major concern in Australia is the fact that the average age of the national truck fleet is more than 14 years. If we examine comparable data from Europe, the USA and Japan, we can see that these countries enjoy fleets with average age of about eight years or less.

That means in Australia we have to wait almost twice as long to enjoy the improved safety and environmental benefits brought to the roads through new safety features and low emissions technologies. While this submission will address some specific issues raised in Item 9 of the

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Safety Strategy paper, the over-arching point that must be reinforced is that the road toll and crash-related injury rate can be reduced substantially if constructive measures are adopted by governments at all levels to renew the truck fleet at a faster pace.

The TIC supports initiatives that will improve safety on Australia's roads, and believe that its members' latest products can make a very positive contribution towards the draft National Road Safety Strategy for 2011-2020 achieving its stated goals.

The section of the document to which TIC can make the most valid contribution is Part 9: Safe Vehicles. For obvious reasons, TIC comments are limited to those parts of the draft strategy which refer to heavy vehicles.

Specific Comments

1. **Infrastructure communication and ITS. (8th & 9th bullet point, page 38).** TIC accepts that multi-level / purpose communications between vehicles and between vehicles and infrastructure are being developed and implemented quickly in overseas markets. The number of systems under development amongst aftermarket system suppliers, truck manufacturers and infrastructure owners is substantial. Indeed, some such systems have been rolled out for heavy vehicles in Australia (such as the Intelligent Access Program). The key to successfully adopting systems that will work in Australia is to ensure that internationally accepted standards are employed locally. Therefore, TIC applauds the reservation of the 5.9 GHz frequency in Australia, consistent with most overseas markets. However, consideration must also be given to the slightly lower frequency range used in Japan for such systems, being 5.77 to 5.85 GHz. Currently, around 60% of trucks sold in Australia are of Japanese origin, and this figure is above 75% for medium duty rigid trucks. Therefore, consideration of this frequency within the range allocated for ITS is critical. Any guidelines for ITS must ensure that systems developed by overseas vehicle manufacturers will operate seamlessly in local conditions.
2. **National Heavy Vehicle Braking Strategy. (2nd bullet point, page 39).** The NRSS makes specific mention of the 2008 braking strategy. Almost three years on, very little has changed in the development of Australia's brake regulations. Anti-Lock Braking systems (ABS) can now be found as standard equipment on the majority of heavy commercial vehicles, yet they are not required to be fitted through Australian Design Rules, with the exception of B-Double rated prime movers. TIC supports mandatory ABS for heavy vehicles, in principle, as well as careful consideration to the adoption of mandatory Electronic Braking System (EBS) on heavy towing vehicles such as prime movers. The risk to overall safety levels is that new entrants to the Australian market could introduce low cost trucks without the features (such as ABS and EBS) that have become standard on most offerings from established manufacturers. Development of ADRs in the heavy vehicle segment (specifically ADR 35 and 38) needs to be accelerated, as the regulations are falling significantly behind the commonly available technologies. These comments also apply to point 19 on page 40.
3. **Average Fleet Age. (3rd bullet point, Directions, page 39).** As previously mentioned, the national heavy vehicle fleet age is around 14 years (source: ABS 9309.0 March 2010 Census), significantly higher than for light vehicles. This figure has not changed appreciably for about ten years. Consequently, the benefits that can be achieved through newer vehicles with

advanced safety and low emissions technologies are not being realised in a timely fashion, compared with most other developed markets. TIC strongly supports any initiatives which actively encourage the adoption rates of new and late model heavy vehicles while removing old, relatively unsafe and higher polluting vehicles from our roads.

4. **Improvements to the ADR process. (Item 18, page 39).** While TIC supports improvements to the ADR change process, especially in regards to heavy vehicle braking systems, ***caution is warranted*** when considering “automatic acceptance” of all UNECE regulations. There are many unique heavy vehicle configurations and combinations used in Australia that do not behave in the same way as vehicles overseas. Therefore, assessment of any relevant UNECE to its applicability in local conditions is warranted prior to “automatic acceptance”. A good example would be any attempt to automatically accept stability control systems on heavy prime movers from overseas, which are then used in B-Double and road train operations that are outside of the scope of the system’s original design and calibration.
5. **Heavy Vehicle Cabin Strength. (Item 20, page 40).** While TIC supports gradual improvement in both passive and active safety standards for all vehicles, regulators must be made aware that product life cycles for heavy vehicle cabins is many times longer than for the average light vehicle. For example, most cars are completely redesigned or substantially restyled (with the opportunity to change crash structures etc.) every 4 to 8 years. For light commercials, this may be 10 years, while for heavy commercial vehicles, this period is anywhere from 12 to 30 years or more. The expense of designing a new truck cabin is so high that it must be amortised and recovered over a much longer period than for a car, which is typically produced in much higher volumes. Having said that, the ECE R29 standard for cabin strength has existed for over 20 years. Most trucks sold in Australia currently comply with at least one of the versions of this ECE standard. Caution must be exercised, however when drafting any new ADR requirement, as there may be more than one version of the standard, and the latest version may not be that which should be used at the exclusion of the others.
6. **Industry Codes of Practice. (Item 24, Page 40)** TIC members and other industry bodies have been actively involved in Codes of Practice, especially when a need is observed that will enhance the overall safety of the Australian vehicle fleet. A good example is the Heavy Vehicle Combination Braking Code of Practice, under development at present. This is a case of regulatory inaction (through lack of changes to ADRs 35 and 38) leading to industry taking the lead to improve safety levels. ***Given the choice, industry (including TIC members) prefers to have “black and white” regulations and design rules rather than Codes of Practice.*** The legal authority of a Code of Practice is still untested in many scenarios, while the authority of ADRs and their standing in the *Motor Vehicle Standards Act 1989* is unquestioned. Further, Codes of Practice are not mandatory, so will not allow enforcement agencies to rule out potentially unsafe combinations.
7. **Incentives to promote greater turnover of the fleet. (Item 25, Page 40)** TIC strongly supports the introduction of such incentives, as they will accelerate the uptake of advanced safety features that are available in the latest vehicles. Tax-based incentives, such as the 2009 investment allowance, have been shown to be effective. In overseas markets, incentives for operators to adopt the latest emissions standards ahead of the mandatory regulation introduction date have also been tremendously successful. These have taken the

form of lower registration charges, providing a substantial incentive the vehicle buyers that will partially offset the increased capital cost of purchasing new vehicles. A further type of incentive could be to offer payload increases (through increased axle mass limits) for vehicles fitted with advanced safety and environmental features. An example of this was the additional 0.5 tonne steer axle mass limits permitted in 2005 on heavy trucks that adopted clean engines that complied with ADR80/02 or later, plus a certified front-under-run protection system and ECE R29 cabin strength compliance.

- 8. Post-Production Modifications. (Item 27, Page 40)** TIC members strongly support measures which tighten the regulations covering aftermarket modifications, especially where factory-designed and fitted safety features may be compromised. TIC member companies go to great lengths and expense to develop “approved” accessories such as bull bars that are tested to maintain the integrity of the original vehicle’s ADR compliance, and to maintain the correct functionality of devices such as airbags and crumple zones.
- 9. Future Steps.** TIC fully supports efforts to improve overall safety of the Australian vehicle fleet. To that end, advanced emergency braking systems for heavy vehicles must be considered, but must first be subject to a thorough RIS to ensure their adoption in heavier, uniquely-Australian combinations can be achieved. In the same way, the adoption of telematics as a vehicle regulatory tool and road damage minimisation tool is a fine objective, however the systems may not be easily adopted from overseas markets without governments first committing to a substantial level of infrastructure expenditure.

I trust that you and your fellow SCOT members find this feedback constructive, and a useful basis for further discussion. The strong relationship and open dialogue between transport departments at both federal and state level, and TIC is appreciated and I trust that it will continue.

Please contact the undersigned, on 0427 554 775 or shumphries@truck-industry-council.org for any questions about this position.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Humphries', is enclosed within a thin black rectangular border.

Simon Humphries
Chief Technical Officer