

30 April 2021

Attention: Heavy Vehicle Safety Strategy Project Team  
National Heavy Vehicle Regulator  
PO Box 492  
Fortitude Valley QLD 4006

Lodged via email: [safety@nhvr.gov.au](mailto:safety@nhvr.gov.au)

### **AGF Submission: Response to the draft *Heavy Vehicle Safety Strategy 2021-2025***

---

The Amy Gillett Foundation (AGF) welcomes the opportunity to provide feedback on the draft *Heavy Vehicle Safety Strategy 2021-2025* (the strategy). The AGF is a national organisation with a mission to reduce the incidence of serious injury and death of cyclists in Australia. We draw on evidence and international best practice, and collaborate with governments, business and the community, to create a safe environment for cyclists, while maintaining an efficient road network for all road users. The AGF has a direct interest in contributing to the conversation about heavy vehicles, as safe practices within the heavy vehicle industry are critical to the safety of cyclists and other vulnerable road users (VRUs), namely motorcyclists and pedestrians.

The primary intent of this submission is to highlight the need for VRUs to be appropriately recognised in this strategy. Whilst we support the strategy's overarching objective, *to promote public safety*, we believe it lacks adequate consideration for members of *the public* who are most at risk from heavy vehicle-related incidents. Alarming, **whilst heavy vehicles constitute only 4% of vehicles on the road, they are involved in up to 50% of fatal cyclist and pedestrian crashes that occur in urban areas**<sup>1</sup>. This is a very stark problem that should, at the very least, be referenced to frame the potential for harm to VRUs as a priority for the heavy vehicle sector. Most importantly, it is imperative that the strategy adopt targeted objectives to account for the overrepresentation of VRUs in the yearly deaths on our roads.

There are several ways in which the strategy can demonstrate a stronger commitment to ensuring safer road sharing between heavy vehicles and VRUs:

---

<sup>1</sup> Garrat, M, Johnson, M & Cubis, J (2015) *Road crashes involving bike riders in Victoria, 2002–2012: an Amy Gillett Foundation report*. <https://www.amygillett.org.au/wp-content/uploads/2015/09/Road-crashes-AGF-Report-FINAL-Sept-2015.pdf>

## - Approach to partnerships

When it comes to the strategy's approach to partnerships, there is capacity to expand to support better training and a higher level of driver competency. This can be achieved through recognising and endorsing high-quality VRU awareness training initiatives that target safe heavy vehicle interactions.

One such initiative is the AGF Sharing Roads Safely (SRS) program<sup>2</sup>, which was designed to improve heavy vehicle driver awareness and increase the safety of VRUs. The program was developed in consultation with government and over forty stakeholders from across the construction and logistics sector. It is based on international best practice. In particular, the course was informed by Safe Urban Driving, the heavy vehicle driver training course developed by Transport for London and the heavy vehicle industry as part of the Construction Logistics and Community Safety (CLOCS) program. The UK course has been delivered over 100,000 times and demonstrated significant reductions in crashes between heavy vehicles and VRUs.

SRS is the AGF led adaptation of Safe Urban Driving for the Australian context. Piloted in September 2018, the program is now being conducted regularly in Melbourne and includes three modules (online, facilitated workshop, on-road walking and cycling). The training provides drivers with a first-hand experience of the challenges faced by VRUs. After completing the course, drivers are more aware of and have been provided with skills to safely interact with VRUs and reduce the likelihood of a crash resulting in death or injury.

The AGF supports a future where awareness training courses, such as the SRS, become the industry standard and a requirement for national heavy vehicle driver licencing.

## - Creating positive change in individual behaviours and industry culture to improve safety

In terms of creating positive change in industry culture to improve safety, we recommend that the strategy adopts the messaging of the Safe System approach, which upholds that safety is a shared responsibility and that we will all make mistakes. These principles help to nurture mutual respect for others on the road and a culture that places a high level of importance on safety. In Australia, the Safe System approach has been successful in shifting the focus of crash events away from the individual road users involved to recognise the need for broader, system-wide responsibility and action.

---

<sup>2</sup> For more information on Sharing Roads Safely, see: <https://www.amygillett.org.au/sharing-roads-safely>

In addition to reinforcing the need for everyone to take care on the road, the adoption of the Safe System approach will also help to create consistency across all stakeholders in the road safety space, as its principles underpin the National Road Safety Strategy<sup>3</sup>.

In order to influence positive behaviour change at an individual level, we recommend placing further emphasis on educating the drivers and not just the *broader community*, as is alluded to on pg. 3 of the document. Driver attitude and the broader driver culture can be very difficult to shift. Nevertheless, the SRS program is already having a positive impact on drivers' awareness, behaviour and attitudes towards VRUs. As a result of the training completed so far in Melbourne, over 90% of respondents have said they have a better understanding of issues faced by VRUs and over 80% will change their behaviour around VRUs. Notably, the SRS program is rooted in the Safe System approach and the principle that 'people make mistakes but those mistakes should not result in death or serious injury'.

- **Driving uptake of modern, safer heavy vehicle fleets that reduces the likelihood and impact of crashes**

When considering the uptake of new heavy vehicle technology, it is critical that the impact on the safety of VRUs is thoroughly considered. This is particularly important to avoid unintended consequences that are foreseeable if the impact is considered from the perspective of the VRU. There is currently no consideration of VRUs in this component of the draft strategy.

Technology has a big part to play in reducing the high casualty rates associated with heavy vehicles. There is already technology that addresses driver fatigue through monitoring, autonomous emergency braking and technology that is capable of detecting cyclists and pedestrians. This needs to be integrated into the heavy vehicle fleet as a matter of urgency. The AGF is optimistic that advancements in connected and automated technology in heavy vehicles can lead to improved road safety outcomes for all road users.

All too often, however, VRUs are treated as a secondary consideration for motor vehicle manufacturers. To date, technological advancements with regard to communication have largely focused on motor vehicle to motor vehicle (V2V) or connecting motor vehicles to infrastructure (V2I)<sup>4</sup>. Both of these approaches overlook the people moving on our roads who are not inside a motor vehicle, namely VRUs such as cyclists and pedestrians. In order to effectively reduce the likelihood and impact of heavy vehicle crashes in Australia, future

---

<sup>3</sup> National Road Safety Strategy (2020) *Safe System Principles*. <https://www.roadsafety.gov.au/nrss/safe-system>

<sup>4</sup> Amy Gillett Foundation (2018) *Submission to Inquiry into heavy vehicle safety and the use of technology to improve road safety*. <https://www.amygillett.org.au/wp-content/uploads/2021/04/Amy-Gillett-Foundation-Submission-to-NSW-Inquiry-into-heavy-vehicle-safety-and-the-use-of-technology-to-improve-road-safety-190218.pdf>

technological uptakes must include and account for this underrepresented demographic of road users.

There is an opportunity for this strategy to strive for global best practice that seeks to place VRU safety at the centre of technology considerations for heavy vehicles. The Safer Lorry Scheme<sup>5</sup>, developed by Transport for London, provides an excellent starting point and may offer guidance on how to embed VRU safety into the heavy vehicle fleet. AGF supports a more ambitious approach to this topic than is currently offered in the draft strategy.

#### - Influencing road network design to support safe heavy vehicle use

Under the heading of *safe heavy vehicle road use*, the strategy focuses solely on risks posed by *operators taking unlawful actions*. This narrow perspective ignores the Safe System principle that *everybody makes mistakes*, and thus excludes an entire array of potential non-infrastructure safety solutions. A more comprehensive understanding of high-risk heavy vehicle interactions must consider the risks posed by both lawful and unlawful actions taken in areas of high VRU density, such as urban areas, where one mistake may lead to critical consequences.

Commercial and heavy vehicle activity in Australia, particularly in urban areas, is increasing to unprecedented levels to support population growth and over 40 major transport projects currently being built. This increase raises concerns about public safety, particularly in urban areas, where there are an increasing number of VRUs. In this context, it is critical that a Safe System approach of shared responsibility is adopted; whereby, the ‘system managers’ have a primary responsibility to provide a safe operating environment for road users. They include the government and industry organisations that design, build, maintain and regulate roads and vehicles to **cater for all groups on the road**.

Improving high-risk heavy vehicle interactions with VRUs should be a priority when it comes to conversations about safety.

---

<sup>5</sup> For more information on the Safer Lorry Scheme, see: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/safer-lorry-scheme#on-this-page-0>

## Recommendations:

The AGF recommends for the strategy to:

1. Adopt the Safe Systems approach to road safety as a set of guiding principles to frame and inform strategic priorities
2. Expand the motor vehicle-centric definition of *other road users* beyond *light vehicle drivers*, as referenced on pg. 5, to explicitly include all VRUs
3. Consider the safety of VRUs in relation to any new heavy vehicle technology
4. Endorse that all new technologies introduced into the heavy vehicle fleet are reviewed by VRU experts with the aim to reduce safety risks being introduced to non-occupant road users (e.g. cyclists and pedestrians)
5. Make it a priority to recognise and engage with high-quality education programs that target industry driver awareness of VRUs to increase safe interactions between heavy vehicles and other road users.
6. Consider endorsing and facilitating the national roll-out of the AGF SRS program, which aligns closely with the strategy's objectives and priorities.

Please do not hesitate to contact me directly if you have any questions or require any additional information.

Yours sincerely,

*Daniel Kneipp*

Daniel Kneipp  
Chief Executive Officer  
**Amy Gillett Foundation**

80a Turner Street, Port Melbourne Victoria 3207

P: 03 9881 1550 E: [info@amygillett.org.au](mailto:info@amygillett.org.au)

[www.amygillett.org.au](http://www.amygillett.org.au)

ABN: 46 200 981 503 / ACN: 118 522 375