

## **INQUIRY INTO HEAVY VEHICLE SAFETY AND USE OF TECHNOLOGY TO IMPROVE ROAD SAFETY**

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To Whom It May Concern

As the largest privately-owned logistics company in Australia, Linfox welcomes the opportunity to assist the important work of the [NSW Joint Standing Committee on Road Safety](#) through the Staysafe Committee is via the [Inquiry into Heavy Vehicle Safety and the Use of Technology to Improve Road Safety](#)

Noting the industry discussion around heavy vehicle safety, Linfox would like to emphasise its support of the use of incab telematics and black-box technology to improve heavy vehicle road safety and as such supports the the Australian Logistics Council's recommendations:

1. To improve safety outcomes, the *Heavy Vehicle National Law (HVNL)* should require heavy vehicles to carry telematics equipment.
2. Relevant legislation (including the HVNL) should set out:
  - (a) the information that should be recorded; and
  - (b) the circumstances where enforcement officers can access information; and
3. The HVNL should be identified as the law regulating telematics in heavy vehicles.<sup>i</sup>
4. The HVNL should be accordingly be amended to:
  - (a) allow the making of some form of legislative instrument that contains:
    - (i) something like the Data Dictionary currently maintained by Transport Certification Australia (**TCA**), that can be amended from time to time as recording requirements for either safety or other purposes are subsequently added by other Australian laws so there is a common set of data definitions to facilitate the collection, exchange and use of data and information; and
    - (ii) privacy standards that must be met by those eligible to access the personal and business information of a transport operator;
  - (b) allow amendments to primary legislation so that:

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<sup>i</sup> For completeness, heavy vehicles are regulated using the applied legislation model. NSW is one of those jurisdictions participating in the relevant national scheme and so generally applies the *Heavy Vehicle National Law (Queensland)*: <https://www.legislation.qld.gov.au/view/whole/html/inforce/current/act-2012-hvnlq>. Jurisdictions not participating in the national scheme (WA and NT) would need to enact 'mirror' laws if they were to participate.

- (i) road transport operators are required to use software or hardware applications certified by the vendor as satisfying data dictionary standards and to maintain data as required by an Australian law;
- (ii) an offence of falsely representing that a software or hardware application satisfies a particular statutory requirement could also be created against a vendor if trade practice laws relating to the making of false and misleading claims are considered insufficient;
- (iii) if considered necessary, a capacity to prescribe an industry standard that must be met to maintain recorded data; and
- (iv) offences are created to penalise activities such as tampering with hardware or data.

Furthermore, Linfox would like to make comment on the following questions from The Inquiry:

- *The development of connected and automated vehicle technologies specific for the heavy vehicle industry and opportunities for further development in this space.*

Faced with an increasing freight task and a shrinking and aging driver workforce, the logistics industry needs to consider autonomous vehicles if it is to meet demand in the future. The first potential benefit is safety, 90 per cent of all road traffic accidents are caused by driver error.

In theory, self-driving vehicles equipped with advanced sensors, spatial imaging software and avoidance algorithms can constantly monitor and adapt to traffic and weather conditions and avoid obstacles more effectively than a human. To prove this for heavy vehicles, testing needs to be conducted on a much larger scale. Algorithms and computing power need to evolve to accurately assess the movement of multiple road users and other hazards.

At full automation, trucks would be able to travel 24 hours seven days a week without a break. With a shift in regulations, a driver could be resting and moving at the same time. Advances in information sharing, vehicle-to-vehicle and vehicle-to-infrastructure, could help reduce trip time by avoiding and potentially reducing traffic congestion.

Linfox already has a level of automation in its fleet. While exact configurations depend on customer requirements, our newer trucks include lane departure warning systems, fatigue warning systems and autonomous emergency braking systems. In some vehicles an assessment of technology that includes driver head and eye gaze tracking has been undertaken.

Fully autonomous vehicles are expected to be on our roads in the next decade, but much work is to be done for policy and perceptions to catch up with the technological capability. A clear and consistent regulatory environment and automated vehicle standards are essential but will take time to achieve. Just as important are well-maintained road markings and signage.

- *Compliance and enforcement to maintain the safety of heavy vehicles on our roads*

Linfox fully supports the ongoing commitment to on road enforcement by state and territory regulatory authorities and regularly works with state-based authorities including the RMS in order to better understand, inform and support their role through participation and customer education.

- Heavy vehicle safety strategies implemented in other jurisdictions, both domestically and internationally

Cross jurisdictional planning is essential: Linfox believes all three levels of government have an important role to play in ensuring the amenity to all users of our transport networks and, importantly, freight and employment precincts. While the need for coordination is ordinarily understood as one between Canberra and the States, or alternatively between state and local government, more effective regional collaboration between councils spanning metropolitan geographies is an oft-overlooked area for improvement. Notwithstanding that, Linfox notes the important role that bodies such as the National Heavy Vehicle Regulator (NHVR), Transport for New South Wales (TfNSW), VicRoads, and the City of Melbourne have played in recent times in working with industry on issues surrounding congestion, delivery windows and major works.

Safety and compliance, and national coordination on frameworks governing vehicle and infrastructure automation and connectivity: Safety and compliance is the number one focus for Linfox Logistics, reflected in our company's Vision Zero ethos. In other sectors of the transport industry, there has been a highly publicised move away from strictly-regulated and standardised training requirements for drivers and safety standards for vehicles, consistent with the entrance into the market of ridesharing operators with low to no barriers to entry. Industry concern at such trends is well understood. There's a reason our industry is as closely regulated as it is; given the safety risks attendant to fly-by-night heavy vehicle aggregators.

Linfox believes there is no place for grey areas, or overlooking non-compliance in the transport industry. For this reason, Linfox fully supports the introduction of a national legislative framework to implement Heavy Vehicle National Law (NVNL). Linfox also believes there is significant potential in vehicle to vehicle (V2V) and vehicle to everything (V2X) communication, which are key enablers of both increased vehicle and network automation. To help realise increases in safety and productivity that increased automation can deliver, a nationally consistent legislative framework supporting the testing and implementation of automated vehicle (of all types) and infrastructure solutions is key, as well as a framework that is able to be adapted as these dynamic technologies continue to rapidly evolve – these rules cannot be set and forget.

- The road toll during the period from 1 December 2017 to 31 January 2018  
Safety is our number one priority at Linfox and is supported by our dedicated Vision ZERO safety program. Linfox is always looking for new ways to improve and promote road safety. Recently, Linfox partnered with the Transport Accident Commission to [develop a video series where drivers spoke candidly](#) about the road as their workplace.

We would welcome the opportunity to present a safety presentation to the Inquiry to provide a clear view of the safety issues faced on a daily basis and the steps, systems and culture that Linfox has put in place to eliminate, minimise and mitigate them in its operations.

Thank you for the opportunity to inform the deliberations of this Inquiry.

Sincerely



Mark Mazurek  
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Linfox Logistics ANZ