HEAVY VEHICLE
INDUSTRY AUSTRALIA

HVIA Submission

Vehicle Safety Discussion Paper

June 2021

Heavy Vehicle Industry Australia
Represents and advances the interests of manufacturers and suppliers of heavy vehicles and their components, equipment and technology.

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1) Background

In April 2021 the Department of Infrastructure Transport Regional Development and Communications issued a Discussion Paper on Safer Freight Vehicles which examines possible changes to the Australian Design Rules (ADRs) to facilitate increased uptake of safer and more efficient heavy freight vehicles in Australia. This paper is a response to the National Road Safety Action Plan 2018-2020 which called for removal of barriers to the uptake of safer vehicles.

The paper pulls together a range of initiatives around indirect vision devices, vehicle width changes and axle configurations which have been under discussion over the last couple of years and seeks feedback from all interested parties by 30 June 2021.

This submission summarises the views of HVIA members on the proposed changes to items raised in the discussion paper.

2) Indirect Vision Devices

HVIA is supportive of the proposed changes to these ADRs as outlined in the discussion paper. These items have been discussed extensively at the Technical Liaison Group and HVIA is happy to support changes in line with the recommendations of that group.

3) Axle Configuration Changes

HVIA is supportive of the proposed changes to these ADRs as outlined in the discussion paper. These items have been discussed extensively at the Technical Liaison Group and HVIA is happy to support changes in line with the recommendations of that group.

4) Width Options Presented in the Safer Freight Vehicles Discussion Paper

Vehicle width has been raised as a potential regulatory barrier to the uptake of safety features. The argument is that increasing truck width would allow trucks with safety and environmental features developed for overseas markets to be more readily adapted to Australian markets.

The options presented in the Safer Freight Vehicles discussion paper are similar to, but not exactly the same, as the options canvassed in the examination of vehicle width issues by Austroads in 2019 and with discussions at the Strategic Vehicle Safety and Environment Group (SVSEG) meetings.

The original proposal outlined by Austroads was for an initial width increase to 2.55m including load restraint devices. With a potential move to 2.6 m to be considered later after an evaluation of the impact of the move to 2.55m.

The current proposals look at four options. Options 1a and 1b both contemplate increasing width to 2.55 m with exemptions for attachments such as load restraint devices out to 2.6m. Option 1a would apply these changes to both trucks and trailers and option 1b applies these changes to trucks only. Option 2a looks at increasing widths for both trucks and trailers to 2.6m with load restraint devices out to 2.65m while option 2b look at the same increases but only applies these to trucks.

Access to the increased widths would only be allowed for vehicles which fit a specified list of safety features. To access the increased widths, trucks would need to fit specified safety features including indirect vision devices, Electronic Braking Systems (EBS), Autonomous Emergency Braking Systems

(AEBS), Lane Departure Warning Systems (LDWS), blind spot systems, side underrun protection and conspiquity markings. Trailers would only be required to fit side under run protection and conspiquity markings.

5) Industry Attitudes to Changing Heavy Vehicle Width

Within the heavy vehicle industry there is a divergence of views on changes to vehicle width.

Truck manufacturers generally favour a change to the regulations to allow wider vehicles as it would reduce the cost of bringing internationally designed or manufactured trucks with advanced safety features and lower emissions into Australia.

However, HVIA is also of the view that any increases in width should be considered in conjunction with increased steer axle masses. If steer axle masses are not increased, the potential safety and environmental benefits may not materialise by increasing width alone. Without increases to axle mass limits the additional mass of the safety equipment will reduce the payload of the vehicle. This reduced payload may act as a disincentive to purchase a new vehicle, directly reducing freight productivity, and slowing the uptake of the very safety equipment that the government is trying to mandate.

HVIA is of the view that the productivity benefits of increasing the width of truck bodies are generally very small, and an increase in the allowance for load restraint devices cannot be justified on safety or productivity grounds.

Component suppliers, such as axle suppliers and brake manufacturers, generally appear to be neutral on the issue. Most have global operations that cater for the North American and European markets so will be able to adapt to the change. However, changes to the vehicle width may force component suppliers to stock both 2.5 and 2.55m wide components which will increase their inventory costs.

Some specialised component suppliers, such as some of the crane manufacturers, are strongly in favour of the change. However, recent changes to the PBS scheme to facilitate the fitment of these cranes has already addressed some of the crane manufacturers concerns. This decision was implemented under the current regulatory framework.

Australian trailer manufacturers and bodybuilders have a variety of views depending on which segment of the market they operate in. However, as a general comment it appears that most trailer manufacturers are against changing vehicle width. The attitudes of trailer manufacturers are driven by several factors:

- The key argument against wider trailers is that changing to wider vehicles is likely to be expensive for many manufacturers due to the need for re-tooling their production facilities.
- However, in some specific segments of the trailer market there may be some safety and productivity benefits.
- There are no width related barriers to fitting side under-run protection or conspiquity markings to trailers so it is unlikely that a change to width would incentivise the uptake of these features.
- It is also true that most heavy combination vehicles are mass constrained, meaning the additional width of the trailers will not provide productivity benefits to outweigh the implementation costs to industry and the safety risks to the community.
- The current PBS scheme provides an avenue for those segments where increased width would be of benefit.

- Many combination vehicles do not have general access to the road system due to their performance characteristics. Therefore, the willingness of road managers to provide access to wider combination vehicles may be another barrier that needs to be considered.

Additional international competition from low wage and low-cost countries, places the Australian manufacturing industry at a disadvantage. This will be a particular problem during the transition period and may also prevent manufacturers recovering the cost of re-tooling.

6) HVIA Position on Vehicle Width

HVIA supports an increase in the allowable width of trucks which fit the required suite of road safety features to 2.55 m.

However, given that most truck bodies are fitted to a cab chassis vehicle and will not impact on the fitment of the safety features, HVIA does not believe the exemption to allow load restraint devices to go out to 2.6 m can be justified on either safety or productivity grounds. Increasing the widths on truck bodies would result in additional transitional cost for bodybuilders.

HVIA does not support increases to trailer widths because the cost of the retooling, transitional costs and potential loss of Australian manufacturing jobs, far exceed any safety or productivity benefits.

HVIA accepts that there may be specific markets where the safety or productivity benefits may justify increased widths on specific categories of routes. For example, it is possible that there may be benefits to the refrigerated and freezer segment where additional width would allow these vehicles to increase their thermal efficiency and these vehicles do not travel on all routes in the network.

However, HVIA believes these specific circumstances can be addressed within the Performance based Standards (PBS) system or that a specific Regulatory Impact Statement (RIS) or Productivity Commission report should evaluate this option.

If HVIA has to choose between the four options outlined in the discussion paper, HVIA believes option 1b is the best of the options.

7) Transition Arrangements

The Heavy Vehicle industry is one of the important manufacturing sectors remaining in the Australian economy. Unlike the car industry, the heavy vehicle industry in Australia has survived without subsidies from the taxpayer.

Any changes which would adversely impact this industry need careful analysis and it is important that Government proceeds with caution. The timing of the changes and the details of the transition arrangement are critical.

HVIA is strongly opposed to changes to trailer width, but if the government does decide to change trailer width, manufacturers who would require retooling must be compensated by a targeted assistance package to defray the costs of the transition. These Australian businesses have invested heavily in tooling and systems based on existing ADRs, if this was to change, then many of these businesses will lose or have these investments compromised.

HVIA is therefore seeking an undertaking from Government that no Australian manufacturer will be disadvantaged and would challenge the Government to quantify the reasons (including the safety and productivity benefits) they are relying on in making such a decision.

We would also insist that sufficient transitional funding would be put in place to guarantee this.