



5 November 2018

Ms Amanda Capper
Manager Safety Systems
National Heavy Vehicle Regulator
PO Box 492
Fortitude Valley QLD 4006

Email: safety@nhvr.gov.au

GEA comments on draft NHVR safety policy

Dear Ms Capper

Gas Energy Australia (GEA) is pleased to provide comments to the National Heavy Vehicle Regulator (NHVR) regarding the draft NHVR safety policy. GEA is the national peak body which represents the bulk of the downstream gaseous fuels industry which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain; refiners, fuel marketers, equipment manufacturers, LPG vehicle converters, consultants and other providers of services to the industry.

GEA considers that the NHVR safety policy should be aligned with the National Road Safety Strategy and be built around the four 'cornerstone' areas of the strategy:

1. safe roads;
2. safe speeds;
3. safe vehicles; and
4. safe people.

While the NHVR Safety Policy covers speeds, vehicles and people that are controlled under the regulations, it does not seem to include the vital feedback loop of intelligence that would allow infrastructure providers and planners to build safer roads.

GEA contends that feedback and information particularly in the areas of fatigue management and chain of responsibility can help produce safer roads for heavy vehicles to travel on. It is within this context that GEA urges the NHVR to enhance the draft NHVR safety policy by working with stakeholders to include dissemination of intelligence to make our roads a safer place. This enhancement would fall under the scope of the draft NHVR safety policy as it applies to all regulatory and operational activities and seeks to continuously improve safety outcomes based on risk and evidence based practices

GEA suggests that while NHVR has a mandate to ensure compliance with regulation, it also has the ability to provide sound input into infrastructure planning processes to make our roads safer for all. To illustrate the point, NHVR fatigue management require regular rest breaks. The NHVR monitors breach and offence levels in relation

to fatigue management. By using this information in conjunction with traffic flow and congestion information, infrastructure providers would be better placed to plan rest and parking areas for heavy vehicles.

While only a simple change, providing feedback to infrastructure providers and planners would enhance the NHVR's ability to improve the road experience for all users.

GEA thanks the NHVY for the opportunity to contribute to your review of the draft NHVR safety policy and looks forward to contributing to a safer heavy vehicle industry.

For your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Griffiths', with a long horizontal flourish extending to the right.

John Griffiths
Chief Executive Officer