

Submission – PC National Transport Regulatory Reform, 2019

Dear Sir/Madam,

I would like to make the following submission to the PC in regard to National Transport Regulatory Reform Inquiry, 2019.

This is a personal submission based on about 20,000km travelled a year in my small car and my personal observations over nearly 47 years of driving.

Kind Regards
Linda Di Mauro

Background:

“What has the Commission been asked to do?”

The terms of reference for the inquiry (attachment A) require the Commission to:

.....

- ***identify opportunities to further integrate and harmonise the national freight market and the current focus and remit of the three national regulators.***

Broader COAG reform goals are to be taken into account, and the Commission is to have regard to complementary reforms, including (but not limited to): rail standards harmonisation and interoperability; improved network access for higher productivity vehicles; and the development of the National Freight and Supply Chain Strategy.” (Issues Paper, page 1)

Comment – points:

1. Freight truck, transport bus and other commercial drivers, particularly for longer distances, have a difficult job

As I mentioned above, I drive about 20,000 plus kilometres a year in my car, mainly solo. I have also travelled as a passenger on busses including four 800 kilometre trips over the past 12 months.

On highways I often notice trucks and buses overtaking slower vehicles often cars, caravans, SUVs etc. These trucks and buses are not exceeding the speed-limit and it is very difficult to overtake when it is a single lane each way.

Overtaking lanes are intermittent and often too short which often means that overtaking trucks or buses prevent other more nibble vehicles from overtaking. Often slower vehicles accelerate on overtaking lanes thus preventing faster vehicles overtaking. However, even dual-carriageways can be frustrating when a truck is only marginally faster than the truck being overtaken and they must not exceed the speed limit.

I have observed as well as hear heavy vehicles travelling at night - I live about 1km from the Princes Highway near a bridge and hear heavy transport travel over the bridge particularly

from about 3.00am. When driving south from the Gold Coast in very heavy rain at about 10.30pm in October 2018, I noticed a continuous chain of B-Double trucks on the highway.

Truck drivers I have spoken to say that night-time is 'Sesame Street' time – 'when the trucks come out to play'.

There is little doubt that many trucks/commercial vehicles are on the roads at night as they have deadlines such as deliveries by the following morning.

However, in my view, many trucks travel at night because it is too frustrating to be on the roads in daylight hours. I certainly prefer to drive at night where possible just to avoid slow drivers.

The questions are what proportion, the impact on road accidents, as well as the health consequences for these drivers, and for wildlife?

As part of this inquiry, I urge the Commission to:

- **Talk with individual truck and bus drivers** – not just associations or owners – to hear their views.
- Look at overseas practices and consequences **for particular types of roads** travelled and their speed limits.
- **Consider making the speed limit mandatory in daylight hours**, unless in unfavourable weather conditions, and vehicles not travelling at the speed limit be obliged to pull over to allow faster vehicles to overtake.

2. Some speed limits are dangerously slow

I find that driving on certain roads at the speed-limit sends me to sleep (eg Hume Highway between Goulburn and Melbourne; Braidwood in the 80km zone either side of the town). I stop every 2 hours or more often but that does not prevent my fatigue.

In my view, a 'speeding' (up to 15km above the speed limit) driver is not necessarily a dangerous driver. Indeed, I have witnessed many near accidents involving vehicles doing below the speed limit. Today's population is largely very time poor even when on holidays, and the frustration of vehicles doing below the speed limit, coupled with few and very short overtaking lanes, means that high risks are taken by some drivers.

I note that **road-deaths caused by fatigue are increasing**.

- What are the impacts of slow speed limits on truck and bus drivers, generally very experienced and professional?

As I understand it, road speed limits were determined many decades ago and any subsequent revisions are always to reduce limits, generally as a knee-jerk reaction to an accident. Yet, the technical and safety qualities of trucks/cars etc have improved exponentially over the past few decades.

- **There is no doubt that speed does kill, however, could that be because of too slow a speed – at least on some roads?**

I would urge the Commission to:

- Investigate the road rules for commercial and other vehicles and outcomes on roads such as the autobahns/auto-stratas with high speed limits in Germany/Italy and look at the accidents and fatalities on the fast roads, and also the experience in the Northern Territory.

3. Speed limits for road-works

I have lost count of the number of sightings of a road-work in progress sign threatening speed limit enforcement, however, without any road work in sight. In 2018 on two separate trips to Melbourne, I recall a long stretch on the A1/M1 Hwy about 200km east of Melbourne with 'road-work' signs and reduced speed-limits, however, without any sign of road works being undertaken nor work undertaken in the period between the two trips.

- If I find that frustrating, how do buses and trucks cope? Similarly for 'road-works' well away from the road, or 'road-works' on week-ends when there are no safety issues for vehicles at that time.

I would urge the Commission to investigate the issue of road-work signage with a view to improving productivity for all transport - trucks, buses, commercial vehicles, cars, etc.

4. 'Speeding infringements' and revenue raising

In all my driving years (nearly 47 years), I have yet to see a mobile speed camera or police patrol at a dangerous part of a road, or in places with high visibility from the road so that drivers can be warned to slow down for safety. I have always seen these at the bottom of hills (where many cruise controls do not hold), where speed-limits change, within 100 metres of a much higher speed where vehicles are accelerating to the higher speed, at the end of an intermittent over-taking lane, etc.

- **This means that police and speed camera resources are being directed at revenue raising and not road safety**, thus raising the cynicism of driving population and indeed in regard to the police in general.

I am particularly careful during the months of May and June as I realise that speed-enforcement units (mobile cameras, police, etc) are striving to achieve their likely un-met revenue targets, as well as holiday seasons for a good return to revenue.

- If I am that cynical of so-called speed-enforcement activities, what do truck, bus, commercial vehicles drivers think, and what measures do they take to avoid these?

In my view, consideration should be given to:

- changing police and speed camera revenue (also known as 'speeding') targets to a target of continual reductions in road accident and fatalities in each policing precinct. **The performance-pay of key leaders (police in particular) in this regard should be dependent on this criterion, and not revenue raising through speeding and similar activities.**

- This means police should be given the discretion (with robust transparency, oversight and appeal mechanisms) to book any driver they consider dangerous on the roads. This is not the same as any driver exceeding the speed limit.

5. Drivers' abilities

In my view, there are good reasons why road accidents and fatalities increase during the holiday periods. One of these is poor driving abilities:

- inexperienced in driving outside of highly controlled urban areas;
- inexperienced in towing caravans, horse-floats, etc;
- slow-response times due to age or other abilities.

I feel sorry for the professional drivers who are always on the roads.

I urge the Productivity Commission to look at overseas practices and outcomes with a view to:

- **introducing tiers of driving licences –**
 - urban driving only;
 - urban and regional driving;
 - urban, regional and towing (including the ability to prevent fish-tailing and reverse parking);
 - commercial truck, bus, large commercial vehicles, etc.
- continue age testing with a focus on speed (ability to maintain a mandatory speed limit) and response times.

6. Bicycles and electric scooters off all highways

Bicycles should not be permitted on highways, including highways through towns and urban areas, unless there is a dedicated cycle path to which bicycles should be restricted to only use. For example, St Kilda Road Melbourne which is also the Nepean Highway. Though not many instances, I have noted bicycles on highways which again makes it very unsafe for overtaking vehicles, particularly trucks and buses, and on-coming vehicles..

Similarly, electric scooters should not be permitted on any roads unless these are crossing the road from one to another footpath. Consideration should be given to mandatory safety helmets for users of electric scooters, as well as limiting their speed to a walking-pace (eg 6km per hour).

7. Nationally consistent road rules

For the sake of productivity, not to mention sanity, road rules should be identical in each state/territory in Australia. Drivers should not have to concern themselves with which state/territory they are in and the relevant rules applicable.