

Safety Policy

Feedback Form

This form should be used to provide comments on the draft NHVR Safety Policy. The NHVR is interested in whether you agree with the principles outlined in the policy.

Completed feedback forms should be submitted by email to safety@nhvr.gov.au by Monday 5 November 2018.

Comments:

The ATA welcomes the development of the NHVR's Safety Policy and the opportunity to comment on the draft document.

As a general comment this policy is lengthy and could be made more concise through the removal of unnecessary background information and editorial.

Detailed feedback by section:

Purpose

The purpose stated in the opening paragraph of the policy is inconsistent with the *Heavy Vehicle National Law*.

The HVNL requires the duty holder to ensure the safety of their transport activities so far as is reasonably practicable (HVNL, s26C (1)).

Policy statement

Paragraph three should read:

This policy is intended to encourage the continuous improvement of industry safety in line with the terms of the *Heavy Vehicle National Law*.

Principles (4.)

This paragraph is ambiguous and needs to be removed or re-written to offer clarity.

Focus on risk and evidence based practices

An additional paragraph should be added at (13.) This should read

The NHVR will respond promptly to safety recommendations from independent no blame safety investigations, coroner's investigations and other enquiries.

Commitment to stakeholder engagement

15. The NHVR is committed to building and maintaining effective working relationships with:

(a) Stakeholders throughout the heavy vehicle industry including industry associations at the national, state and sector level.

Using technology to improve safety outcomes

23. The NHVR recognises the potential of technology to improve safety outcomes and supports the development and adoption of innovative technologies throughout the heavy vehicle transport industry.

26. Remove this paragraph, it is unnecessary editorial not a policy principle.

Embarking on work health and safety

This section (33 to 38) should be removed from the policy. The NHVR's development and management of internal work health and safety systems and culture, although vitally important, is not directly relevant to the duty holder that the NHVR regulates.

The NHVR's recognition of its statutory obligations under the *Work Health and Safety Act* should be set out in a separate statement aimed at its internal audience.

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