



Brisbane Central Business District Bicycle User Group

CBD BUG

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The Honourable Mark Bailey MP
Minister for Transport and Main Roads:
GPO Box 2644
BRISBANE QLD 4001

Via email to: transportandmainroads@ministerial.qld.gov.au

Dear Minister

I write on behalf of Brisbane CBD Bicycle User Group (CBD BUG) members to seek your action to improve safety for vulnerable road users from the risk posed by heavy vehicles.

We are now approaching six years since the Queensland State Coroner's report on the death of Rebekka Meyer was released. That report noted the "inherent danger of laden conventional trucks operating within congested city environments, particularly with respect to the limited forward vision from the driver's position of these vehicles".

Recommendation 7(i) of the Coroner's report was that "Conventional shaped heavy vehicles should be prohibited unless they are fitted with appropriate technologies to warn the driver of any obstacles or other road users within the forward blind spot of the truck".

While a coroner's inquiry into the 30 June 2020 death of Carolyn Lister is yet to be announced, the media coverage of this crash clearly showed a conventional truck towing a dog trailer was involved.

We note the European Union (EU) has effectively banned the use of this type of heavy vehicle by restricting overall vehicle length. Also, under EU law, blind-spot mirrors have been mandatory for new trucks since 2007, and older trucks have had to be fitted with these mirrors since 2009. The EU also mandates that side under-run protection be used to protect vulnerable road users. Similarly, to improve safety other jurisdictions like London, require trucks to have side under-run protection and mirrors that give the driver a better view of cyclists and pedestrians around the vehicle.

Despite these overseas safety advances, no progress on these issues has been made locally and we are seeing the death of vulnerable roads users as a consequence.

We agree with your statement to the media a few days after Carolyn's fatal crash "that building bike paths to separate riders from motor vehicles was the best way to increase safety". However, we disagree strongly with your other comment also made at that time that heavy vehicle standards reform "needs to be applied nationally" to be effective.

When the Brisbane CDB BUG has previously called for heavy vehicle safety reforms to be adopted in Australia, we have seen our issues referred to standing committees, like the Strategic Vehicle Safety and Environment Group. These committees are stacked with transport/trucking industry insiders who in our view have let the issues stagnate before being allowed to quietly die after a suitable delay.

Another ruse used to obfuscate against calls for reform is the use of cost benefit analysis (CBA). In the case of truck side under-run protection, a CBA used outdated Australian data from 1988 to 2003 that at the time was a minimum of 15 years old. (<http://cbdbug.fea.st/20181210-cbdbug-side-underrun.pdf>)

Furthermore, this CBA did not consider cycling growth in Australia since then, nor plans by state and local government to increase cycling levels. For instance, the Connecting SEQ plan envisages 11% of trips in South East Queensland will be by bike in 2031. Nor did the study consider increasing rates of cycling crashes involving heavy vehicles (see attached article from Courier-Mail)

Governments that adopt truly “world class” and progressive road safety strategies e.g. Sweden, New York City have long since moved to “Vision Zero” strategies, which do not perform economic analyses. To quote Matts-Åke Belin, Sweden’s top road safety strategist, “It can never be ethically acceptable that people are killed or seriously injured when moving within the transport system”.

Another routine way calls for changes are effectively sidelined is the alleged need for a “consistent national approach”. We heard this response many times prior to Queensland’s unilateral introduction of the “one metre passing rule” applicable to motorists overtaking a bicycle rider. What we have now observed since this innovation is other Australian jurisdictions falling into line one by one through also adopting this rule. Here we can see how the “national consistency” rebuff is a ploy to favour vested interests that are intent on stymying much-needed progress in order to maintain the status quo.

With this long history of calls for local improvements to heavy vehicle to make them safer around vulnerable road users, as well as the overseas examples of the same, we are incredulous the new Performance-Based Standards (PBS) scheme of the National Heavy Vehicle Regulator has no such requirements.

The CBD BUG’s position is that reforms corresponding to the EU’s should be included in the PBS via a vulnerable road user interaction section with some very simple tests - to cover forward and side visibility, forward and side under-run protection, noise, fumes, etc. Accordingly, we call on you to take this issue up directly with your transport minister counterparts in the other jurisdictions to have these defects on the PBS corrected as soon as possible. We anticipate a 12-month timeline should not be a stretch target for such essential safety reforms.

As a concurrent approach, we also see an opportunity for Queensland to lead the way and display the same innovation for improved heavy vehicle standards, as it did for the one metre passing rule.

This could be achieved through giving the heavy transport/logistics industry suitable advance warning e.g., 5 to 10 years that tendering for contracts for major Queensland Government projects will only be open to companies who will use trucks meeting the EU standards. Had this approach been taken up following the December 2015 Coroner’s report on Rebekka Meyer’s death we would now be well advanced along such a timeline. We also suggest that through this approach local Queensland companies would be advantaged over interstate competitors.

In closing, we are not saying trucks with low-visibility and other unsafe design elements are not still suitable for hauling stock and other freight along Queensland country roads. We are saying they should not be in cities and urban environments where they pose a serious risk to vulnerable road users.

We look forward to your response on these issues.

Yours faithfully



Paul French
Co-convenor
Brisbane CBD BUG
10 July 2021

Cc: Bicycle Queensland
Space4Cycling Brisbane
Queensland Walks