

Submission to the NTC on the Proposed HVNL Changes

To all it may concern,

I will start by admitting to only taking a brief look at the documents that the NTC has put forward for feedback. So, I apologise in advance if the content of my feedback is misinformed, but I hope that it is of value nonetheless.

I will start by addressing the recommendation for the extension of 19m configurations to 20m. I agree, it should be granted.

This proposal though in my mind is similar to the call for B-Doubles to be allowed to run at 27m, and I think you may want to revisit this proposal as it seems to not be on the table for discussion. The granting of an extra metre to B-Doubles is not (or should not be) about carrying more freight, but allowing companies to give their drivers extra room in their trucks so that they can manage their fatigue more appropriately.

I think to make sure that it doesn't become another grab for an extra pallet space by some companies, there will need to be certain framework about how the extra metre can be used so that it actually benefits the drivers instead of the companies. By simply asking for a single sized mattress and a bit of standing room, and by allowing drivers to have a bonnet and a bull-bar on their trucks which would increase the safety of the occupants in the event of a collision, with wildlife or another vehicle, I don't think is asking too much in this day and age of commitment to workplace health and safety.

I think there should be conditions put on the extension though so that it doesn't become another grab for productivity from companies that see driver's lose even more space to manage their fatigue. Conditions such as making sleepers mandatory, even a 28 inch version for short distance travel, which can be found on many trucks, and limiting distances travelled without having a larger sleeper fitted to the truck, regardless of whether the driver will be in a driver's quarters at the end of their journey or not, will give drivers the ability to rest more effectively mid-journey, which are often 12hr+ shifts.

I think that the NHVR and other governing bodies should be encouraging larger accommodation for drivers in their PBS approvals as well, as this seems to be often overlooked, and 'productivity' being the main focus. But how productive is an unrested driver? How much more productive do you think a rested driver would be?

Also, longer prime movers are significantly smoother than a comparative shorter wheel based prime mover. Imagine the difference between sitting in a comfortable office chair versus an uncomfortable one, and what that does for you at the end of the day. Now, imagine that chair being bounced up and down, and forwards and backwards constantly, and often quite violently, by the state of your environment. That's the life of a truck driver. Have a longer wheel based truck serves to mitigate the effects of driving on substandard roads. I hope you can see my point.

Yes, I know the arguments about longer combinations tracking worse etc. etc. But to say that our roads are designed in such a way that an extra metre in length will suddenly cause far more accidents or incidents, doesn't fly with me. If anything, it comes down to the ability of the drivers to manage their vehicle in a way that doesn't create these incidents, and in my understanding, a metre more in overall length wouldn't increase many of the incidents you see of trucks cutting corners happening.

I also wonder if a driver, who is able to sleep and drive in a more comfortable truck, would perform better in their day to day duties, and be a safer operator on our roads.

Asking for an extra metre for a B-Double, by percentage, is less of a leap than asking for an extra metre for semi's as well.

Furthermore, in my experience, B-Double routes seem to be better developed than semi trailer routes anyway.

Respectfully, I think failing to address this issue in this enquiry is a failure to listen to the industry on the NTC's part. And I hope it's not too late for those in authority to be able to address this before the end of the review.

To that end, for the same reasons that the extension be granted to B-doubles, I think it should also be granted to 19m combinations.

Secondly, my hope is that this review will result in better outcomes for drivers to manage their own fatigue, not for drivers to be placed in a tighter noose. I think educating and empowering drivers to make informed decisions about their own fatigue is what the industry has been calling for for many years. Honest mistakes in record-keeping and silly administration penalties as logbook breaches is incomprehensible as to how that effects the safety of the driver and other road users.

I think submitting a person to a fatigue test would be more effective than a school exam in this case. And there would be a number of ways to conduct such a test due to the advancement in technology. Many companies have implemented this technology off their own bat to keep their employees safe. Maybe having fatigue monitoring devices in trucks would serve as a better safety tool than a logbook completely, and maybe giving concessions for the use of such would see a lot more benefit to the industry than the continued roll out of cameras on every road to force every driver in to an inflexible mould.

I don't think that there is only one solution, but I believe there should be a driver-focussed (not owner-focussed and corporate-focussed) study done in how drivers can effectively manage their fatigue, and concessions for adopting such practices should be given and highly encouraged. Also the development of technology to aid in managing one's fatigue should be encouraged.

I think the idea of just talking to a few people, or the nosiest industry associations in the hope that they represent all drivers is an unfortunate misunderstanding that has led to a lot of mistakes in the past from governments and regulators.

The drivers are at the end of the stick, so they should be engaged with more than the peak bodies and unions.

I think the NHVR's approach to education over enforcement is going a long way to improve the working conditions for drivers, and the attitude towards law enforcement in the industry, and I commend them for that. However, the industry has been beaten over the head by heavy-handed enforcement for far too many years in the past, and we are seeing the effects that has in the increasing numbers of drivers leaving the industry, let alone the lack of attraction to the industry for new drivers.

On that point, I think that removing the enforcement of the HVNL from authorities outside of the NHVR, would be a step towards a more equitable enforcement approach.

I note that others have stated that the fine review process is very inadequate, and stacked against the driver. If a driver is willing to contest a fine, they should be given the benefit of the doubt and the appropriate support to do so. People make mistakes, and that includes enforcement officers, and as I mentioned earlier, so are unfairly and knowingly targeting truck drivers for ridiculous offences, and this needs to stop, and I think having an independent, educated, review process that is informed by drivers, former and present, would be highly beneficial to the industry.

I appreciate your time in reading my submission, and I do appreciate that this is the first proper review of the HVNL in my lifetime, and I am grateful that it is happening now, and not even further down the track, so thank you.

I pray that you will be guided by sound wisdom so that the changes will have a positive impact in our industry, and I sure hope it won't be the last time that the NTC and other government bodies invite this kind of feedback, for the benefit of all Australians.

All the best,

Nick Twidale