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# National Transport Regulatory Reform

Brief comments received before 11/09/2019

No.	Comment
1	General mass limits should be increased to CML limits without the requirement to be mass management accredited. A lot of time is taken up doing NHVAS paperwork that will never sees the light of day again. Mass management may have been relevant 10 years ago but is outdated, irrelevant and time consuming with new CoR rules. Pre approved routes should be gazetted so we don't have to waste time and money re-applying for the same permits every year. There seem to be a trend towards PBS vehicles on newly approved routes. The cost of setting up pbs vehicles and inconsistencies between state and local road managers makes these vehicles impractical for owner drivers.
2	Get all states to agree on 20m singles for road train trucks and update steer axle weights to 7t for triple rated trucks. Get NSW and SA to open up a type 2 RT route to connect the SA to Qld. Eg, hookup at Peterborough and run the barrier highway through broken hill to Cobar n Bourke. It's a insane waste of highway and of decent quality compared to the routes approved in qld
3	More needs to be done about logbooks, in most circumstances the log book is creating fatigue
4	My Grandfather, Father and myself have all been long distance transport operators in Australia Collectively between myself, my family and my drivers, we have 183 years of long distance driving on Australia's sub standard road system. All of this years have been carried out with out one single accident, not one If you average those out at 150,000 kms each year, that equates to 2745000kms travelled with no accidents The problem of the mass exodus of talented drivers from the industry and fatigue will never be fixed until on simple thing is addressed,,,,, THE TRUTH THE TRUTH IS The human body is not meant to be awake and working at 2am in the morning not matter how many cameras you put over roads, no matter how many Police and Transport Officials you have bullying drivers on the side of the road, drivers are still going to feel tired that hour of the morning sometimes, THAT IS THE TRUTH. Young kids are not entering the industry because the authorities have made it to hard to do the job, cameras, more cameras, work diaries, weigh bridges, more cameras Police and Transport Authorities who treat truck drivers like Public Enemy #1, why would they enter the Industry? Why? Not that a man can even take his Son or Daughter in the truck with them anymore like we all did in the day and train them on the job, now OH&S is that tight, kids can not go near a truck anymore. THAT IS THE TRUTH A driver has the weekend off and heads to work on Monday Night at 7pm, one week he can drive for 10 hours straight in the seat and not even feel like he has been working for 1 hour, The next week he might need a 30 minute sleep one hour after he leaves, regardless of what cameras you have over his head and whatever his work dairy states in the front pages, he is human and THAT IS THE TRUTH Driver has 10 hours to complete a run, one week the weather is perfect, the traffic is quite, all is well at home and he is a good mood, the run goes smoothly and he feels great all the way, the very next week, the weather is cold, windy, there are cars getting in his way everywhere and his good Wife is home alone with two sick school kids and asking him why he even does this job anymore? They argue over the phone, he feels cold, lonely and lousy, as a result, he wants to pull up each few hours and have a lay down and a nap to feel a bit better, however he can not, because your damn Safety-Cam- Cameras will screw him over with his work hours in his work diary, so he keeps on going, leading to feeling fatigued while driving. THAT IS THE TRUTH.
5	I run a safe small transport business without any accreditation schemes. I fortunately do not need to worry about access permits for my business but are told by many operators about the difficulty and time frames of doing so that don't align with the reality of rural transport. Driving hours don't often affect me but when they do their is not enough flexibility for unforeseen circumstances which could result in me not being able to make it home, forcing me to spend the night away from home with no real rest despite being less than an hour from home. As a Livestock Transporter I

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am regularly required to use unsafe infrastructure to load and unload my truck causing unnecessary fatigue and time loss.

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- 6      The jurisdictions covered by nhvr seem to learn nothing from experience Nothing in the form of regulating drivers activities is saving lives on the road As u are possibly aware a big portion of freight is not direct work of the company with its name on the door of the truck they are in fact contractors So a journey management plan is produced by the third party not drivers employer who is ultimately responsible for providing a safe work place not the third party I will just give an example Sydney Perth Depart 12 midnight expectation to drive 14 hours rest 14 hours and so on eta Perth about 6am day 4 average speed is stipulated at 90 kph penalties apply for being late Impact on driver 4 night shifts and go flat out all the way GO FIGURE Fatigue management for long distance operations is not rocket science remedies as follows Max time between 7 hr breaks 17 hrs Max work time in 72 hours is 45 hrs(that stops the cowboys) This would be min standard No bfn No afm Distress transport and go to the operators and third parties to impose penalties it will very quickly change attitudes This is not for publication A east coast company working east west into WA fined up to 250000 dollars are now model citizens so it does work

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- 7      Recording of daily load weights in South Australia seems of no benefit.. We fill out loadsheets with weights all year with weighbridge calibrations that are only looked at, at audit time ..of which out of a possible 800 loads they audit 5.. This seems like a waste of my time considering it doesn't need to be filled out in other states.. Our weights are self regulated as if we overload by 1 kilogram at the mills we deliver to we are given a mandatory day off resulting in a days lost income .. Also we have complained endlessly about being stuck in line ups at mills waiting to unload for up to 2 hrs and being forced to move up the queue every 10 mins .. The mill ignores our complaints and we have rung NHVR numerous times with no follow up ..this Is South West Fibre mill at Myamyn Vic so are we meant to just continuously put up with being forced to break fatigue laws.. this seems ridiculous ..!!! Would also love to see length laws changed to allow me to have my 909 KENWORTH 50 inch sleeper with 34 pallet trailers legal.. As I spend up to 5 weeks away at a time this bunk space makes life a whole lot more bearable.

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- 8      Drivers need to rest when they are tired not when a book tells them too
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