

**Submission
No 33**

SPEED LIMITS AND ROAD SAFETY IN REGIONAL NSW

Organisation: Transport Workers' Union of NSW

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**Joint Standing Committee on Road Safety
Inquiry into speed limits and road safety in regional NSW**

Submission – Transport Workers' Union of New South Wales



Transport Workers' Union of NSW

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Introduction

The Transport Workers' Union of New South Wales (TWU) represents tens of thousands of men and women in Australia's road transport, aviation, oil, waste management, gas, passenger vehicle and freight logistics industries.

With over one hundred years' experience representing the workers who conduct Australia's crucial passenger and freight transport, the TWU has been proactive in advocating for the establishment and improvement of industry standards which advance the lives and safety of transport workers, their families and the community at large.

The TWU welcomes the opportunity to make this submission to the Inquiry into speed limits and road safety in regional NSW (the Inquiry). For TWU members, our state's roads are their workplace. Our members are affected by the road rules more than any group, and yet despite this it too often seems that transport workers are overlooked and/or forgotten about when decisions about their workplace are being made.

As an industrial organisation representing members who use NSW roads every day to earn a living, including both employees and owner-drivers, the TWU is uniquely positioned to comment on the impact of speed limits on road safety.

Speed Limits, Travel Times and Driver Behaviour & Safety

The key aspect in which speed limits and travel times affect road safety outcomes in relation to heavy vehicle drivers, which will be the focus of this submission, is in the interaction between speed limits/travel times and drivers' fatigue management. As the NSW Government acknowledges in its 'Towards Zero' road safety campaign, fatigue is one of the three biggest factors in fatal road accidents in NSW, with around 67 deaths and 645 serious injuries occurring in fatigue-related crashes in NSW each year¹.

Under the National Heavy Vehicle Law (NHVL), which NSW has adopted, drivers of heavy vehicles are required to comply with prescribed fatigue management practices. These requirements generally take the form of a limit on the number of hours a driver can be behind the wheel and a mandatory minimum amount of rest time that must be taken over a particular period.

The table below shows the standard work and rest requirements applying to solo drivers of heavy vehicles under the NHVL²:

¹ https://towardszero.nsw.gov.au/sites/default/files/2021-05/RS-FactSheet-Fatigue-TZ-Final_0.pdf

² <https://www.nhvr.gov.au/safety-accreditation-compliance/fatigue-management/work-and-rest-requirements/standard-hours>



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TIME	WORK	REST
<i>In any period of...</i>	<i>A driver must not work for more than a maximum of...</i>	<i>And must have the rest of that period off work with at least a minimum rest break of...</i>
5 ½ hours	5 ¼ hours work time	15 continuous minutes rest time
8 hours	7 ½ hours work time	30 minutes rest time in blocks of 15 continuous minutes
11 hours	10 hours work time	60 minutes rest time in blocks of 15 continuous minutes
24 hours	12 hours work time	7 continuous hours stationary rest time
7 days	72 hours work time	24 continuous hours stationary rest time
14 days	144 hours work time	2 x night rest breaks and 2 x night rest breaks taken on consecutive days

For certain heavy vehicle operators who operate using Basic Fatigue Management (BFM) or Advanced Fatigue Management (AFM) requirements, the periods of work/rest time will differ from those in the table above, but the general principle remains the same. Severe penalties apply for breaches of these fatigue management requirements (including fines ranging from \$6,910 to \$17,240 and 3-4 demerit points³). As such, it is imperative for truck drivers, particularly those performing long-distance linehaul work, to be able to plan their journeys well in advance, and specifically to be able to plan when and where they will stop to take their legally required rest breaks.

The need for drivers to thoroughly plan their journeys and rests leaves them extremely susceptible to unplanned disruptions, such as traffic or weather, which can cause their journey to take longer than anticipated. When this occurs, drivers often find themselves in a situation where they do not have sufficient driving time remaining to reach the nearest truck stop/rest area, and are forced to take their rest by pulling over on the side of the road where possible. In some cases where drivers are using roads/highways with inadequate break-down lanes, where pulling over a truck is not possible, it can mean they are left with no option other than to exceed their maximum driving time – which is of course undesirable for the driver and for road users generally. In the course of preparing this submission, the TWU heard from a member who, due to unforeseen delays in his travel time, exceeded his maximum daily working time approximately 20 minutes from returning home, and was therefore unable to complete his journey.

It is in this regard that the use of variable speed limits in particular can be extremely disruptive to heavy vehicle drivers. If a driver is planning their route and calculating where they intend to take their rests on the basis of the usual speed limit for a particular stretch of

³ https://www.nsw.gov.au/sites/default/files/2021-11/Heavy_vehicle_driver_fatigue_offences.pdf



road, only to find once they've begun the journey that the speed limit on that stretch of road has been arbitrarily reduced, their journey planning is thrown into chaos and they will often find themselves with insufficient driving time to reach the truck stop or rest area they were intending to use.

It is the TWU's recommendation to the Inquiry that further attention and investigation be given to the ways in which variable speed limits affect the route planning and fatigue management of heavy vehicle drivers. While the increased use of variable message signs across NSW does provide some information in the form of estimated travel time to particular destinations, due to the differences in travel times for heavy vehicles compared to cars, this information is not always useful for heavy vehicle drivers.

Options the Committee could consider include the communication of changes in variable speed limits through CB radio and/or other channels. Consideration could also be given to the creation of an online/app database of all variable speed limit zones in NSW, where users can login and check in real-time what the active speed limit is in a particular variable speed limit zone, and/or set their device to receive notifications of a change to the speed limit in a particular zone.

Availability of Suitable Rest Areas

While not explicitly canvassed in the Inquiry's terms of reference, the availability of suitable truck stops and rest areas for heavy vehicles is unquestionably a relevant consideration for the Committee in the context of this Inquiry. As was outlined above, the availability of suitable locations for heavy vehicle drivers to take their legally-required rest times (or lack thereof) can exacerbate the challenges they already face in planning their routes. In order for the road safety goals of the fatigue management laws to be fully realised, it is essential for drivers to have access to an abundance of suitable rest locations.

The lack of suitable rest areas for heavy vehicles has been an issue of significant concern for the TWU for some time. Between June and September 2020, the TWU conducted a comprehensive inspection of dozens of heavy vehicle rest areas along major freight routes in NSW, as well as a survey of heavy vehicle drivers (including members and non-members of the TWU) about their experiences using heavy vehicle rest areas. A copy of the full report prepared as part of this project is included as an Appendix to this submission, however the key findings are included below.

Key Findings of TWU Inspection & Survey Regarding Heavy Vehicle Rest Areas

- Only 22% of rest areas structurally separated light vehicles from heavy vehicles, affecting the availability of parking spaces for heavy vehicles
- Noisy freight (e.g. livestock and refrigeration) rarely being separated from regular freight, affecting the ability of other heavy vehicle drivers to use their sleeper cabs
- A generally poor standard of bathroom facilities, including inadequate cleaning/maintenance and no sanitary bins/sharps disposals
- 89% of heavy vehicle rest areas not having drinking water available
- Just 31% of heavy vehicle rest areas featuring adequate lighting after-dark



The majority of drivers rated the overall quality of heavy vehicle rest areas as poor (39%) or very poor (18.5%). Only 11% of drivers rated the quality as good or very good. More concerningly, over 62% of drivers reported sometimes/often/always being unable to rest properly at heavy vehicle rest areas due to bright lights and 82% because of loud noises. The impact of this on heavy vehicle drivers' ability to take their required rests is clear, with feedback from drivers including:

- *"I'm unable to rest properly on long routes"*
- *"Makes you keep driving ... and that isn't fair. We deserve places to stop, rest, wash and go to the toilet."*
- *"On such large distances sometimes us humans need a break, that's all, somewhere to stop"*

The overwhelming majority of drivers surveyed (more than 87%) reported having to keep driving past a heavy vehicle rest area at least 'sometimes' or more often, due to there not being enough parking spots available. It was common for drivers to provide feedback that parking spaces intended for heavy vehicles being used by regular vehicles, with one survey respondent saying *"parking areas being filled with car/caravan/boats limited spaces causes you to either keep driving putting you over your driving hours or having to pull up on the slip lanes on exit ramps."*

The attitudes of drivers towards the availability of heavy vehicle rest areas was overwhelming low, with more than 94% of drivers reporting there are not currently enough heavy vehicle rest areas across the NSW network. This has a concerning impact on drivers' ability to properly manage their fatigue, with one driver commenting that *"I feel heavily fatigued, frustrated, tense and uneasy. I lose focus and make desperate decisions. I travel Sydney to Canberra 4 times a week in a heavy vehicle, the lack of truck parking amenities in the 'truck stops' is severely frustrating."* Another driver made the obvious but poignant observation that it is *"hard to stick to fatigue management rules if available stops are too far apart."*

Implications of Inadequate Rest Areas on Speed Limits and Road Safety

The inadequate number and quality of heavy vehicle rest areas demonstrated through the inspection and survey results above has clear impacts on speed limits and road safety. As was outlined earlier in the submission, the relative infrequency of suitable heavy vehicle rest areas along a driver's route makes them less able to respond to unexpected delays in their travel time (including delays caused by variable speed limits), which can cause them to exceed their maximum driving hours under fatigue management laws. However, the same can also be true in reverse. If a driver approaches a heavy vehicle rest area, only to find that there are no suitable parking spaces available, or that the facilities are in such a poor condition, the significant penalties attached to fatigue management offences creates a perverse incentive for drivers to speed in order to reach the next heavy vehicle rest area within their permitted work hours.

Furthermore, the survey conducted by the TWU suggested that the Heavy Vehicle Map provided on the Transport for NSW website frequently contained inaccurate information about the suitability of certain rest areas for heavy vehicles, with numerous drivers



responding to the survey with stories of arriving at a rest area shown on the map as being heavy-vehicle friendly, only to find no heavy vehicle parking at all. It is also clear that the existing enforcement of heavy-vehicle-only parking spaces at rest areas is woefully inadequate. Almost 75% of drivers surveyed reported seeing light vehicles using dedicated heavy vehicle parking spaces at rest areas 'often' or 'always.'

The TWU is aware of recent media reports of a review of heavy vehicle rest areas being conducted by Transport for NSW⁴, however on the information available this review appears to have a fairly narrow focus on the use of technology such as the Heavy Vehicle Rest Area Map and real-time signage. While both of these are worthwhile endeavours, it is the TWU's recommendation to the Committee that a more comprehensive statewide strategy for heavy vehicle rest areas is required. Such a strategy should be formulated in consultation with industry – including heavy vehicle drivers themselves, not just their employers – and must address the following matters:

- The volume of heavy vehicle traffic and the available number of suitable heavy vehicle rest areas
- Opportunities for new heavy vehicle rest areas to be developed where gaps exist
- How additional heavy vehicle rest areas will be constructed and who will be responsible for their maintenance
- How issues with cleaning/maintenance of existing heavy vehicle rest areas can be addressed
- How heavy vehicle rest areas are communicated to heavy vehicle drivers
- The use of heavy vehicle rest areas by light vehicles

Conclusion

In summary, it is vital that the ability of heavy vehicle drivers to go about their work – including their ability to comply with their fatigue management requirements – is at the forefront of decision-making regarding speed limits and travel times in NSW. In particular, greater consideration must be given to the impact of changes in variable speed limits to heavy vehicle drivers' ability to effectively plan their routes and when they will take their rest breaks, which is essential to achieve the road safety outcomes the NHVL sets out to.

Furthermore, the insufficient number and quality of heavy vehicle rest areas undermines the ability of drivers to properly manage their fatigue as required, and in some cases can create a perverse incentive for drivers to speed and/or drive unsafely in order to reach a suitable rest area before running out of work hours. A comprehensive strategy to address shortcomings in the existing network of heavy vehicle rest areas is urgently required, as the current situation is manifestly unsuitable for heavy vehicle drivers and falls short of what is required to achieve the maximum road safety outcomes.

⁴ <https://bigrigs.com.au/index.php/2022/02/03/have-your-say-on-how-to-improve-truckies-rest-areas-in-nsw/>



Heavy Vehicle Rest Areas in NSW

30 November 2020

The Transport Workers' Union of New South Wales

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Introduction

Context

Fatigue contributed to at least 9% of all heavy vehicle crashes in NSW in 2018, and 18.3% of all crashes where someone died.¹ Fatigue management should be a key priority for work health and safety regulators, trade unions and employers seeking to reduce the number of work related deaths on NSW roads.

Fatigue at work is the outcome of mental and/or physical exhaustion that reduces a worker's ability to perform their duties safely and effectively.² Fatigue is caused by many factors, as detailed in Figure 1.

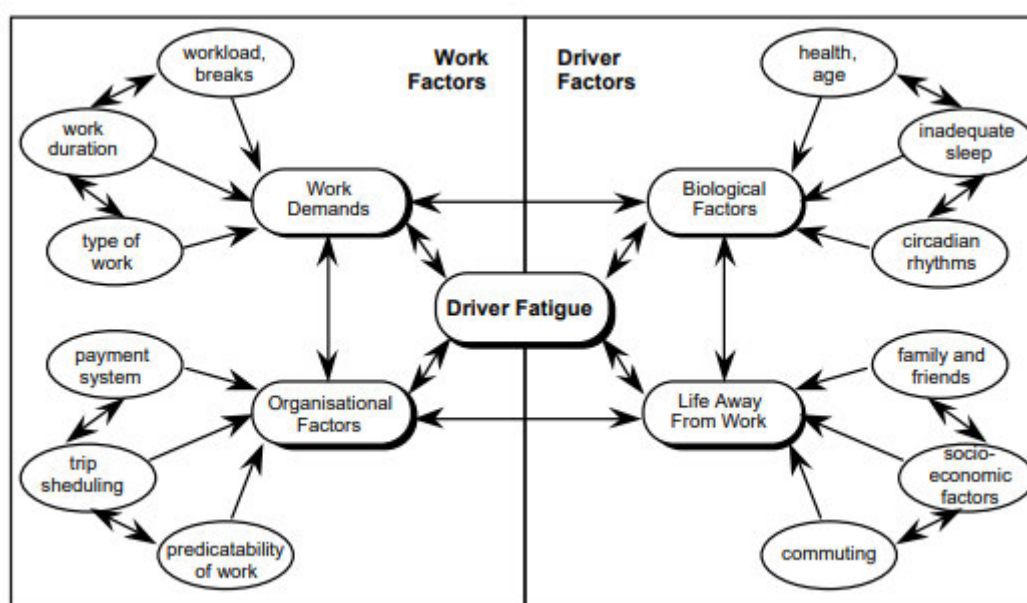


Figure 1: Factors contributing to driver fatigue.³

Fatigue is not 'sleepiness'. While drivers often experience them together, fatigue may exist without the desire to sleep. In these situations, fatigue should be managed by changes to work patterns or duties. When a worker *is* sleepy and fatigued – the only safe remedy is for them is to rest and/or sleep.

The Heavy Vehicle Driver Fatigue Project⁴ recently reported that the greatest risk of drowsiness occurs with:

- Long driving hours
- Driving at night

¹ Transport for NSW, 'Interactive Crash Statistics', Centre for Road Safety, 5 November 2018, Accessed 30 April 2020, '<https://roadsafety.transport.nsw.gov.au/statistics/interactivecrashstats/>'.

² Safe Work Australia, 'Fatigue', Accessed 30 April 2020, '<http://www.safeworkaustralia.gov.au/fatigue>'.

³ Fatigue Expert Group, 'Options for Regulatory Approach to Fatigue in Drivers of Heavy Vehicles in Australia and New Zealand', National Road Transport Commission, 2001.

⁴ Cooperative Research Centre for Alertness, Safety and Productivity, 'Heavy Vehicle Driver Fatigue Project', National Transport Commission, 2019.

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- Shift work (specifically early shifts, night shifts and backwards shift rotations)
- Long shift sequences
- Shift sequences where a shorter break allows for less sleep

The nature of work in the road freight industry, which often includes all of these at-risk factors, puts workers at significant risk of fatigue and sleepiness while performing their duties. Workers must be able to rest well while working and between work shifts.

Roads and Maritime Services (RMS) helps workers and transport operators manage fatigue by providing HVRA on the road network (Figure 2). There are X HVRA in NSW on X key freight routes.

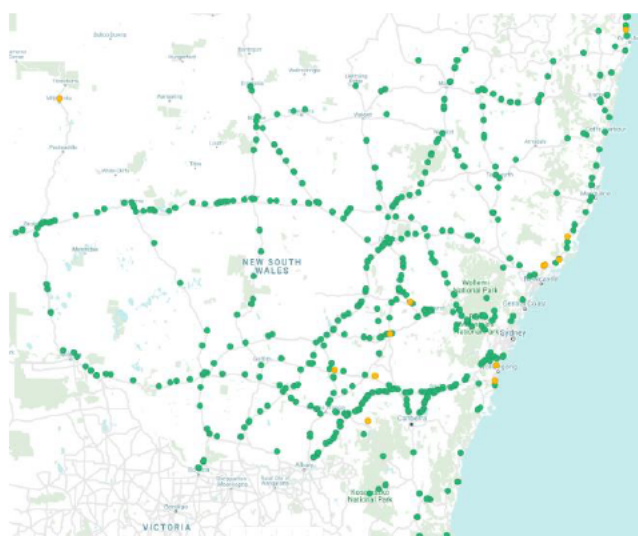


Figure 2: Location of HVRAs in NSW, as viewed on the RMS HVRA Map⁵

Types of HVRAs

There are six classifications of HVRA used by Austroads in the Guidelines for the Provision of Heavy Vehicle Rest Area Facilities,⁶ which are equivalent to four classifications used by Roads and Maritime Services in the NSW jurisdiction (Table 1). Concept drawings of each Austroads classification are provided in Appendix 1 to assist interpreting these categories.

Table 1. Classification of HVRA in NSW

Roads and Maritime Services	Austroads
Major HVRA	Class 1 HVRA
	Class 2 HVRA
Minor HVRA	Class 3 HVRA
	Class 4 HVRA
Truck Parking Bays	Class 5 HVRA
Truck informal HVRA	Informal HVRA

⁵ Roads and Maritime Services, *Heavy Vehicle Rest Area Map*.

⁶ Austroads, *Guidelines for the Provision of Heavy Vehicle Rest Area Facilities* (Research Report No AP-R591-19, July 2019), 5.

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Formal HVRA are provided and/or maintained by RMS, whereas informal HVRA have evolved through obvious signs of use by heavy vehicles. RMS does not always maintain informal HVRA.

HVRA have a number of features and facilities to help drivers rest. The most basic requirement is for a heavy vehicle to safely enter and park somewhere. However, some HVRA also include bathrooms, shade, rubbish bins, the separation of vehicle types, security lighting and water. Austroads recommends different facilities and key safety features for each class of HVRA the RMS provides. Table 2 outlines some of these recommended facilities and when RMS should provide them.

Table 2: Adapted from Table 4.1 in the Austroad Guidelines for the provision of heavy vehicle res area facilities. Green indicates that a feature is required, yellow indicates that a feature should be provided where practicable, and blue indicates a feature that is optional.

Criteria	Facilities/features		HVRA Classification				
			1	2	3	4	5
Key safety features	Demand-based spacing	Time (mins)	60	60	30	30	15
		Distance (km)	70-100	70-100	35-50	35-50	15-25
	Safe vehicle movement and access		Green	Green	Green	Green	Green
	Capacity – present and forecast		20 +	15-20	10-15	5-10	5 +
	Separation of light and heavy vehicles		Green	Green	Yellow	Blue	Blue
	Separation of vehicles carrying noisy freight		Green	Yellow	Blue	Blue	Blue
	Separation for long-term/short-term visitors		Green	Yellow	Blue	Blue	Blue
	Unidirectional flow		Green	Green	Green	Green	Yellow
	No reversing movements		Green	Green	Green	Green	Green
	Security		Green	Green	Green	Green	Green
	Pedestrian safety and access		Green	Green	Green	Green	Green
	Signage on approach and within the HVRA		Green	Green	Green	Green	Green
Amenities	All-weather seal		Green	Green	Green	Yellow	Blue
	Tables/benches		Yellow	Yellow	Yellow	Yellow	Blue
	Natural shade		Green	Green	Green	Green	Yellow
	Shelter		Yellow	Yellow	Yellow	Yellow	Yellow
	Rubbish bins		Yellow	Yellow	Yellow	Blue	Blue
	Lighting		Yellow	Yellow	Yellow	Blue	Blue
	Toilets		Green	Yellow	Yellow	Yellow	Blue
	Water		Yellow	Yellow	Blue	Blue	Blue
	Visitor information board		Yellow	Yellow	Blue	Blue	Blue
	Managed livestock effluent disposal sites		Yellow	Yellow	Yellow	Yellow	Yellow

The RMS HVRA Map

RMS provides an online HVVRA Map that drivers and workers can access to help plan their use of HVRA. The Map does not inform drivers which category a particular HVRA belongs to, but does indicate some of the broadly available facilities at each HVRA (Figure 3).

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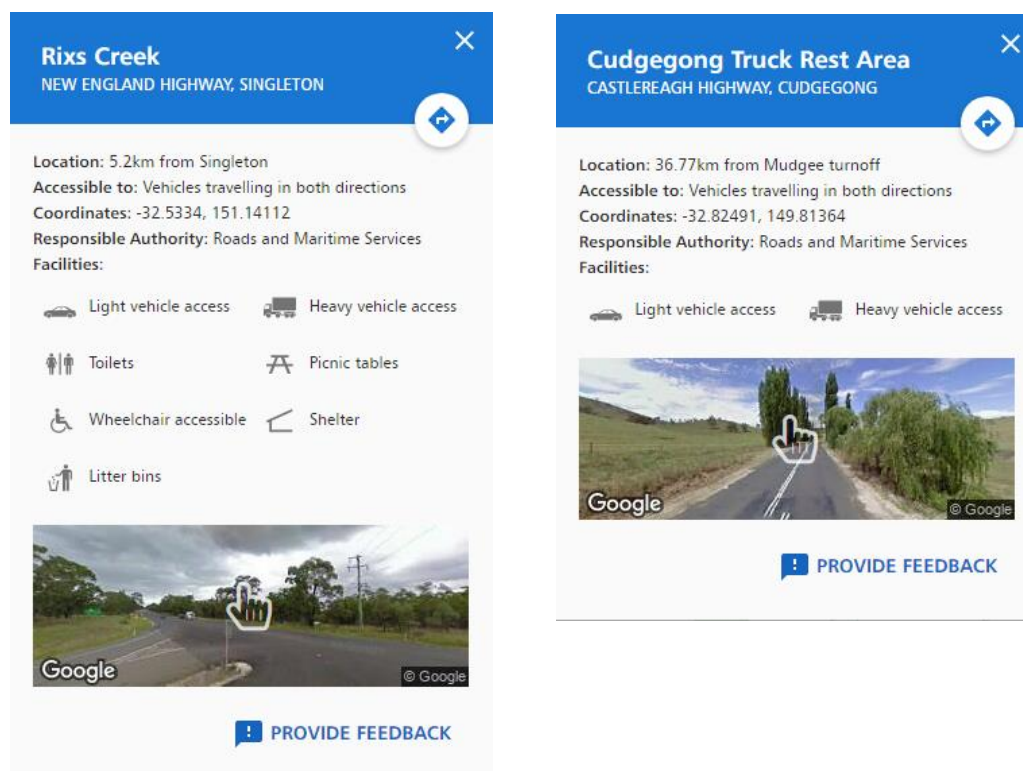


Figure 3: Examples of the type of details in the RMS HVRA Map.

The Regulation of HVRAs

NSW Government HVRA Strategy

In 2010, the RTA published a strategy for major heavy vehicle rest areas on key rural freight routes.⁷ The objectives of this strategy are to:

- Address the need for heavy vehicle drivers to take rest breaks
- Develop a network of major HVRAs with required amenities
- Assist heavy vehicle drivers to comply with fatigue legislation, and
- Reduce the proportion of road accidents in NSW involving heavy vehicles.⁸

The strategy reported upgrades to specific HVRAs necessary to achieve these goals, and identified where RMS should build new HVRA to fill gaps in the network. This strategy is now over a decade old and is no longer reflects the needs of the NSW HVRA Network. The intention has long been to replace the strategy with an updated one.

The NSW Government has been developing an updated HVRA strategy since at least October 2015.⁹ This process has included publishing issues papers and

⁷ Roads and Traffic Authority, *RTA Strategy for Major Heavy Vehicle Rest Areas on Key Rural Freight Routes in NSW* (January 2010).

⁸ Ibid 2.

⁹ Roads and Maritime, *Road Freight Industry Council* (Agenda, 8 December 2015), 7.

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consulting with industry actors, for example through the Road Freight Industry Council (RFIC). The NSW Government has also committed to developing a HVRA strategy as part of the Freight and Ports Plan.¹⁰ Despite these commitments, the last time the RFIC discussed this strategy was in April 2018¹¹, and there is currently no date of expected completion nor any indication that it is an active priority of RMS and the NSW Government.

This gap in regulation is a serious problem for the health and safety of workers in the road transport industry and an issue of significant concern that hinders the proper management of fatigue.

Work Health and Safety Legislation

HVRAs are crucial to the safety of drivers, and the Government should strategically plan and maintain them. However, the PCBU ultimately holds the primary duty of care to their workers, and it is their responsibility to ensure that adequate and safe rest opportunities are available for each worker while they are at work, regardless of whether or not the RMS has ensured the provision of these rest opportunities.

No strategy overrides the requirement of the person conducting a business or undertaking (PCBU) to comply with the *Work Health and Safety Act (2011)* to provide:

- A work environment without risks to health and safety¹², and
- Adequate facilities for the welfare of workers while at work¹³.

¹⁰ Transport for NSW, *NSW Freight and Ports Plan 2018-2023* (September 2018), 10.

¹¹ Roads and Maritime, Road Freight Industry Council (Agenda, 5 April 2018), 6.5.

¹² *Work Health and Safety Act 2011* (NSW) s 19(3)(a)

¹³ *Ibid* s 19(3)(e)

TWU HVRA Research

Research Context

The provision of adequate heavy vehicle rest areas (HVRA) is crucial to ensuring the health and safety of workers in the NSW freight task. This research was designed to explore the condition of the current HVRA network and the impact of these conditions on transport workers in NSW.

Research Objectives

We aimed to measure:

- The condition of HVRA and the adequacy of their key safety features and amenities
- The attitudes of heavy vehicle drivers towards the current HVRA network and the impact of the HVRA network on the health and safety of heavy vehicle drivers

Research Methodology

Inspection of HVRA

Between the 8 June and 3 September 2020 we inspected HVRA along major freight routes in NSW. These routes included:

- Hume Highway
- Pacific Highway
- Great Western Highway
- Castlereagh Highway
- Mitchell Highway
- Sturt Highway
- Newell Highway
- Federal Highway
- Princes Highway

We assessed the availability of key safety features and conditions of included amenities. The checklist used to guide these assessments is provided in Appendix 2 and was based on Austroads's Guidelines for the Provision of Heavy Vehicle Rest Area Facilities (Table 2). We collected photographs, video recordings and audio recordings from each HVRA assessed.

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Survey of HVRA users

Between the 8 June and 3 September 2020, we distributed paper surveys to heavy vehicle drivers that use HVRA while working. We also distributed the survey online by email and social media to members and non-members. A copy of the survey instrument is provided in Appendix 3.

Study Population

269 workers were surveyed as part of this study. The median age of the participants was 52. 87.45% were TWU members, 96.44% were male and 3.56% were female. 12.40% were owner-drivers and 87.60% were employee drivers.

172 HVRA were included as part of this study. 121 of these were assessed using the inspection instrument, with the remaining 51 HVRA either inaccessible, unable to be located, or otherwise not assessed. 30 HVRA were assessed on the Hume Highway, 11 on the Pacific Highway, 8 on the Sturt Highway, 7 each on the Great Western Highway, Castlereagh Highway, Newell Highway and the Federal Highway, and the remaining 44 on other roads in the Eastern half of NSW.

Results

The condition of HVRA

We assessed the condition of the HVRA network using an inspection checklist. A summary of the data collected is presented in Table 3.

Table 3: The key safety features and amenities assessed on inspection of HVRA, and the proportion of HVRA inspected that contained the feature.

Criteria	#	Facilities/features	%
Key safety features	1	Safe vehicle access to the area	85
	2	Clean area*	55
	3	Available heavy vehicle parking*	100
	4	Separation of light and heavy vehicles	22
	5	Light vehicles in heavy vehicle parking places*	12
	6	Light vehicles with equipment set up in parking places*	4
	7	Separation of noisy and quiet vehicles	11
	8	Separation of long-term and short-term visitors	22
	9	Unidirectional traffic flow	80
	10	Truck cabins face away from road	40
	11	Security features of any kind	13
	12	Safe pedestrian management	22
	13	Signage	58
	14	Well defined parking places	23
Amenities / extras	1	Sealed pavements	81
	2	Well maintained table and benches	51
	3	Shelter available	43

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	4	Well maintained rubbish bins	73
	5	Adequate lighting	31
	6	Well maintained toilets	35
	7	Available drinking water	11
	8	Visitor information board	21

* When inspected

The proportion of available key safety features and amenities varied depending on the highway. A breakdown of the data presented in Table 3 by the Highways with the greatest number of inspected HVRA is presented in Table 4.

Table 4: The proportion of available features at HVRA on different roads in NSW.

Criteria	#	%								
		Hume N=30	Pacific N=11	Sturt N=8	Great Western N=7	Castlereagh N=7	Newell N=7	Federal N=7	Princes N=6	Mitchell N=5
Key safety features	1	80	91	100	71	86	100	86	83	80
	2	30	91	0	29	100	71	71	83	20
	3	100	100	100	100	100	100	100	100	100
	4	23	82	0	0	0	14	0	17	0
	5	3	18	0	0	0	0	14	17	20
	6	0	9	0	0	0	0	0	17	0
	7	7	55	0	0	0	0	0	0	0
	8	23	73	0	0	0	29	0	17	0
	9	100	100	88	86	71	57	86	100	80
	10	30	73	0	14	43	71	0	33	0
	11	10	27	0	0	29	14	0	0	0
	12	33	91	0	14	29	14	0	50	0
	13	43	82	13	29	100	86	86	83	0
	14	23	82	0	0	0	14	0	50	0
Amenities	1	90	100	100	100	71	100	71	83	80
	2	30	100	25	43	86	100	43	83	40
	3	30	100	25	29	29	86	0	83	20
	4	77	100	75	57	86	86	29	83	80
	5	23	100	0	29	29	29	0	50	20
	6	23	55	0	29	57	71	14	67	20
	7	10	27	0	14	14	14	0	0	0
	8	20	45	0	14	29	14	0	17	0

Key Safety Features

Vehicle and pedestrian movement

The majority of HVRA inspected were accessible to heavy vehicles. This is likely an overrepresentation of the true proportion of HVRA that heavy vehicles can safely

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access, as a number of rest areas not suitable for heavy vehicle access were not inspected, for example informal rest areas and parking bays on the side of highways. Less than a quarter of HVRA had safe pedestrian management systems in place.

Capacity and parking availability

All HVRA inspected had parking available for heavy vehicles. However, the availability of parking depends greatly on the time of day, week and year. Our research was conducted primarily during non-peak times and in the context of the Covid-19 pandemic. These findings likely under represent the availability of parking on the network during peak times.

Separation of vehicle types

Light and heavy vehicles were structurally separated in only 22% of inspected HVRA. In these HVRA we still observed light vehicles (often with caravans or trailers attached) using dedicated heavy vehicle parking places 12% of the time (Figure 4). The most common arrangement was no structural separation of light and heavy vehicles, with trucks and cars freely parking next to each other (Figures 5 and 6)



Figure 4: Twelve Mile Creek Rest Area, Pacific Highway



Figure 5: Hawkesbury Rest Area NB, Sydney-Newcastle Freeway



Figure 6: Yamminba Rest Area, Newell Highway

The separation of noisy freight (livestock, refrigeration) from regular freight was rarely observed across the network. At most of the HVRA inspected, heavy vehicles of all types freely parked alongside one another. Some HVRA obtained clearly marked areas to separate noisy freight, though this was not often the case.

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Figure 7: Nambucca Heads Service Centre, Pacific Highway

Security

Only 13% of HVRA inspected had security features of any kind, including CCTV or security staff.

Signage

Signage of HVRA varied across the network. Just over half had adequate signage on approach. Few HVRA had a sign within the area that indicated the name and location of the rest area.

Amenities

Toilets

The bathroom facilities available to heavy vehicle drivers varied considerably across the network. HVRA with bathroom facilities were often poorly maintained, had no soap, no hand drying facilities, no sanitary bins or sharps disposal containers and smelt strongly of urine and faeces.



Figure 8: Gowan Rest Area S/B, Newell Highway



Figure 9: Branxton Truck Rest Area, Hunter Expressway

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Figure 10: Wattaka Rest Areas,
Hunter Expressway

We observed evidence that drivers often resort to leaving faeces, urine and toilet paper on the ground at HVRAs where facilities are not provided (or where they are in poor condition), and also on the ground between HVRAs where there is nowhere else to go.



Figure 11: Wyong Service Centre N/B,
Sydney-Newcastle Freeway



Figure 12: Eleven Mile Drive

We observed a lack of appropriate sanitary bins in current bathrooms and a lack of dedicated female bathrooms across the network, despite a growing number of female transport workers.

Water

Only 11% of HVRA provided drinking water. Rainwater tanks were commonly used across the network, but these were often empty and unable to be used.

Rubbish bins

A large proportion of HVRAs contained rubbish bins and places to leave rubbish, however these were often observed full, or unused.

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Figure 13: Greenwood Grange,
Kamilaroi Highway



Figure 14: Oxley Highway

We observed discarded used needles at a number of HVRA locations. This was not considered directly by the inspection checklist, but presents an obvious risk to the health and safety of workers.

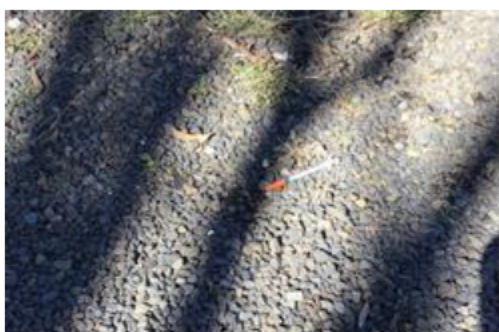


Figure 15: Larras Lee, Mitchell Highway

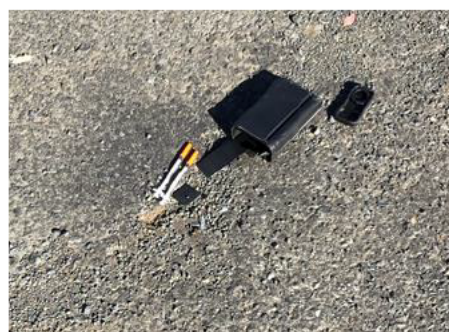


Figure 16: Two Mile Creek,
Mitchell Highway

Lighting, tables, benches, shade and shelter

Adequate lighting was available at only 31% of HVRA. Half of inspected HVRA had well maintained tables and benches. These were often the only source of shade available to drivers at locations where there was a limited amount of trees.

The attitude workers and the impact on drivers

“I’m unable to rest properly on long routes”

“I have to work my trip out and know when I’m going to stop... It annoys the hell out of me when I can’t stop because it’s full of caravans ... there’s not another rest stop around the corner”

“It causes frustration, anxiety, health issues, stress”

“Makes you keep driving ... and that isn’t fair. We deserve places to stop, rest, wash and go to the toilet.”

“On such large distances sometimes us humans need a break, that’s all, somewhere to stop”

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“We are supposed to be professional drivers, but we have inadequate facilities. Where do our taxes go?”

The majority of drivers rated the overall quality of HVRAs as poor (39.03%) or very poor (18.59%). Only 11.16% of drivers rated the quality as good or very good.

The attitudes of drivers towards the availability of HVRAs was overwhelming low, with 94.42% of drivers reporting there was not currently enough HVRAs across the NSW network.

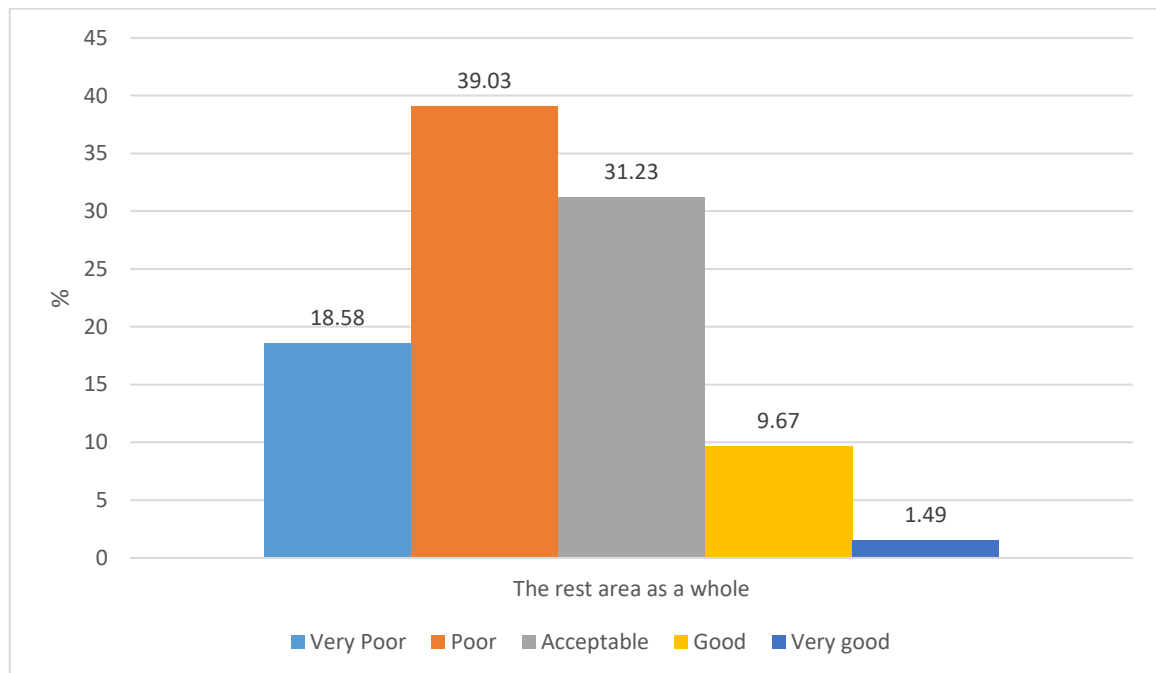


Figure 17: Attitudes of heavy vehicle drivers towards HVRA facilities (Q1a Thinking about the heavy vehicle rest areas you use while working, how would you rate the quality of the rest area as a whole?)

APPENDIX: TWU HEAVY VEHICLE REST AREA INSPECTION & DRIVER SURVEY

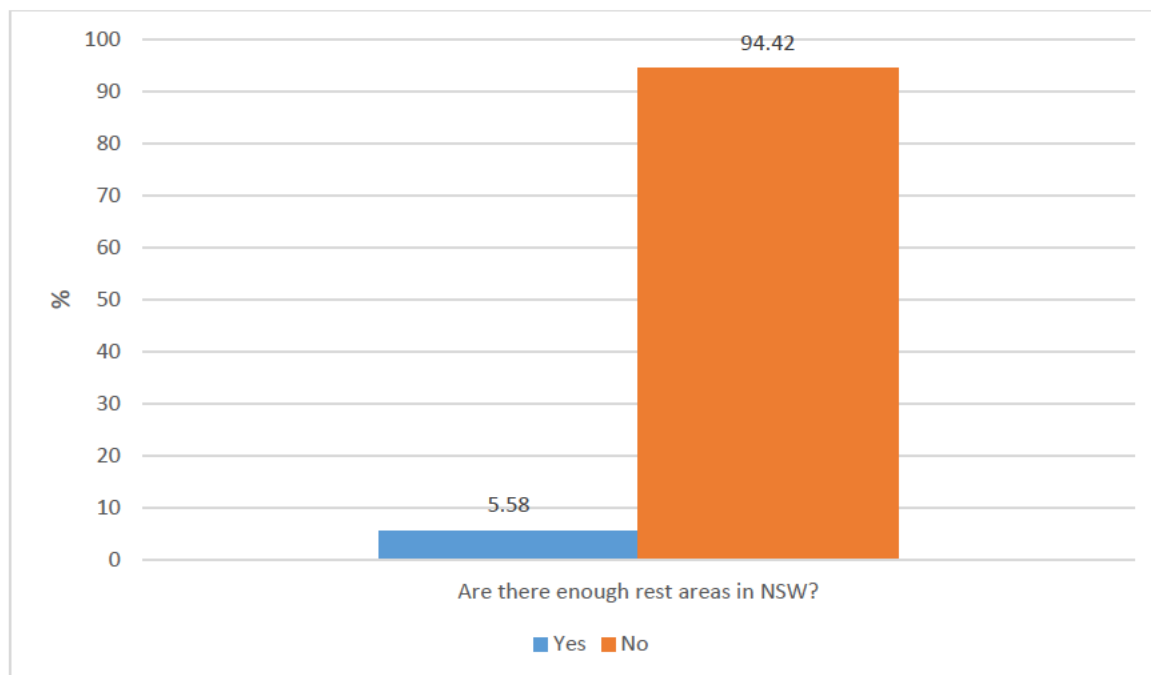


Figure 18: The attitudes of heavy vehicle drivers towards the number of HVRAs (Q3 Do you think there are currently enough heavy vehicle rest areas in NSW?)

When asked to consider the impact of stimuli on their quality of rest, drivers reported that loud sounds often prevent them from sleeping well (36.33%). Only 17.97% of drivers reported this occurring rarely or never. Drivers reported that bright lights had a lesser impact on their ability to rest well, although 41.35% of drivers still reported that they were sometimes unable to rest well because of them.

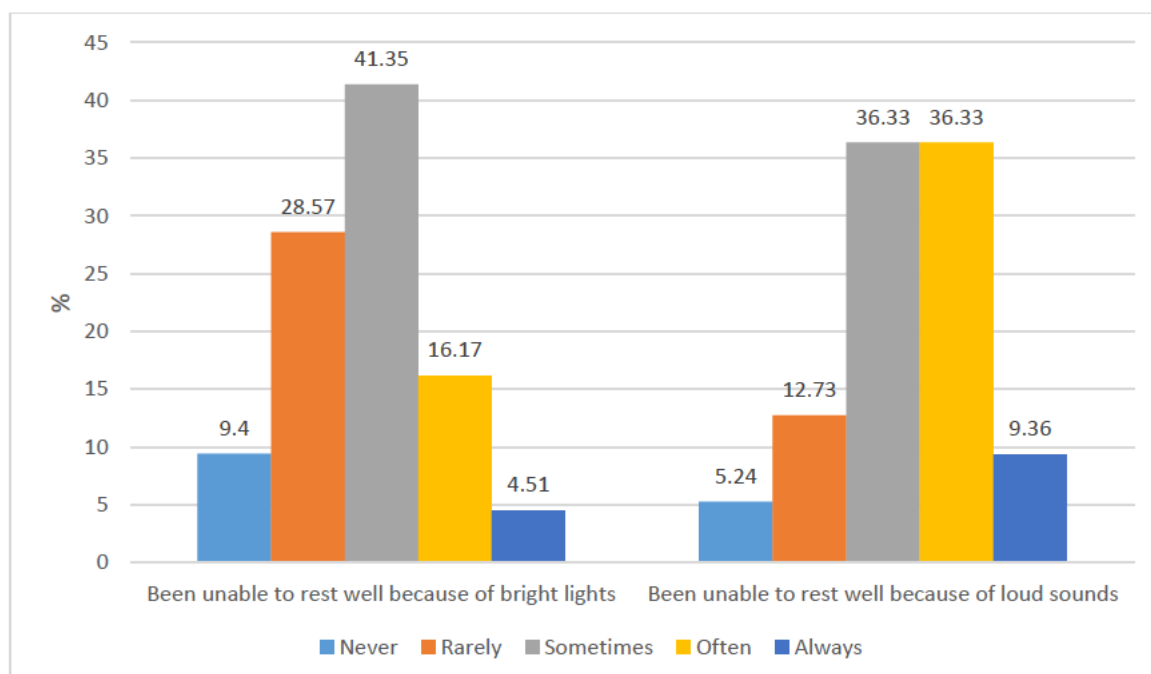


Figure 19: The impact of bright lights on the ability of heavy vehicles drivers to rest well (Q2f-g Thinking about your use of HVRAs in the past 12 months, how often have you been unable to rest well because of (f) loud sounds, or (g) bright lights.)

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The separation of vehicle types

Almost all surveyed drivers reported seeing cars or caravans parked in heavy vehicle places at some point in the past twelve months. A vast majority of drivers said they saw this occurring often (41.64%) or always (33.09%).

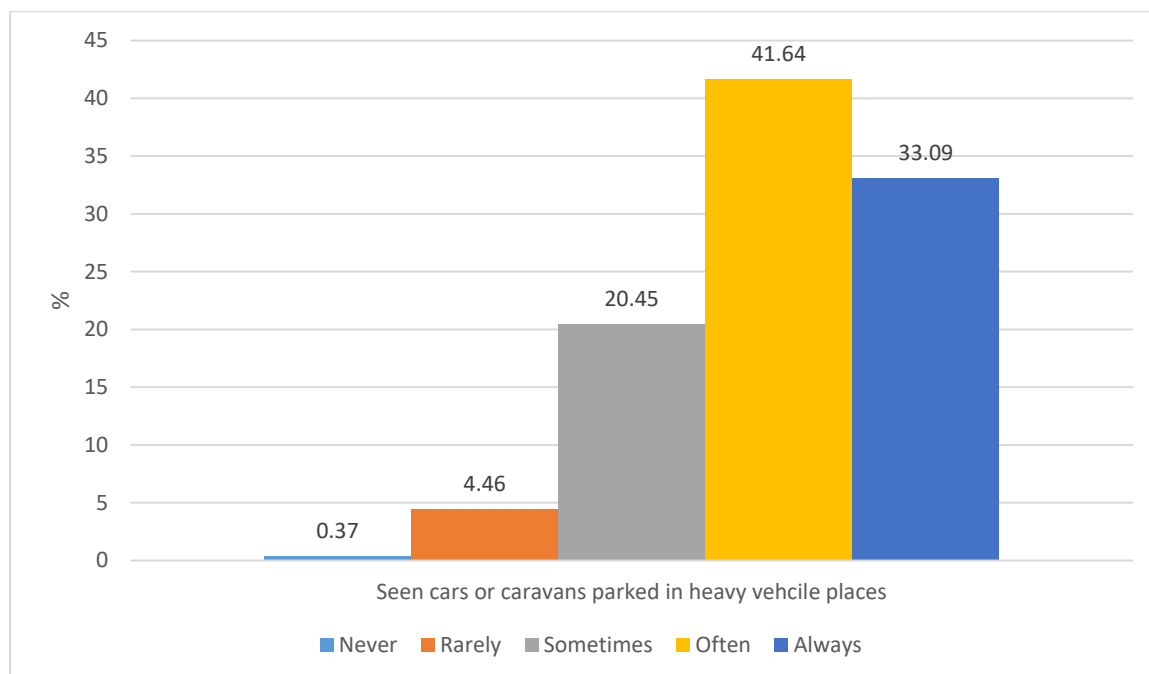


Figure 20: The use of HVRAs by light or heavy vehicles (Q2a Thinking about your use of HVRAs in the past 12 months, how often have you seen cars or caravans parked in heavy vehicle places?)

It is clear that the use of heavy vehicle resting places by light vehicles is not only common, but is a pervasive concern among surveyed heavy vehicle drivers.

“Get rid of caravans out of truck parking bays. A lot of older parking bays were made before B-Doubles came along and there’s just not enough room with them”

“Get the cars out of our area – we’re not in their area”

“Rest areas should be policed during holiday periods when rest areas are taken up by cars and caravans”

“Need more truck only rest areas”

Availability of parking

A majority of drivers (42.75%) are sometimes required to keep driving past HVRAs they wish to use because they cannot find an appropriate place to park. Worryingly, an additional 44.61% of drivers said they had to do this often or always.

Drivers noted the impact this lack of parking has on their wellbeing:

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“I feel heavily fatigued, frustrated, tense and uneasy. I lose focus and make desperate decisions. I travel Sydney to Canberra 4 times a week in a heavy vehicle, the lack of truck parking amenities in the “truck stops” is severely frustrating”

“Hard to stick to fatigue management rules if available stops are too far apart”

“Need more rest areas with adequate heavy vehicle parking”

We observed a belief among heavy vehicle drivers that the use of HVRAs by light vehicles has an impact on the availability of parking:

“With parking areas being filled with car/caravan/boats limited spaces cause you to either keep driving putting you over your D/Hrs or having to pull up on the slip lanes on exit ramps”

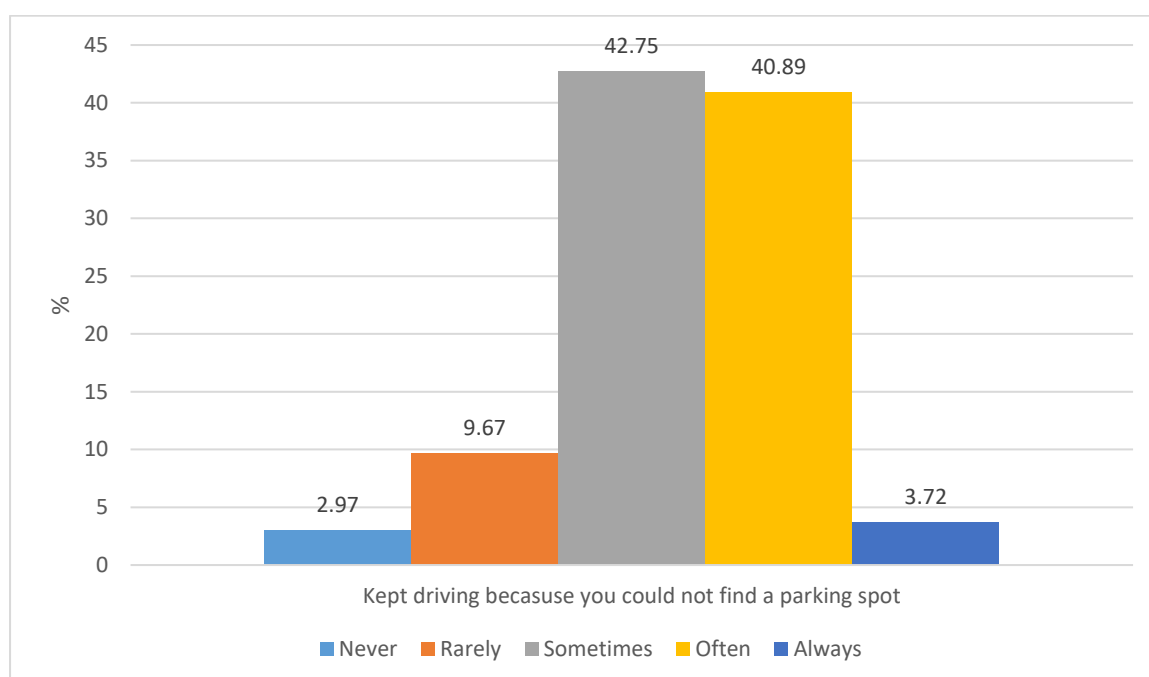


Figure 21: The availability of parking at HVRAs (Q2b Thinking about your use of HVRAs in the past 12 months, how often have you kept driving because you could not find a parking spot?)

Toilet facilities at HVRAs

The vast majority of drivers surveyed rated the quality of HVRAs as poor (42.11%) or very poor (31.58%). Only 11.16% of drivers rated the quality of HVRAs as good or very good. A majority of drivers reported often (51.30%) or always (8.92%) needing to use a bathroom when only inadequate toilet facilities were available.

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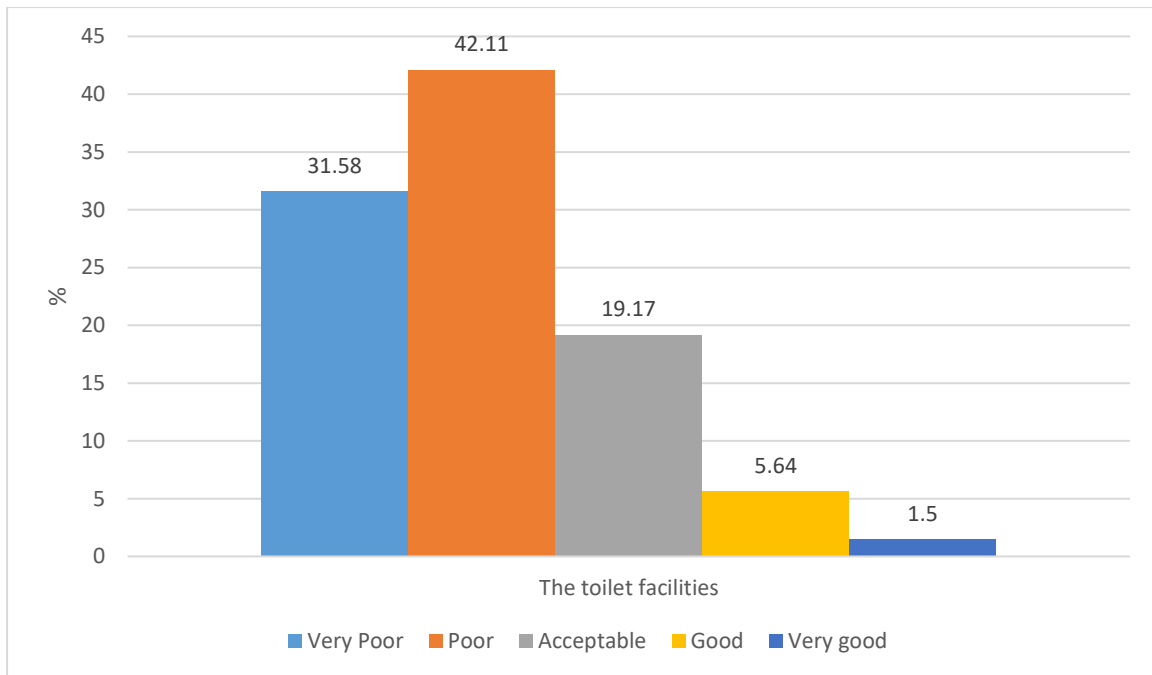


Figure 22: Attitudes of heavy vehicle drivers towards toilet facilities at HVRAs (Q1 Thinking about the heavy vehicle rest areas you use while working, how would you rate the quality of the toilet facilities?)

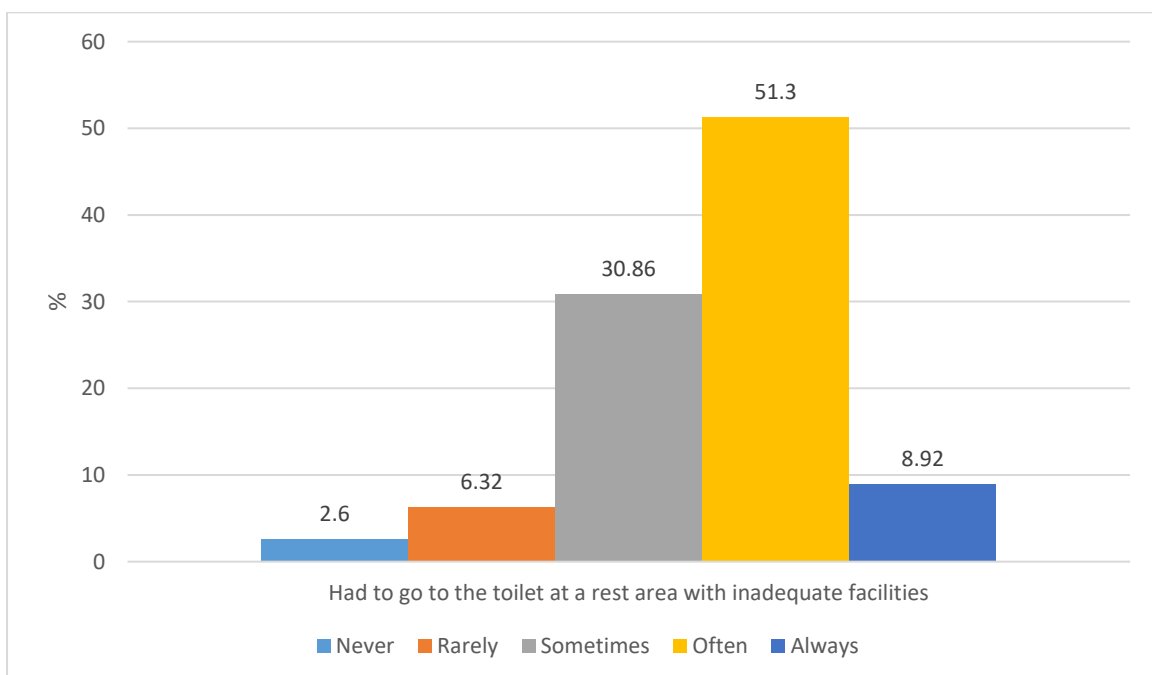


Figure 23: Inadequate toilet facilities at HVRAs (Q2c Thinking about your use of HVRAs in the past 12 months, how often have you had to go to the toilet at a rest area with inadequate facilities?)

Some drivers noted they often tried to avoid using the toilet facilities altogether because of their condition.

“There is nowhere you want to use a toilet”

“I have even had men say to me I am glad I am a bloke I don’t have to touch anything”

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“You are always trying to get to a Service Centre before you have to take your next rest break because they are the only clean places around, if I have to have a rest break in the rest areas along the road, I usually just try and hold on until I can get to decent facilities.”

A majority of drivers surveyed reported always (15.99%) or often (44.61%) being unable to wash their hands after going to the toilet at a HVRA. Only 6.69% of drivers reported always being able to wash their hands.

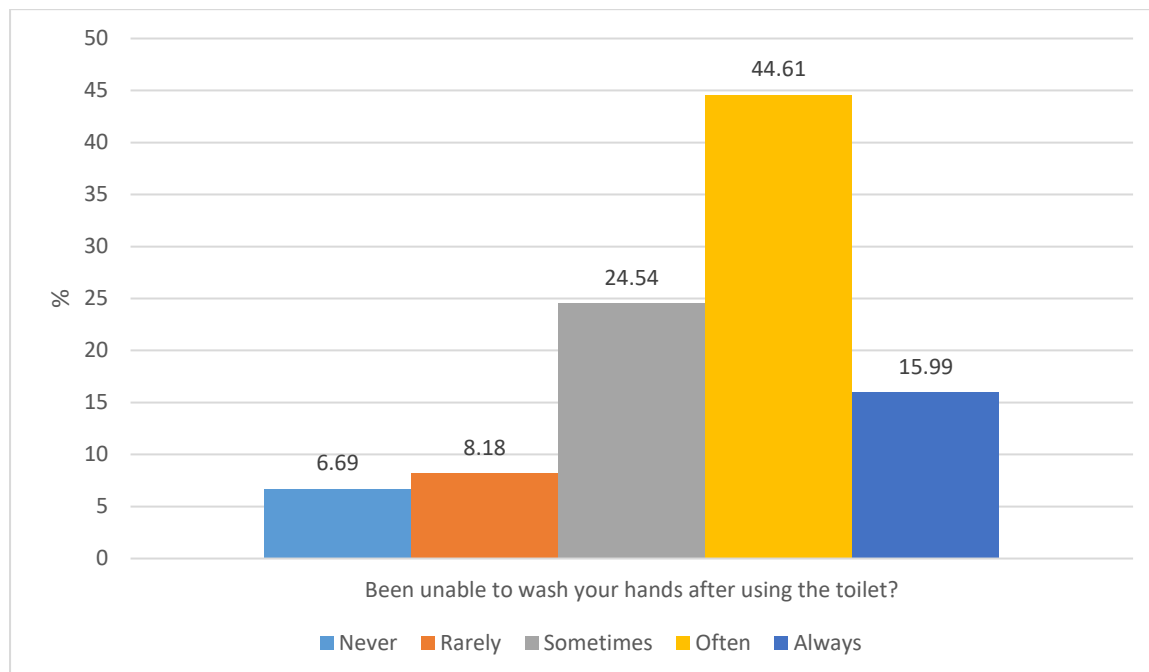


Figure 24: Inadequate hand washing facilities at HVRAs (Q2d Thinking about your use of HVRAs in the past 12 months, how often have you been unable to wash your hands after using the toilet?)

“Sometimes I have to go on the side of the road”

“I won't go into the toilet area to pee as there are usually nowhere to wash hands. I usually find a tree so I don't have to touch anything other than myself.”

“As a female driver unable to go to toilet due to no parking and toilets being locked”

Rubbish bins

44.15% of heavy vehicle drivers reported they sometimes had nowhere to leave their rubbish, and 35.10% reported they often or always had nowhere to leave rubbish.

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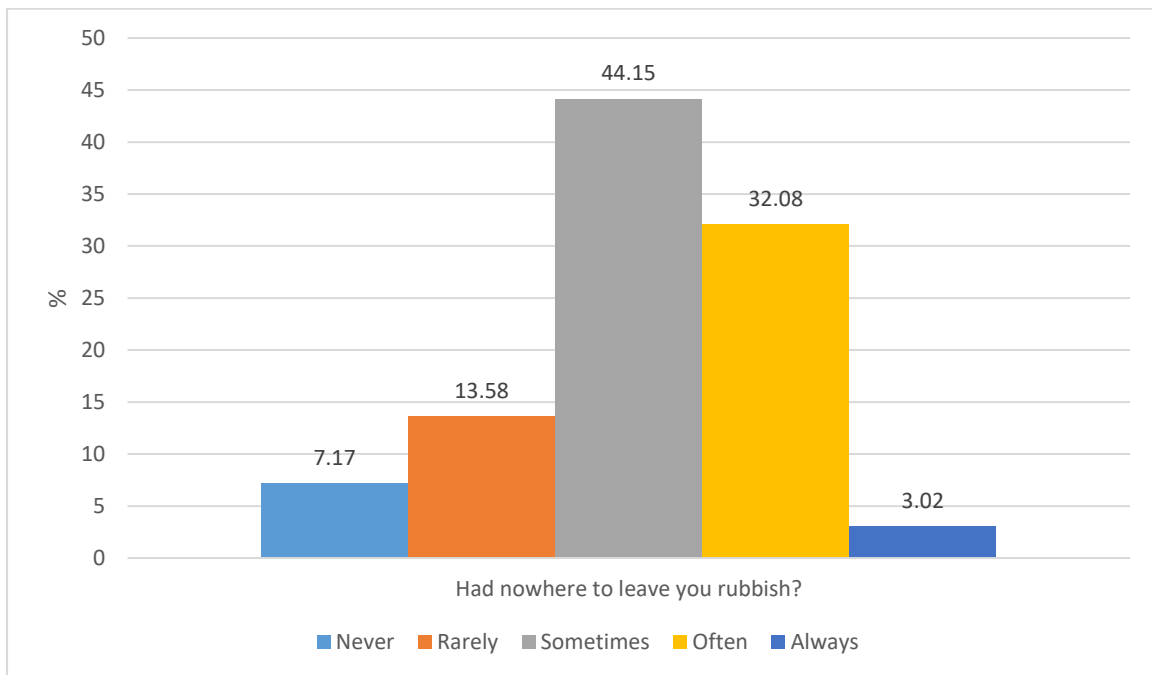


Figure 25: Rubbish at HVRAs. (Q2e Thinking about your use of HVRAs in the past 12 months, how often have you had nowhere to leave your rubbish?)

Drinking Water

Almost half (40.67%) of drivers reported being unable to access drinking water at HVRAs at any point in the last 12 months. 36.57% of drivers reported being unable to do so often.

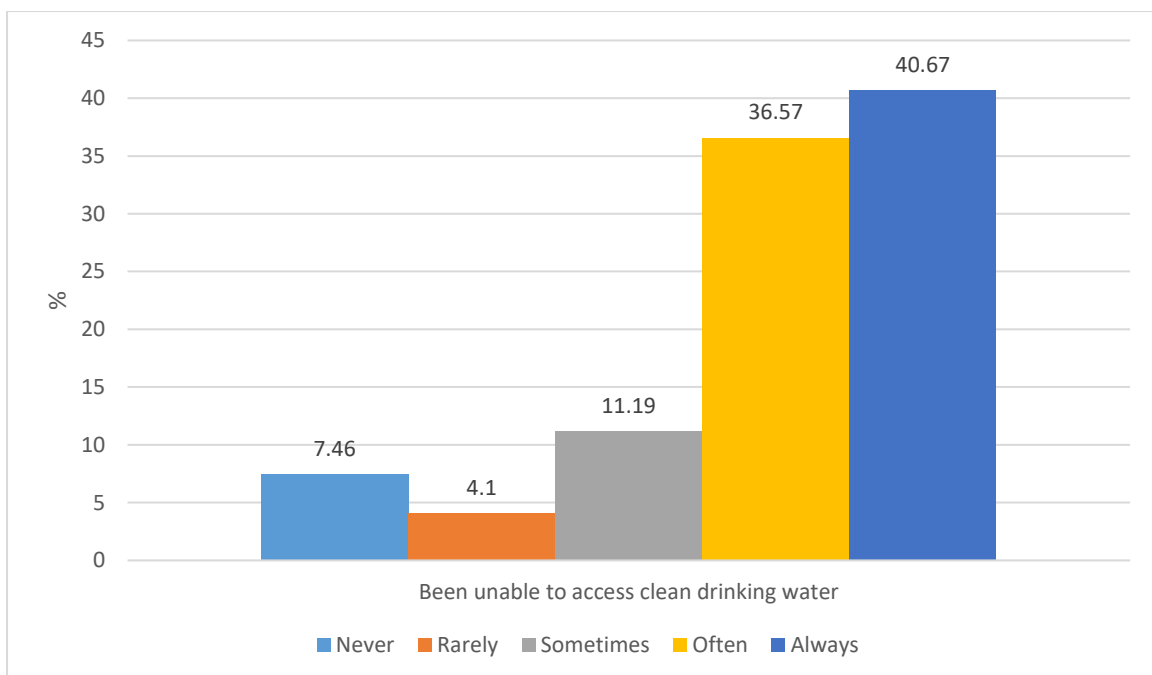


Figure 26: Q2h Thinking about your use of HVRAs in the past 12 months, how often have you been unable to access drinking water?

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Signage

HVRA users expressed a desire for signage to be improved. They accepted a number of HVRA had adequate signage on approach, but there is a lack of identification signs within HVRA that clearly communicate which HVRA the driver is in. Workers regulated by the Heavy Vehicle National Law suggested that this makes the use of fatigue management log books more difficult, and that the name of the HVRA should be clearly stated for all rest areas.

The Need for a HVRA Strategy

Discussion of Results

The results of the research presented herein suggest that the conditions of HVRAs in NSW are inadequate and having a significant impact on the ability for workers to rest well and drive safely.

A qualitative synthesis of the data suggests three categories of HVRA – poor, fair and good (Table 5). These categories are not exclusive, and a HVRA may have good toilet facilities, but poor access (for example). The HVRA inspected often had more than one feature in the same category – for example an area that has a particularly poor facility or safety feature was likely to have other facilities and safety features in that category.

Table 5: Types of HVRA based on the condition of their features and facilities

Feature	HVRA Type 1 – Poor	HVRA Type 2 – Fair	HVRA Type 3 - Good
Access	<p>No signs on approach or within the HVRA</p> <p>Difficulty for heavy vehicles to enter / navigate the HVRA.</p> <p>Usually requires resealing or road maintenance.</p>	<p>Some signage used but often unclear which HVRA you are using.</p> <p>Heavy vehicles can navigate the area but may be poorly planned or</p>	<p>HVRA well signposted on approach and the name of the area is clearly stated.</p> <p>Well planned and easy to navigate.</p>
Parking	<p>No suitable parking, or suitable parking unavailable or taken by light vehicles.</p> <p>No separation of vehicle types.</p>	<p>Suitable parking available.</p> <p>Parking places often taken by light vehicles.</p> <p>Separation of vehicles may exist but is not followed.</p>	<p>Suitable parking available.</p> <p>Light vehicles separated from heavy vehicles.</p> <p>Noisy heavy vehicles separated from other vehicles.</p>
Toilet facilities	<p>None.</p> <p>Often faeces, urine and toilet paper around the perimeter of the HVRA.</p>	<p>Poorly maintained bathroom.</p> <p>Often unclean, lacking soap, water and sanitary bins.</p>	<p>Well maintained bathroom.</p> <p>Usually clean with access to soap, water and sanitary bins.</p>

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		Sometimes faeces, urine and toilet paper around the perimeter of the HVRA.	
Cleanliness	<p>No rubbish bins.</p> <p>Often rubbish left around the HVRA.</p> <p>Discarded waste (food, syringes, faeces, toilet paper) common.</p> <p>Often smells of urine.</p>	<p>Rubbish bins available, but full or poorly maintained.</p> <p>Discarded waste (food, syringes, faeces, toilet paper) common</p>	<p>Rubbish bins available and well maintained.</p> <p>Some waste discarded.</p>

There is currently an unacceptably high number of poor HVRAs, that do not allow workers to rest well. The priority for policy makes should be to ensure that workers are able to use the HVRA network effectively and provide for as many good HVRAs as possible.

Our findings suggest that workers are intentionally avoiding certain HVRA because their facilities are so poor, and driving for longer periods than they otherwise would if the facilities were better, putting their health and safety at unnecessary risk. We also found that workers often refused to use poorly maintained facilities, such as bathrooms, where they are provided but the conditions are unacceptably poor.

We did not consider the Austroads classification of HVRAs in our assessment of the key safety features and amenities. This is primarily because RMS does not make these classifications available, and there is no way for a worker to determine what category of HVRA an area belongs to using the HVRA Map.

While we appreciate the need for a varied supply of rest facilities across the state, there is an obvious problem with how RMS communicates information about the HVRA network to workers to assist them in their trip planning. RMS and Austroads do not have a plan to resolve this issue.

Drivers noted a dissatisfaction with the RMS HVRA Map, the only tool currently available to assist workers plan which HVRA to use. Specifically, workers suggested that it lists a number of rest areas as HVRAs that are not suitable for heavy vehicles, and refers to individual HVRA using a name that is often not used anywhere else, making it difficult to identify whether you are in the correct location.

“Using the RMS online directory is hazardous. They list a lot of rest areas as being suitable for heavy vehicles but they are only suitable for cars”

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The HVRA Map provides minimal categorical detail about the facilities within the rest area. For example, a label is applied for “shelter”, without specifying whether this concerns shelter over the driver’s truck or the BBQ area, and for “heavy vehicle access”, without specifying whether the parking spaces are separated from light vehicles. There is also a disconnect between the categories of HVRA noted by Austroads and how drivers use HVRA. A driver has no way of knowing whether a rest area will be category 1 or informal until they arrive at the location, making it incredibly difficult for them to effectively manage their fatigue and rest well at these locations. This is particularly evident when considering the distribution of toilet facilities among the different HVRA classifications. Austroads suggests that RMS must only provide toilets in class 1 HVRA. However, as described above, workers are resorting to defecating and urinating along the perimeter of the rest area when no appropriate facilities are available. It is unlikely they are able to seek a bathroom in a nearby town or keep driving to another rest area.

The HVRA Map should be a useful tool in assisting truck drivers plan their work and manage their fatigue, however it currently does not provide enough detail for this to be the case.

Also of concern to drivers is the widespread use of HVRA by light vehicles. Heavy vehicle drivers believe that the use of heavy vehicle parking places, often by caravans or other holiday-goers, makes it more difficult for them to find a place to rest well.

Most rest areas are open to members of the public who travel long distances for recreational purposes and need to rest. The concept of shared light and heavy vehicle rest areas should not be an issue for truck drivers. If rest areas are correctly designed, adequately maintained, and parking spaces are sufficient, recreational and work-related drivers should be able to comfortably co-exist.

The issue occurs when recreational vehicles are using the areas inappropriately, staying for long periods of time and parking in the spaces designated for heavy vehicles. This is most obvious in less developed and smaller rest areas, which do not have a large and well defined separation of vehicle types.

When a rest area is full of recreational vehicles truck drivers must to continue driving to the next available rest area, risking the safety of themselves and others on the road. Alternatively, recreational vehicles have access to other places of rest, including accommodation in highway-adjacent towns.

In response to this, the NSW Government has introduced a Rest Area Parking Restriction Trial at two rest areas - in Yelgun and Arrawarra¹⁴, on the Pacific Highway in Northern NSW.

The trial consists of:

¹⁴ Roads and Maritime Services, ‘Rest area parking restriction trial, 28 February 2020, Accessed 28 April 2020, ‘<https://www.rms.nsw.gov.au/roads/using-roads/trip-information/rest-areas/rest-area-parking-restriction-trial.html>’

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- No parking in heavy vehicle spaces for vehicles under 12 tonnes
- Four-hour parking restrictions for light and recreational vehicles in general parking areas

A driver will be fined \$114 for breaching one of these rules.

No heavy vehicle driver should be unable to use a designated rest area because light vehicles are inappropriately using it. We eagerly await the results of this trial. If the trial is a success, the use of designated heavy vehicle rest areas by light vehicles should be banned wherever possible.

The HVRA Strategy

“Something needs to be done.”

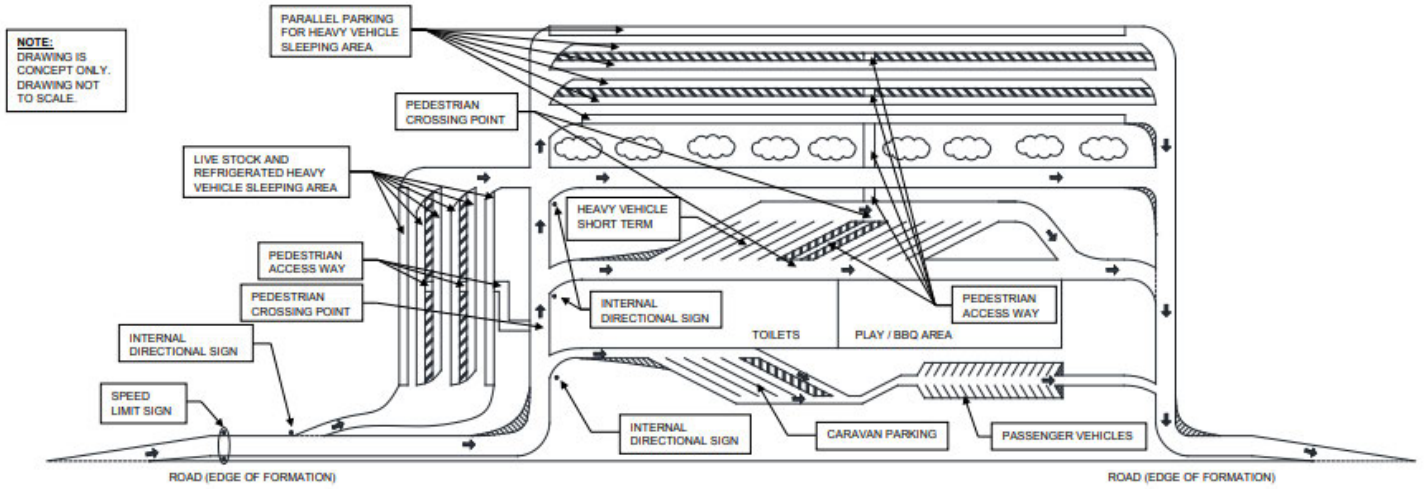
The RMS should address the poor standard of HVRA in NSW, and systematically manage the failings of the current network. We submit there is an urgent need for a revised HVRA framework to be finalised and published to ensure the safe management of HVRA in NSW can be enforced. If no plan is put in place workers will continue to suffer and be unnecessarily put at greater risk while working

The HVRA should be completed in consultation with industry and address the following matters for the entire NSW HVRA network:

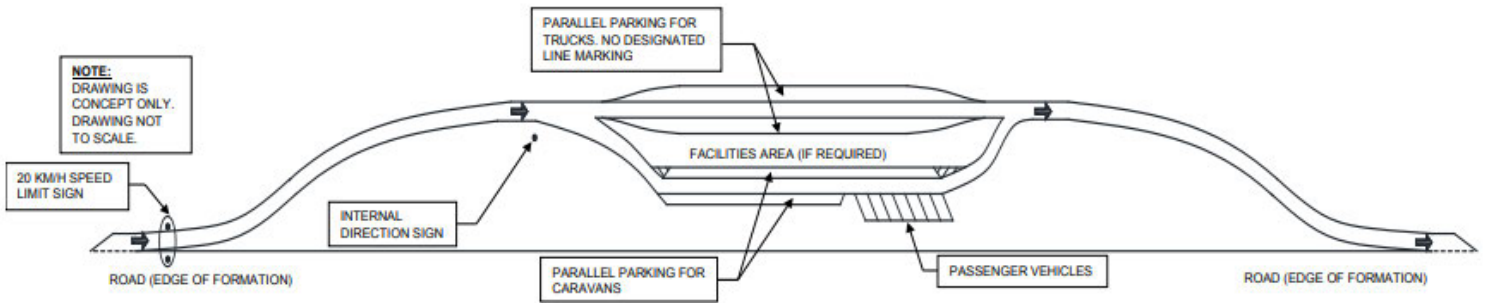
- The volume of traffic and the available number of rest opportunities
- The number of HVRA, where they are located and their classification
- Opportunities for new HVRA to be developed where gaps exist
- How HVRA will be constructed and who will be responsible for their maintenance
- How HVRA opportunities are communicated to workers
- The use of HVRA by light vehicles and holiday-goers

Appendix 1 – HVRA Layout Schematics

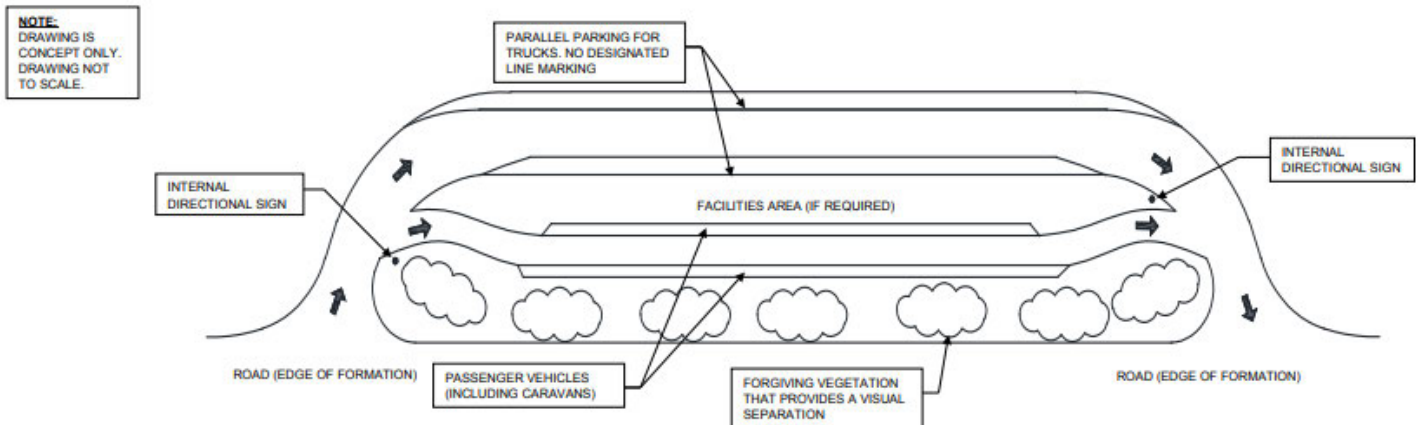
Class 1



Class 2



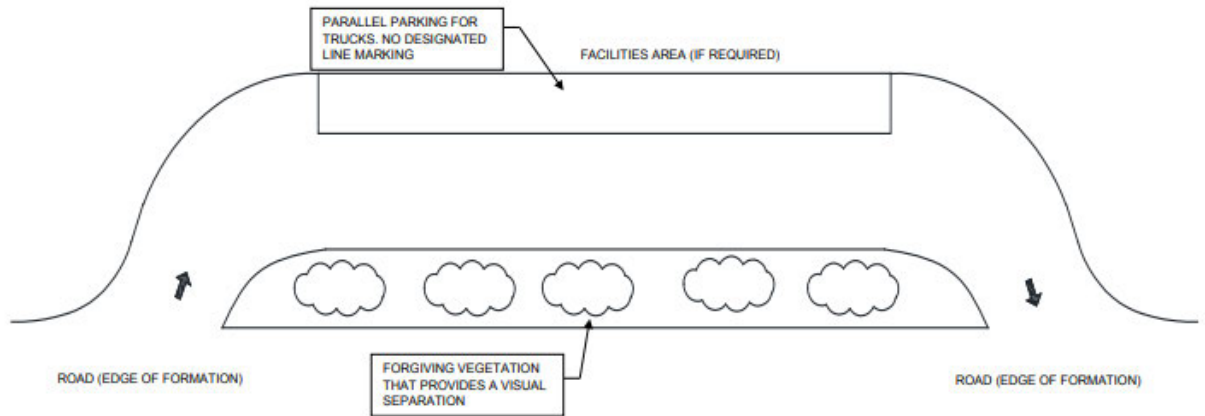
Class 3 and 4



APPENDIX: TWU HEAVY VEHICLE REST AREA INSPECTION & DRIVER SURVEY

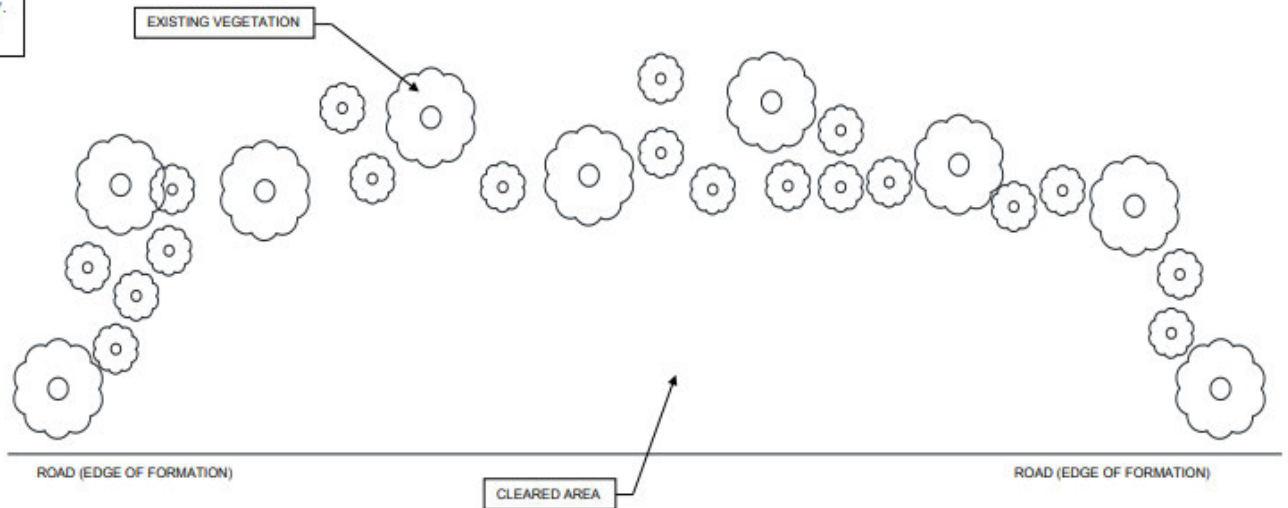
Class 5

NOTE:
DRAWING IS
CONCEPT ONLY.
DRAWING NOT
TO SCALE.



Informal HVRA

NOTE:
DRAWING IS
CONCEPT ONLY.
DRAWING NOT
TO SCALE.



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Appendix 2 –TWU HVRA Inspection Checklist

Rest Area	Address	Date	Time
		/ / 2020	AM / PM

Questions	Y/N	Photo
KEY SAFETY FEATURES		
- Is there safe vehicle access to the area?		
- Is the parking area clean (incl. odors)?		
- Are there any trucks waiting for a free spot?		
- Are light vehicles separated from heavy vehicles?		
- Are there any light vehicles currently parked in heavy vehicle spots?		
- Do any caravans or cars have awnings, tents or personal equipment set up?		
- Are noisy trucks (eg. Refrigeration, livestock) separated from regular trucks?		
- Are long-term visitors separated from short term visitors?		
- Is traffic flowing in only one direction?		
- Do the truck cabins face away from the highway when parked for rest?		
- Is there any security (staff, CCTV cameras etc) in the area?		
- Is there a safe system for pedestrians / walking around the area?		
- Was there adequate signage on approach and within the HVRA?		
- Are parking spaces well defined and line markings visible?		
Other comments:		

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AMENITIES (WHERE APPLICABLE)		
- Are pavements sealed?		
- Are tables/benches well maintained?		
- Is there shade or shelter over the rest area (and the truck cabins)?		
- Are the rubbish bins well maintained?		
- Is the lighting adequate (without shining into the truck cabin)?		
- Are the toilets well maintained? (toilet paper, sanitary bin, soap, water etc)		
- Is there drinking water available?		
- Is there a visitor information board?		
Other comments:		

How many surveys collected (if any):
Any other comments

Appendix 3 – TWU HVRA Survey



Transport Workers' Union of NSW

Richard Olsen State Secretary | P: 1800 729 909 | F: 02 8610 8099 | E: info@twunsw.org.au | W: www.twunsw.org.au

ABN: 77 710 588 395

1. Thinking about the heavy vehicle rest areas you use while working, how would you rate the quality of the following:

	Very Poor	Poor	Acceptable	Good	Very Good
The toilet facilities					
The rest area as whole					

2. Thinking about your use of heavy vehicle rest areas in the past 12 months, how often have you:

	Never	Rarely	Sometimes	Often	Always
Seen cars or caravans parked in truck parking spots?					
Kept driving because you could not find a parking spot?					
Had to go to the toilet at a rest area with inadequate facilities?					
Been unable to wash your hands after using the toilet?					
Had nowhere to leave your rubbish?					
Been unable to rest well because of loud sounds?					
Been unable to rest well because of bright lights?					
Been unable to access drinking water?					

3. Do you think there are currently enough heavy vehicle rest areas in NSW? [YES / NO]
4. Are there any rest stops do you believe are particularly bad, and require immediate attention or renovation? Can you list them?
5. Are there any rest stops do you believe are particularly good? Can you list them?

Optional:

Name:		Mobile:	
Age:		TWU Member?	Y / N
Gender:	M / F / Other		

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