

**Submission  
No 5**

**INQUIRY INTO PRESSURES ON HEAVY VEHICLE  
DRIVERS AND THEIR IMPACT IN NEW SOUTH WALES**

**Organisation:** Ron Finemore Transport Services Pty Ltd

**Date Received:** 14 September 2023

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14<sup>th</sup> September 2023

The Director  
**Portfolio Committee No. 6**  
**Transport & the Arts**  
Parliament House  
Macquarie Street  
Sydney NSW 2000

Email: [portfoliocommittee6@parliament.nsw.gov.au](mailto:portfoliocommittee6@parliament.nsw.gov.au)

Dear Sir / Madam,

**Re: Pressures on heavy vehicles drivers & their impact in New South Wales**

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My name is Mark Parry, and I am the Managing Director of Ron Finemore Transport Services Pty Ltd (RFT). RFT is a privately owned transport company which specialises in transporting food, produce and fuel products along the Eastern Australian seaboard utilising approximately 300 modern, safe, fuel and emissions efficient prime movers, high productivity trailers and employing close to 1000 people. Our NSW company owned depots include Orange, Goulburn and Wagga.

The inquiry's focus on the extent and impact of pressures on heavy vehicle driver practices is both timely and vital. The challenges faced by drivers in meeting regulatory obligations while coping with industry demands are substantial and require careful consideration. In line with the terms of reference and guide to making a submission, I will keep my comments clear and concise under the relevant terms of reference headings. Comments made are in relation to the transport operations RFT undertakes on behalf of its customers.

#### **Characteristics of the heavy vehicle industry in NSW that shape driver practice.**

The unique characteristics of the heavy vehicle industry in our region significantly influence driver practices. The diverse operational contexts, varying from metropolitan Sydney to rural and regional New South Wales, play a pivotal role in shaping how drivers navigate their responsibilities. Factors such as traffic congestion, road infrastructure, and geographic distances all contribute to the pressures experienced by drivers.

Safe and reliable deliveries of food, produce and fuel products are required to meet end customer expectations. These generally involve supermarket customers being able to find the available goods at the sites they attend when they attend. In other words, can access food, produce and fuel at the preferred point of purchase at the times of the day that most suit them. For drivers of heavy vehicles this invariably means that they start their shifts at various hours of the day but, particularly for fresh food and produce, in the early hours of the morning to enable stock to be delivered to stores and put on display ready for the early morning shoppers. This results in drivers needing to be at work (driving, loading and/or unloading) during the normal sleep cycle.

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This not only adds to the risk of fatigue, it also greatly impacts drivers home life and results in significant time away from home and the family. Work from home arrangements is not an option, and often the stay-at-home partner is left to manage the home, any childcare or child school duties and try and keep the house quiet when the driving partner returns home to sleep.

While the Government cannot regulate shopping hours, it is important to be aware of these factors and seek to take them into account when considering drivers needs for appropriate roadside rest, toilet and eating facilities, the ability to cost effectively use the safest and most efficient route into and out of pickup and delivery locations (toll roads and appropriate permitting to allow access from major roads into metro areas to the point of pickup or delivery) and for road side enforcement agencies to address real at risk behaviour and driving, rather than seeking to stop and fine drivers for minor paperwork breaches within work diaries.

The inquiry should also examine how the characteristics of different operational environments influence driver practices. In metropolitan Sydney for instance, drivers encounter congested traffic, restrictive access, and complex route planning, which can exacerbate pressures and impact regulatory observance. In contrast, drivers in rural and regional areas may face longer distances between rest areas and other amenities, posing challenges to fatigue management and compliance.

When considering rest and parking arrangements, the inquiry should consider the needs of male and female drivers (inadequate facilities are often cited as a cause for females not entering the industry), the ability for drivers to have easy access to safe parking and rest areas, particularly in metro areas and that customer sites have and allow access to appropriate toilet facilities.

**The current and future extent, nature and impact of pressures on driver practice and observance of regulatory obligations by heavy vehicle drivers in New South Wales (in particular its impact on the use of rest areas and other fatigue management practices)**

RFT continues to invest in the latest prime movers (average fleet age of approximately two years) inclusive of all the latest safety features and fuel efficiency and emissions platforms (Euro 6). This is supplemented by technology aimed at monitoring and managing risk and fatigue (telematics, Seeing Machines Guardian fatigue and distraction detection cameras including forward and driver facing and various side views). There seems to be very little acknowledgement of these investments and management practices when it comes to regulatory compliance. Drivers who are doing the right thing and who are deemed to be driving safely and alertly (as indicated by the technology) are made to feel continuously anxious by unnecessary road stops and/or costly fines for minor paperwork breaches. Being able to readily identify those fleets and equipment that employ these technologies and management oversight would allow enforcement agencies to spend more time overviewing fleets and drivers that are potentially more at risk.

Appropriately positioned and designed rest areas, leading into and out of metro areas, appropriate parking areas in and around major distribution centres and hubs. Appropriate planning oversight during the design and construction of new and emerging distribution and logistics assets, would help in providing heavy vehicle drivers with rest, shower and food requirements thus relieving some of the pressures that currently exist. The availability and suitability of rest areas, particularly in metropolitan Sydney and rural regions, are crucial for driver well-being and regulatory compliance. Adequate facilities with proper lighting, signage, and safety features are necessary to encourage their utilisation. The relevance of current rest area strategies and programs should be reassessed considering best practice fatigue management and regulatory standards.

Fatigue management practices must continue to consider and increasingly incorporate the use of technologies, such as Guardian Seeing Machines and EWD, to allow drivers to drive and work when rested and rest when needed (vs the current prescriptive driving hours regulations) for those companies and drivers who invest in these technologies and practices.

**The impact, effectiveness, and enforcement of current mechanisms to address current and future pressures and their impacts on heavy vehicle drivers in New South Wales, in particular:**

- i. training requirements for heavy vehicle drivers
- ii. training and education requirements for companies employing heavy vehicle drivers.
- iii. penalties for over height vehicle incidents
- iv. other mechanisms to address over height vehicle incidents.
- v. the availability, suitability and accessibility of, and priority locations for heavy vehicle rest areas in metropolitan Sydney, and rural and regional New South Wales
- vi. the suitability of heavy vehicle rest areas in terms of size, facilities, lighting, signage, and safety
- vii. the use of heavy vehicle rest areas and emergency stopping bays for fatigue management and logbook obligations
- viii. the relevance, practicality and timeliness of existing heavy vehicle rest area strategies and programs given best practice fatigue management and regulatory requirements.
- ix. identification of international best practice design guidelines and requirements for heavy vehicle rest areas and their suitability for New South Wales
- x. the maintenance of heavy vehicle rest areas and management of public use of heavy vehicle rest stop facilities

The occurrence of over height vehicle incidents remains a significant issue within the heavy vehicle industry. These incidents not only disrupt traffic flow and cause damage to infrastructure but also pose serious safety risks to both drivers and other road users. Addressing this issue requires a comprehensive approach that encompasses training, technological solutions, and stricter enforcement of height restrictions. Anecdotally, many over height incidents relate to containerised freight (with the wrong height containers being placed on the wrong height trailers) and/or rubbish and other waste material sticking up on loads. Identifying those key container and other loading sites that contribute to over height incidents and implementing laser height detection and alert technology pre any vehicle exit points would appear to be a potential low cost and effective risk management solution.

The pressures on heavy vehicle drivers also extend to their use of rest areas and compliance with fatigue management regulations. Limited rest area availability and unsuitable facilities, especially in high-traffic areas, result in drivers struggling to adhere to mandated rest periods. This leads to elevated levels of fatigue, impairing driver alertness and decision-making abilities. Furthermore, drivers may be compelled to forego rest breaks to meet tight schedules, compounding the issue. The consequent risk of fatigue-related accidents demands urgent attention and underscores the need for comprehensive rest area strategies that prioritise driver well-being and compliance.

The current and future pressures on driver practices and regulatory observance have a direct impact on road safety and compliance. Over height incidents remain a concern, often linked to time constraints and inadequate training on load securing. Similarly, the utilisation of rest areas and fatigue management practices are influenced by tight schedules and limited suitable facilities.

To mitigate these challenges, a multi-pronged approach is required. This includes enhancing driver training to cover not only operational skills but also load securing practices and route planning. Improved communication between industry stakeholders can facilitate better coordination and awareness of height restrictions and rest area availability. Additionally, the integration of advanced technologies, such as real-time route monitoring and electronic fatigue management systems, can empower drivers to make informed decisions that prioritise safety and regulatory compliance.

**The capability for new and emerging technologies to assist in reducing pressures for heavy vehicle drivers and effect driver practice and observance of regulatory obligations, such as through training, implementing safety measures and fatigue management).**

New and emerging technologies hold promise in reducing pressures on heavy vehicle drivers. Implementing advanced safety measures, electronic logbooks, and real-time monitoring systems can enhance compliance and mitigate risks associated with fatigue and over height incidents. Integrating these technologies into driver training and education is essential for effective implementation.

The continued support and recognition that investments and utilisation of fatigue management technologies (such as Guardian Seeing Machines) in conjunction with real time monitoring and electronic logbooks, should and can allow drivers the flexibility to drive when they feel fit and able to do so and rest when they feel tired. These technologies and this approach are increasing demonstrating that it safer and far more effective to allow drivers this flexibility as opposed to the current prescriptive driving hours regulations.

In conclusion, understanding the extent and impact of pressures on heavy vehicle driver practices is essential for safeguarding road safety and industry sustainability. I commend the committee's efforts to address this critical issue and am hopeful that the outcomes of this inquiry will lead to tangible improvements in the industry's practices and the well-being of its drivers.

I commend Portfolio Committee No. 6 for undertaking this inquiry, as it addresses a critical aspect of the transport industry that has far-reaching implications for road safety and driver welfare. The terms of reference reflect a comprehensive and balanced approach to understanding the multifaceted challenges faced by heavy vehicle drivers and identifying strategies to mitigate them.

Should you require any further information, please do not hesitate to contact us.

Yours faithfully,

Mark Parry  
**Managing Director**  
ref, mpjb026