**Submission No 21**

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

**Organisation:** Transport Workers' Union of NSW

**Date Received:** 22 September 2023


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**Submission**

***Inquiry into the pressures on heavy vehicle drivers and their impact in New South Wales***

*22/09/2023*

**Transport Workers' Union of New South Wales**

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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

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## 1. About the TWU

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

1.2 With over one hundred (100) years' experience representing the workers who conduct Australia's crucial passenger and freight transport tasks, 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.

## 2. Introduction

2.1 The TWU welcomes the opportunity to contribute to the 'Inquiry into the pressures on heavy vehicle drivers and their impact in New South Wales'.

2.2 By virtue of the long representational history that the TWU has with heavy vehicle operators within the transport industry, the TWU is uniquely positioned to comment on the pressures and challenges faced by heavy vehicle drivers.

2.3 The pressures faced by heavy vehicle drivers are, by no exaggeration, widely varied, due to the inherent nature of the industry, and by extension, demands that are placed on drivers through various parties.

2.4 In the context of the terms of reference outlined by *Portfolio Committee No. 6 – Transport and the Arts*, the TWU will address the key topics outlined by the terms of reference. Specifically, within the bounds of this submission, the TWU will discuss in depth the various characteristics and pressures of the heavy vehicle industry that remain relevant to the referred concerns.

2.5 Additionally, this submission will detail the connection between industry pressures and over height truck incidents, as well as fatigue management practices and rest stop usage. Other relevant elements will be discussed where necessary, and there will also be an overview on technology in relation to training, fatigue management and safety.

2.6 The TWU aims to provide a valuable contribution to the inquiry, particularly in relation to the concerns proposed in reference to the general characteristics of the transport industry, over height vehicle incidents, rest areas and fatigue management.

## 3. The characteristics of the heavy vehicle industry and various pressures that shape driver practice

3.1 What can best be described as the "characteristics" of the heavy vehicle industry denotes a broad range of topics and factors, many of which prove to be relevant in the shaping of driver practice.

3.2 Naturally, some characteristics of the heavy vehicle industry prove to be more concerning than others. The TWU believe it is necessary to provide context and insight into the more

notable factors for the benefit of the inquiry.

3.3 Typically, many of the "pressures" suffered by heavy vehicle operators are out of their control, and are commonly born from the superfluous demands of management. Examples of this include direction to skip breaks, work longer hours (despite fatigue), take faster routes, or cut corners (impacting safety), among many others.

3.4 "Characteristics", in the case of transport, doesn't merely refer to a live experience that drivers may face, or some kind of action. Truck driving is often a solitary occupation, one with little bargaining power and job control in many cases. Heavy vehicle operators are typically subject to complications relating to remuneration, in various different manners, extensive work hours and unrealistic demands from management, or a client.

3.5 The TWU finds it necessary to emphasise that road transport is Australia's deadliest industry. This is marked by alarming rates of death, injury and chronic health conditions, wage theft and pressures to work dangerously; factors that are the result of wealthy clients at the top of supply chains financially squeezing transport contracts.

3.6 To emphasise on this point; road transport is at the mercy of wealthy clients, such as ALDI, Amazon, Apple, and many more, who sit at the top of the industry's extensive supply chains. A combination of Australia's largest supply chain clients, based on recent reporting figures, boast more than $160 billion in revenue a year.

3.7 On the other end of the spectrum, operators and drivers transporting goods for these wealthy clients, suffer razor-thin margins and deadly pressure to delay maintenance, speed, and drive fatigued to make ends meet.

3.8 Indeed, for operators to survive in the industry, pay, conditions and safety are all cut, including truck maintenance and fatigue management. This results in transport workers being pressured to work harder, longer and faster to put food on the table, and keep a roof over their heads.

3.9 The current state of road transport can be attributed to the interest of wealthy clients towards maintaining, and continually increasing their gargantuan profits - all at the expense of the workers at the bottom of the chain, who suffer unreasonable, deadly contracts that prioritise the profiting and benefit of the client.

3.10 To that extent, it must be acknowledged that direction from management is often a considerable contributing factor in the shaping of driver practice. To analyse this is to look into a multi-layered issue.

3.11 Firstly, even without consideration to the relevant elements in the transport industry, or those that remain relevant to heavy vehicle drivers specifically, it is certainly evident that following direction, or specific demands from management, is something that most employees will do. This is simply a common standard within the working environment, for better or worse.

3.12 Though this kind of generalised workplace "culture", or "standard" exists across the board, the TWU is confident that the idea of "abusive leadership" is especially relevant in the transport

industry, and by extension, remains particularly harmful for heavy vehicle drivers specifically.

3.13 Abusive leadership, as a workplace concept, has been established for years. However, a very recent study into the concept of abusive leadership notes that it is defined as…

*"… subordinates' perceptions of the extent to which their supervisors engage in sustained display of hostile verbal and non-verbal behaviours, excluding physical contact."*[1]

3.14 To further elaborate, the aforementioned study notes the following as specific examples of abusive leadership being exercised;

*"This may include disrespect, aggression, mistreatments, verbal abuse, emotional abuse, humiliation, degradations, anger tantrums, ridiculing, belittling, and more."*

3.15 Such a description is a common reality faced by heavy vehicle drivers; so much so, that the TWU would, without question, consider this kind of "culture" to be a characteristic of the heavy vehicle industry, especially when giving consideration to what characteristics influence driver practice.

3.16 The TWU can note a wide range of personal examples that have been shared by members, or that the TWU itself has experienced firsthand in its dealings with members and their organisations.

3.17 One of the most common scenarios in which an example of abusive leadership can be observed is where heavy vehicle drivers are pressured by management to take an arterial route, or avoid toll roads for various reasons (primarily cost), which ends up forcing the drivers to take such routes.

3.18 In the TWU's own experience, heavy vehicle drivers do not "rat run" because they want to; such actions are born of the pressures placed on drivers by management, or other factors such as economic influence.

3.19 TWU NSW State Secretary, Richard Olsen, shares;

*"… it is all too common for us* [TWU Officials] *to witness a situation where a heavy vehicle driver is directed to continue working after they've already completed their hours, with complete disregard towards whatever level of fatigue the worker may be suffering. There have been many instances where a worker has been verbally abused for not wanting to continue work in such a scenario.*

*In other examples, their very employment has been threatened if they do not continue their work, or take a faster, perhaps more unsafe route on the road. Despite the potential dangers of such unreasonable commands, the worker often feels the need to comply – a compliance that is strictly born out of desperation, or fear of losing their livelihood.*

[1] Drory, A., Shkoler, O. and Tziner, A. (2022). Abusive leadership: A moderated-mediation through leader-member exchange and by organizational politics. *Frontiers in Psychology*, 13.

*We* [TWU] *can confidently say that in such cases, the blame is undoubtedly on management, and those at the top of the supply chains. These pressures from the top, that trickle down to the workers and the drivers at the bottom of the supply chain, is what paints a much larger picture. It is what creates these unhealthy workplace cultures and relationships. It is what is putting our critical workers; heavy vehicle drivers, in deadly situations – situations that are, unfortunately, considered the 'norm' now by many truck drivers."*

3.20 An abusive manager is capable of having such influence over an employee merely due to the fact that they hold a position of authority in the organization. This authority, as a superior, leaves an employee in a position where they are unable to resist compliance[2].

3.21 This power imbalance, born of abusive leadership, can lead to poor safety outcomes. In the TWU's experience, this is reflected through the bullying of drivers, to various ends, such as pressure to driver longer, faster, or perform their tasks to a standard that would otherwise be considered unreasonable, and in many cases, outright dangerous.

3.22 The second characteristic the TWU would highlight is the standard of training to become a heavy vehicle driver. The TWU believe that the current standards for accreditation for heavy vehicle drivers does not reflect the fact that transport is Australia's deadliest industry. The subject of training, however, will be discussed in detail further into this submission.

3.23 Another characteristic the TWU would note is the topic of remuneration, or in a broader sense, economic influences. Remuneration needs to be taken into consideration, as it remains a relevant influencing factor when assessing "driver practice". This becomes especially evident when viewed from a position that aims to assess safety.

3.24 Indeed, there are numerous examples of academic literature and studies that have been published with the intent of highlighting the connection between truck driver pay and safety performance; an association that, through those very same publications, has been determined as legitimate[3].

3.25 A report prepared for the Motor Accidents Authority of NSW, has confirmed the interlinked nature of remuneration methods and safety outcomes relevant for truck drivers. Among various other notes, the report details that the Inquiry, relevant to the scope of their research, received numerous pieces of evidence indicating that…

*"… freight rates were either too low, or being squeezed (in relations to margins) to the point where they were conductive to unsafe practices in relation to driving hours/number of trips, speeding, drug use and vehicle maintenance."*[4]

3.26 A paper on the link between compensation and commercial motor vehicle driver safety concluded that…

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[2] Ibid.
[3] Kudo, T. and Belzer, M.H. (2019). The association between truck driver compensation and safety performance. *Safety Science*, 120, pp.447-455.
[4] Quinlan, M. (2001). Inquiry into Safety in the Long Haul Trucking Industry. *University of New South Wales.*

*"… higher pay produces superior safety performance for firms and for drivers… clearly truck driver pay is an extremely strong predictor of driver safety."*[5]

3.27 A comprehensive Australian literature review on the connection between remuneration and truck driver safety outcomes determined that truck drivers are a vulnerable workforce. The review describes truck drivers as "price takers" rather than "price setters", due to a range of complicated factors, including;

- The limited bargaining power of truck drivers
- Prevalence of "undercutting" to win work
- High capital costs of entering the industry
- Lengthy sub-contracting chains
- Large clients (ALDI, Coles, Woolworths, etc.) in small numbers
- Tendering processes with little to no regard for the safety of the transport task
- Efficiency, and by extension, price gains reaped by the few large dominant companies in the industry[6]

3.28 Safety and efficiency in the transport industry are influenced by how, when and what is remunerated. By extension, there is an alarmingly apparent relationship between pay levels, risk behaviour and safety outcomes. Though indeed alarming, this unfortunately remains unsurprising, given that past literature has described the trucking industry as "sweatshops on wheels"[7].

3.29 In the TWU's experience, in applicable cases, monetary influence is often a key contributor in what route a driver may take to complete a given run. In some cases, a direction is received from management, whereas in others, the driver has no choice but to make the call themselves.

3.30 It is also necessary to consider that the cost of living is at an all-time high, particularly in the post-COVID era. The TWU notes that, through its own observations, and the reported experience of its members, any economic pressures or factors contributing to driver behaviour have only become more prevalent.

3.31 The Australian economy, even just in 2022, was characterized by surging inflation and cost of living. Wage growth has not met the rate of inflation, and without meaningful wage growth, household consumption may very well be impacted further by interest rates than initially expected, which would ultimately result in the worsening of cost-of-living pressures[8].

3.32 External factors, such as the Australian economy, still prove to be relevant in contributing to the pressures faced by heavy vehicle drivers; there is ultimately a reason behind the

[5] Belzer, M.H. (2012). The Economics of Safety: How Compensation Affects Commercial Motor Vehicle Driver Safety.
[6] Mooren, L., Williamson, Ann and Grzebieta, R. (2015). Evidence that truck driver remuneration is linked to safety outcomes: a review of the literature. *Transport and Roads Safety (TARS) Research*.
[7] Ibid.
[8] Tsiaplias, S. and Wang, J. (2022). The Australian Economy in 2022-23: Inflation and Higher Interest Rates in a Post-COVID-19 World. *Australian Economic Review*, [online] 56(1).

connection between remuneration and safety performance, and currently, the cost of living is a significant contributing factor.

3.33 Another characteristic of the industry that the TWU find relevant is one that, again, relates to economic pressures. The cost of operating a heavy vehicle, and by extension, operating in the industry as a whole, has only increased in recent years.

3.34 Toll roads are one of the most significant contributing costs to the operation of a heavy vehicle on NSW roads.

3.35 Many TWU owner drivers cite toll road costs as one of their primary "cost of living" contributors and concerns. Additionally, even large, national companies avoid using the toll roads due to costs. The TWU has, on multiple occasions, witnessed direction from management to avoid toll roads due to cost.

3.36 This, among the aforementioned factors, must be considered when analysing the broad scope of the "characteristics" relevant to the heavy vehicle industry.

## 4. The connection between over height vehicle incidents and pressures faced by heavy vehicle drivers

4.1 There are a number of reasons why over height vehicle incidents may occur; reasons that can typically be attributed to various influencing factors and pressures faced by heavy vehicle drivers.

4.2 Among the various pressures, however, the most pressing issue remains the training and education requirements for heavy vehicle drivers in NSW. To specify, the problem in question is that it is too easy to get behind the wheel of a heavy vehicle in any official capacity.

4.3 To obtain a heavy vehicle licence in NSW, there are two pathways in which an individual may go. There is a Heavy Vehicle Competency Based Assessment (HVCBA) and a heavy vehicle driving test.

4.4 The HVCBA is considered the primary method of obtaining a heavy vehicle licence, and can be completed through a Registered Training Organisation (RTO). In contrast, the heavy vehicle licence test is available in areas where the HVCBA is not, and is completed with a Service NSW testing officer. If applying for a Multi Combination (MC) class licence, it is a requirement to take the HVCBA rather than a heavy vehicle driving test.

4.5 In addition to this practical component, an individual must complete a Heavy Vehicle Knowledge Test prior to undertaking a HVCBA or heavy vehicle driving test. Regarding the HVCBA specifically, in the TWU's own experience and long-time observations, it is common for the HVCBA to be conducted to an otherwise unacceptable standard considering the responsibility of a truck driver, as well as the nature of the job.

4.6 TWU Official & Campaign Coordinator, Rob Rasmussen, shares his experience when obtaining his own heavy vehicle licence;

*"… when I went to complete the competency assessment* [HVCBA]*, it was shockingly simplistic. I was put behind the wheel of the truck, and the instructor sat in the passenger seat… from his yard, we drove to a nearby McDonalds. The instructor ordered food, sat in the passenger seat and ate while reading a paper for an extended period of time… and then, we drove back to his yard. After that, he said words to the effect of; 'Yeah, you're good enough mate.', and that was virtually the end of it.*

*That was a quite a sobering moment. I thought; 'Was that it…?' Completing a HVCBA and obtaining a truck driver licence is too simple. And after that, in the common case of the average truck driver, you're essentially thrown to the wolves."*

4.7 The loose standards for truck driver licensing applies on multiple fronts. The standards remain relevant in the context of an individual simply looking to obtain their heavy vehicle licence. However, there have also been blatant issues regarding the recognition of international truck licences.

4.8 Historically speaking, the TWU have always been vocal in support of creating a more in-depth system for obtaining a heavy vehicle licence in NSW. In 2022, the TWU wrote to the then Prime Minister, as well as Austroads, to demand that consultation on licensing changes involve the union and workers that have been calling for a carefully thought-through, evidence-based progression to competency-based licensing for years.

4.9 This came off the back of the Morrison Government's announcement in January 2022 to recognise New Zealand truck licenses in Australia; one which was silent on any mandatory safety and training inductions, meaning there would be no requirement for foreign drivers to understand local road rules or industry requirements like fatigue management, mandatory breaks and how to handle Australia's most dangerous roads.

4.10 This specific announcement demonstrates that, following years of inaction to tackle deadly pressure throughout supply chains, the best the then Federal Government could do was to dangerously cut corners on safety in essential transport workplaces, and bring in potentially exploited foreign labour with no experience on Australia's unique roads.

4.11 There are specialised industries relevant to heavy vehicle drivers, many of which maintain unique elements that are challenging, and would realistically demand formal training. For example, there are heavy vehicle drivers who cart live loads (animals), or dangerous goods, among others.

4.12 There is no requirement within the training of obtaining a heavy vehicle licence in how to safely load a heavy vehicle, how to secure the load, how to safely strap it, nor how to maneuver the vehicle with the load on board. These factors become the responsibility an employer.

4.13 In the TWU's own experience, it is all too common for this responsibility to not be met by employers.

4.14 To specify, it is common for a heavy vehicle driver to be allocated an over height vehicle without any prior training or education on the specific vehicle they are operating, and in some

instances, without acknowledgement that the vehicle in question is over height to begin with.

4.15 For a heavy vehicle driver, there is a significant level of reliance on managers of the business, loaders and allocators to make sure that everything is loaded on their truck properly, or that everything in the context of a given run has been allocated appropriately. In many cases, a driver is incapable of inspecting their own load once it is on the truck, as it has already been secured. On the road, however, these drivers are considered "responsible" for their load.

4.16 Further, the typical practice in the industry is for a heavy vehicle driver to, without exaggeration, use their UHF CB radio to communicate with another driver on the road, and ask for direction on how to use a certain route they have been allocated. This is common in contexts where a heavy vehicle driver may be directed to use back roads to reach a particular destination; said route being unfamiliar to the driver. When one driver requests direction from another, there is typically no consideration or question towards what the vehicle's size is.

4.17 In this respect, it should be noted that, in conjunction with the aforementioned industry pressures, as well as the information forthcoming in this submission, that the pressures of the industry typically do not facilitate further training while on the job.

4.18 This is especially relevant because, as detailed previously, the actual process in obtaining a truck licence in NSW is entirely unsatisfactory in the first place.

4.19 There is no training on how to measure a truck, and there is no emphasis on being aware of a truck's size. This extends to environments within a company. Typically, transport companies will list vehicle weight on their run sheets, but not height, leaving only further room for unwilling ignorance on the part of the driver themselves.

4.20 In reference to the previously mentioned evidence-based progression to competency-based licensing, the TWU is of the belief that such a training program or degree of standards is necessary in creating a safer, more sustainable transport industry. An existing example of this standard of accreditation is the Transport & Logistics industry BlueCard.

4.21 A BlueCard is proof that an individual has completed training in an industry-specific, nationally accredited unit of competency in Work Health and Safety (WHS). Regarding transport and logistics in particular, BlueCard can improve the health and safety of heavy vehicle drivers in ultimately delivering a safer, more efficient and sustainable supply chain.


*Example of the Transport & Logistics BlueCard.*

4.22 With the above, tangible example in mind, it should be noted that the BlueCard has been made digital as of 2022.

4.23 The Transport & Logistics industry Blue Card, specifically, is a minimum entry level, work health and safety (WHS) training course designed to promote awareness and understanding of basic safety needs and procedures. By extension, it is designed to develop and maintain consistent safety standards for the transport and logistics industry.

4.24 In obtaining a BlueCard, a truck driver will have gone through thorough training in being exposed to WHS education, identifying key hazards, understanding their vehicles, and other important factors relevant for competency that will make a significant difference in preventing incidents such as over height truck collisions, among many others.

4.25 TEACHO, the Transport Education Audit Compliance Health Organisation, is a registered RTO that can an award a BlueCard to transport workers following successful completion of relevant training and education. TEACHO shares…

*"For the sector to operate efficiently, and safely, we need safe drivers, warehouse and depot workers. BlueCard provides a solid foundation for work health and safety in the Transport and Logistics Industry."*

4.26 Safety training cards are requirement in industries including rail, maritime, construction and mining. Being such a dangerous occupation, the same standard should be required for heavy vehicle drivers. As such, the TWU would urge the inquiry to consider the importance of developing a minimum standard of competency for truck drivers.

4.27 By extension, the TWU would note that regulation is required for the BlueCard space, as it is not void of dubious operators. It is necessary for accredited RTOs, such as TEACHO, to have the exclusive right to train transport workers. In the pursuit of creating a safer industry, with a national standard of competency, this much is necessary.

4.28 In the TWU's experience, when a truck driver gets stuck in major motorway tunnels, it is because they are not trained to the required standard. The knowledge required to operate a heavy vehicle on NSW roads is not instinctive. The necessary, practical knowledge is earned through comprehensive and serious safety training.

4.29 From this, the TWU would like to highlight issues surrounding penalties on Heavy Vehicle drivers in over height incidents.

4.30 Professional drivers are bearing the brunt of punishment, rather than the company responsible for the processes they have in place. Furthermore, the TWU maintain that if "professional" drivers are to be treated as such, and punished accordingly, then they need to be provided with the proper training and education fit for a professional. The current standards of training and education do not reflect this.

4.31 To this extent, what is necessary in the context of licensing requirements for truck drivers is, as detailed, experience and competency-based licensing that maintains proper standards. With the current state of licence standards for heavy vehicle drivers, it is unrealistic and

entirely inequitable for drivers to constantly bear the brunt of consequences for what is ultimately an issue bigger than any individual person.

**5. Fatigue management practices & heavy vehicle rest stops**

5.1 Fatigue is a serious safety hazard; a fact that is well known and undisputed in every capacity. As such, fatigue management is a primary concern for the TWU.

5.2 Fatigue is generally understood to be a state of extreme tiredness. A particular cross-sectional study on Australian truck drivers notes that fatigue is defined as;

*"… physical or mental state of a lack of energy and concentration where sleepiness, tiredness, drowsiness and lethargy are often used interchangeably"*[9].

5.3 The same study determined that prolonged work hours, high-risk work tasks, poor sleep and feelings of loneliness were positively associated with fatigued driving; conditions that are commonplace in the industry, as consistently observed by the TWU. Additionally, the study demonstrates that truck driver working hours must be improved within the constraints of regulatory and occupational requirements in an effort to combat fatigue and facilitate fatigue management[10].

5.4 A further implication from the aforementioned study is that there are systemic issues influencing fatigue outcomes; a determination that is by no means alien to the TWU and the realised experience of its members.

5.5 The study finds;

*"The findings of this study inform the recommendations to reduce fatigue of drivers, and ultimately, improve the safety of this critical cohort of the workforce. The results suggest a system-level review and revision of rostering schedules to manage working hours, wellbeing initiatives to promote mental and physical health, and strategies to promote a sense of belonging in the workplace are all required. A review and revision of regulatory strategies focused on driving and rest times and the provision of truck stops are also supported."*[11]

5.6 In reference to the aforementioned study, the TWU would like to note that influences such as working hours are often beyond any individual driver's control. The TWU considers these characteristics to be among the many pressures faced by heavy vehicle drivers.

5.7 A separate Australian literature review into managing heavy vehicle driver fatigue determined similar results to the aforementioned study. The critical review notes that in order to manage driving performance, frequent rest breaks are necessary for heavy vehicle drivers. Additionally, it is noted that workplace management practices are necessary in facilitating a safe driving experience for heavy vehicle drivers; the firm a driver is working for must also be

[9] Ren, X. *et al*. (2023). Factors Associated with Fatigued Driving among Australian Truck Drivers: A Cross-Sectional Study. *International Journal of Environmental Research and Public Health*, 20(3), p.2732.
[10] Ibid.
[11] Ibid.

concerned with the implementation of safety management practices[12].

5.8 This finding further validates the idea that fatigue management is not entirely within the control of a heavy vehicle driver themselves, but rather, is dependent on facilitation through management. As such, the TWU would urge the inquiry to take this into consideration.

5.9 Naturally, heavy vehicle rest areas (HVRAs) are a key facilitator of fatigue management for heavy vehicle drivers. HVRAs provide heavy vehicle drivers a means of managing their fatigue on the road, by allowing them to safely stop their vehicle and rest. It is no exaggeration to say that the provision of adequate HVRAs is crucial to ensuring the health and safety of workers in the NSW freight task.

5.10 HVRAs typically 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 HVRAs also include bathrooms, shade, rubbish bins, the separation of vehicle types, security lighting and water.

5.11 By extension, HVRAs are, or rather, should be, equipped with adequate facilities such as clean, working bathrooms. However, in the experience of the TWU and its members, this is not always the case.

5.12 It is not uncommon for HVRAs to host a bathroom that is in borderline unusable condition, due to any combination of factors ranging from being unclean, "broken" to any given capacity, vandalised, among other reasons.

5.13 The TWU conducted extensive research throughout 2020 on HVRAs in NSW. For the purpose of this inquiry, the TWU believe it would be beneficial to share a range of key findings and statements from the research. This research involved physical inspections of various HVRAs 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

5.14 The research conducted surveyed a total of 269 workers. 172 HVRAs were included as part of this study, and of the 172, 51 were either inaccessible, unable to be located, or otherwise not assessed.

[12] Alaiakbari, M. and Moridpour, S. (2017). Managing Heavy Vehicle Drivers' Fatigue: A Critical Review of the Literature and Safe System Interventions. *Journal of Geotechnical and Transportation Engineering*, 3(1), pp.20-24.

5.15 The research has produced interesting results that the TWU finds relevant to share, in this context. Listed below are some notable findings;

- HVRAs 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.

- The TWU 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.

- There was a lack of appropriate sanitary bins in (then) current bathrooms and a lack of dedicated female bathrooms across the network, despite a growing number of female transport workers.

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

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

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

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

- Light and heavy vehicles were structurally separated in only 22% of inspected HVRAs. In these HVRAs, it was observed that light vehicles (often with caravans and trailers attached) were using dedicated heavy vehicle parking spaces 12% of the time.

- A number of HVRA locations had discarded needles. This presented an obvious risk to the health and safety of workers, and serves to further demonstrate the unkept condition of the areas.

5.16 The study conducted by the TWU also observed the attitude of workers towards HVRAs, and what kind of impact the condition of HVRAs had on drivers. Listed below are various statements gathered from heavy vehicle drivers under the study;

- *"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."*

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

5.17 The majority of drivers rated the overall quality of HVRAs as poor (39.03%) or very poor (18.59%). Only 11.16% of drivers rather the quality as good or very good (Figure 1).

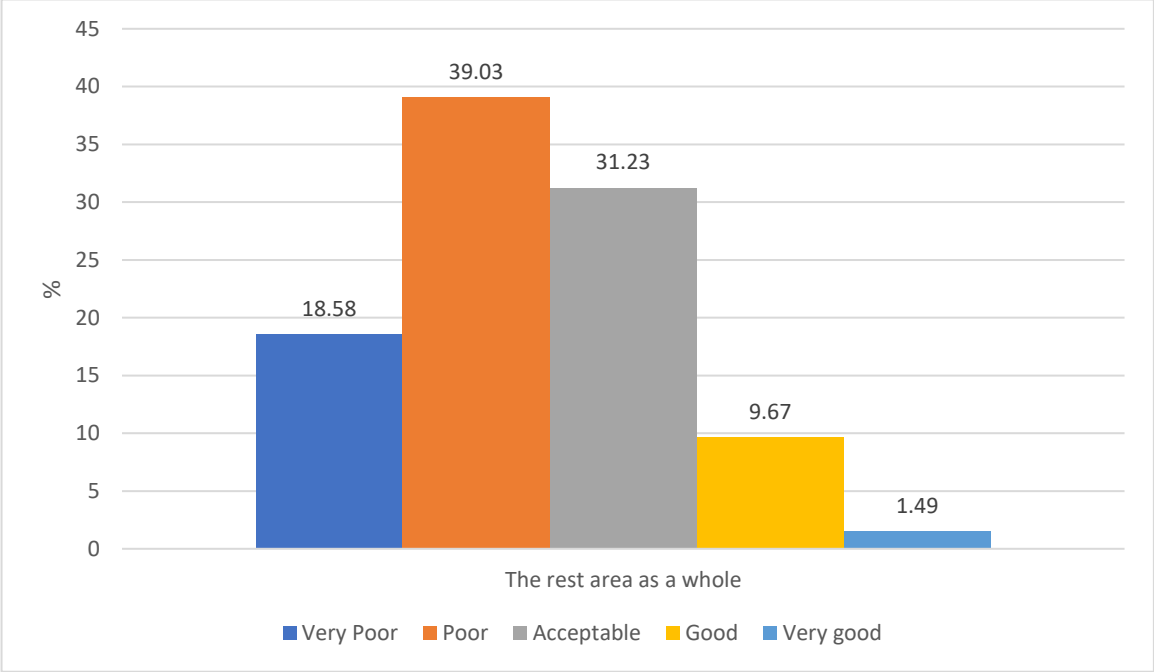


**Figure 1:** Attitudes of heavy vehicle drivers towards HVRA facilities.
*Question 1a – Thinking about the heavy vehicle rest areas you use while working, how would you rate the quality of the rest area as a whole?*

5.18 The overwhelming majority of heavy vehicle drivers surveyed believe that there are not enough HVRAs in NSW (Figure 2).

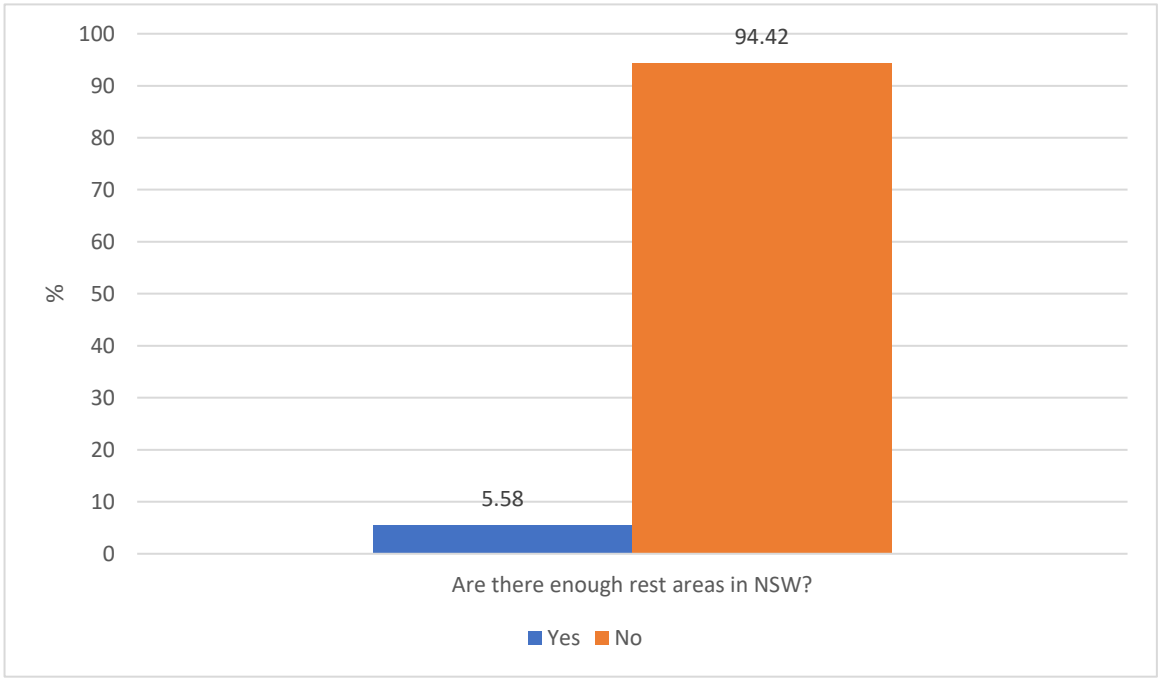


**Figure 2:** The attitudes of heavy vehicle drivers towards the number of HVRAs in NSW. *Question 3 – Do you think there are currently enough heavy vehicle rest areas in NSW?*

5.19 Almost all surveyed heavy vehicle 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 3). In reference to the abovementioned driver statements, light vehicle occupation of heavy vehicle areas serves to complicate the practice of heavy vehicle drivers.

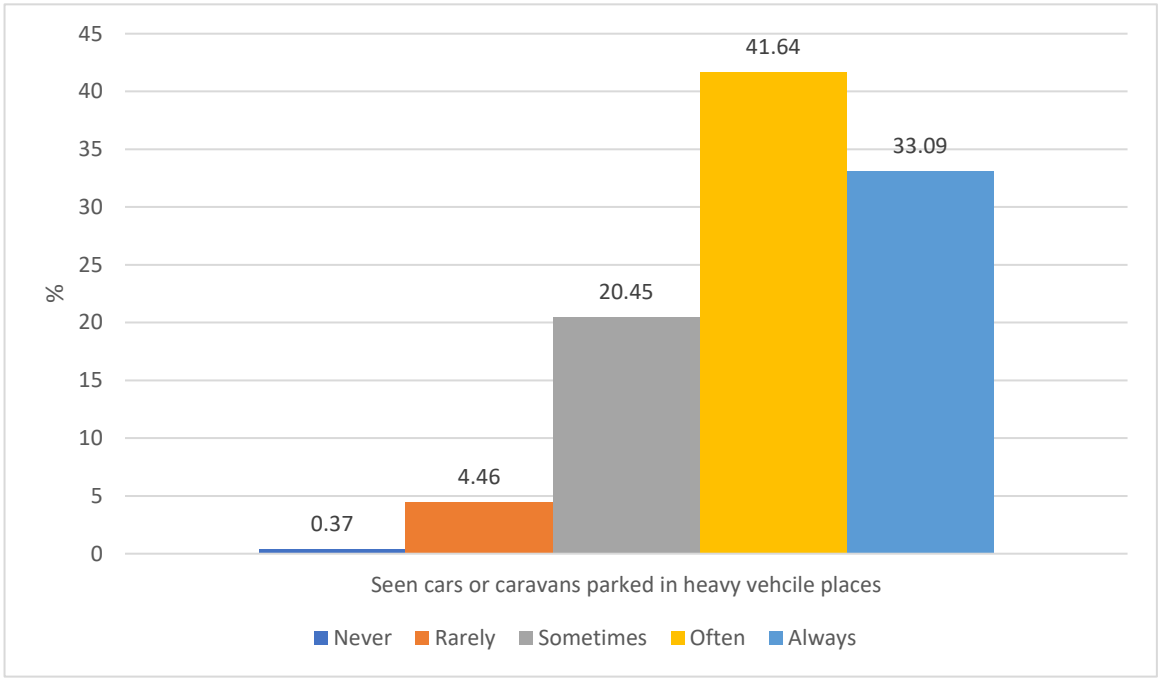


**Figure 3:** The use of HVRAs by light or heavy vehicles.
*Question 2a – Thinking about your use of HVRAs in the past 12 months, how often have you seen cars or caravans parked in heavy vehicle places?*

5.20 Further heavy vehicle driver statements, specifically about light vehicles occupying heavy vehicle areas, provide further insight into the perspective of 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 for 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."*

5.21 The listed statements indicate a very clear frustration on the part of heavy vehicle drivers. It is evident that the presence of light vehicles in these heavy vehicle spaces serves as a deterrent for heavy vehicle drivers to use the HVRA in question.

5.22 As such, the TWU would highlight the importance of ensuring heavy vehicles have appropriate access to their own designated spaces. The presence of light vehicles in these areas is preventing heavy vehicle drivers from exercising proper fatigue management practices.

5.23 Indeed, the TWU also observed a belief among heavy vehicle drivers that the use of HVRAs by light vehicles has an impact on the availability of parking;

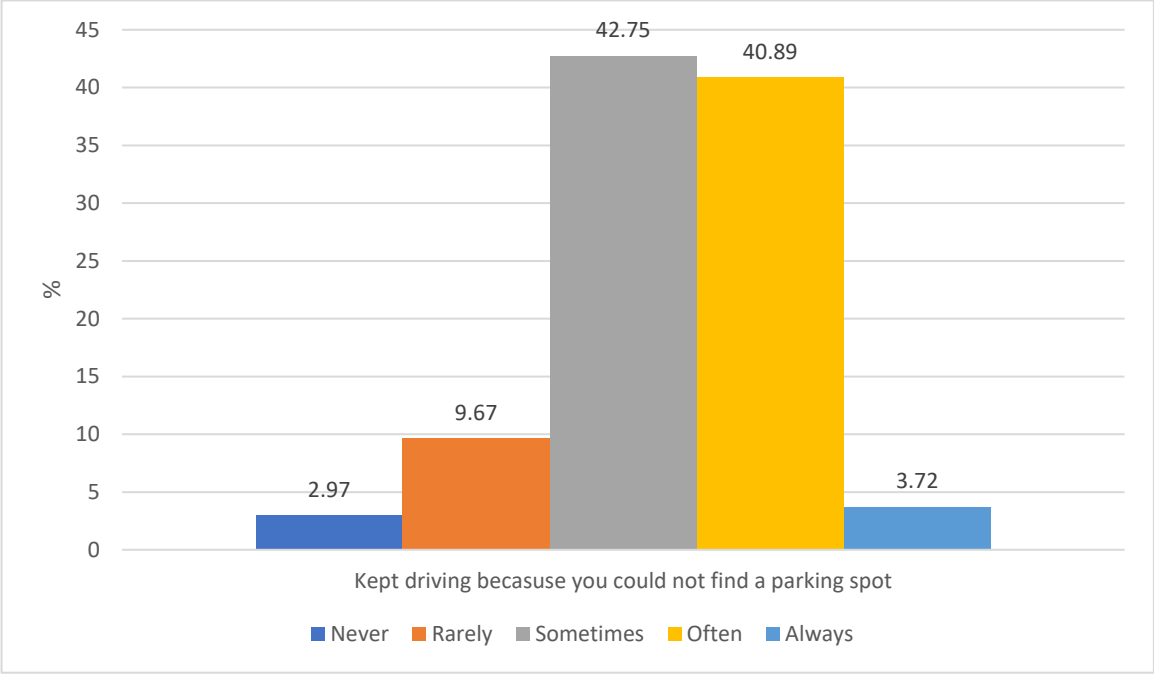


**Figure 4:** The availability of parking at HVRAs.
*Question 2b – Thinking about your use of HVRAs in the past 12 months, how often have you kept driving because you could not find a parking spot?*

5.24 The majority of drivers (42.75%) (Figure 4) are sometimes required to keep driving past HVRAs they wish to use because they cannot find an appropriate place to park. Alarmingly, an additional 44.61% (Figure 4) of drivers said they had to do this often or always.

5.25 In relation to Figure 4, there are further heavy vehicle driver statements that assist in illustrating this critical cohort's perspective on HVRAs;

*"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."*

5.26 In relation to the unsuitable condition of amenities at HVRAs, such as toilets, as mentioned earlier, the TWU's research naturally included this within its scope. The vast majority of drivers surveyed rated the quality of toilets at HVRAs as poor (42.11%) or very poor (31.58%) (Figure 5). A majority of drivers also reported often (51.30%) or always (8.92%)

needing to use a bathroom when only inadequate toilet facilities were available (Figure 6).

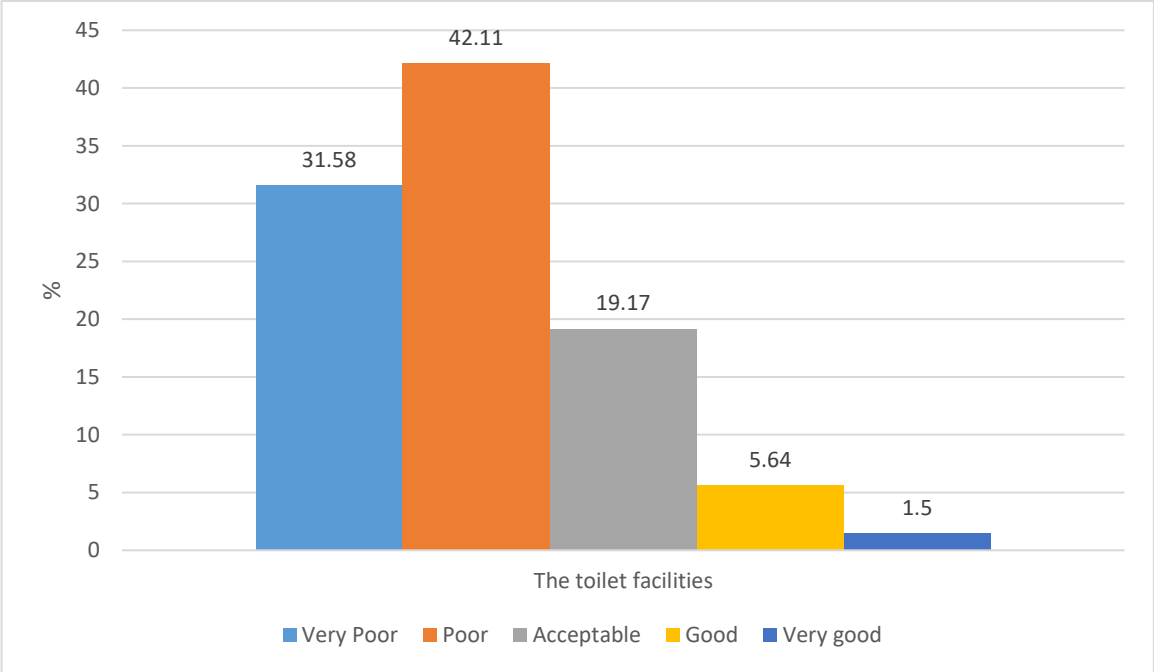


**Figure 5:** Attitudes of heavy vehicle drivers towards toilet facilities at HVRAs.
*Question 1 – Thinking about the heavy vehicle rest areas you use while working, how would you rate the quality of the toilet facilities?*

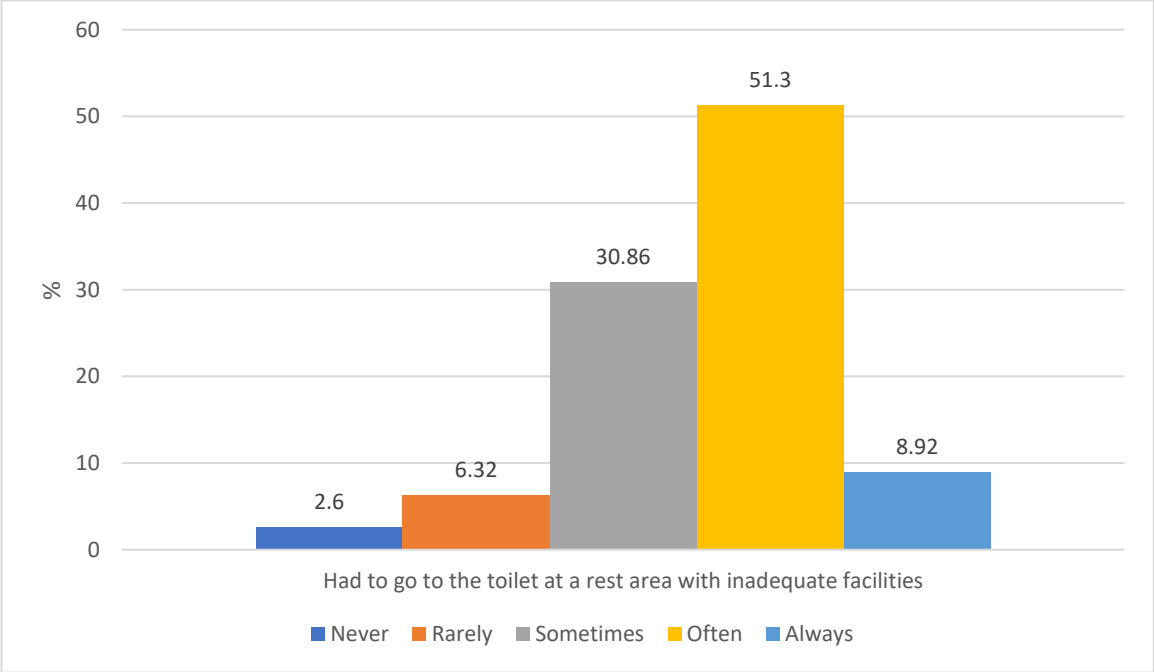

**Figure 6:** Inadequate toilet facilities at HVRAs.
*Question 2c – Thinking about your use of HVRAs in the past 12 months, how often have you had to go to the toilet at a rest area with inadequate facilities?*

5.27 The results of the research conducted by the TWU that has been shared in this submission is only a portion of all the findings. For the sake of concision, only the abovementioned findings and results have been listed.

5.28 At the time the research was conducted, and unfortunately, at the time of this submission, there is an unacceptably high number of poor HVRAs that do not allow workers to rest well. The priority of policy should be to ensure that workers are able to use the HVRA network effectively and provide for as many good HVRAs as possible.

5.29 Though the state of HVRAs is disappointing, the common reluctance of heavy vehicle drivers to even utilise HVRAs, as evidenced through the TWU's conducted research, remains unsurprising.

5.30 Regardless, the findings presented illustrate the general attitude of heavy vehicle drivers towards HVRAs in NSW. These attitudes, however, are reflective of the condition HVRAs are in themselves.

5.31 Though the condition of HVRAs, their availability and convenience, as well as any given HVRA's ability to provide its intended utility to its expected extent, is a significant determinant of heavy vehicle driver practice in fatigue management, it is also necessary to consider the influence of management and the pressures faced by drivers in that category.

5.32 As discussed previously, abusive leadership can extend to various different situations. Naturally, this concept also extends to fatigue management practices, and by extension, the usage of HVRAs. As outlined, through the TWU's own experience and observations, it is common for drivers to be directed to, or be pressured into, skipping rest breaks on the road.

5.33 Consequently, this does lead to heavy vehicle drivers not using HVRAs at certain times. The TWU is confident in maintaining that driver practice in relation to the use of HVRAs is influenced by the current state of HVRAs, as well as pressures from leadership and economic factors in conducting their work.

5.34 As such, the TWU would urge the inquiry to take into consideration that, in the context of HVRA usage, as well as general fatigue management practices, heavy vehicle drivers are often at the mercy of either their leadership, economic influences, or what resources are available to them – or typically, a combination of those three elements.

5.35 The poor standard of HVRAs in NSW must be addressed. The failings of the current network need to be systematically managed. The TWU submit that there is an urgent need for a revised HVRA framework to be finalized and published to ensure the safe management of HVRAs in NSW can be enforced. If no plan is put in place, heavy vehicle drivers will continue to suffer and be unnecessarily put at greater risk while working.

5.36 HVRA strategies 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 HVRAs, where they are located and their classification
- Opportunities for new HVRAs to be developed where gaps exist
- How HVRAs will be constructed and who will be responsible for their maintenance
- How HVRA opportunities are communicated to workers
- The use of HVRAs by light vehicles and holiday-goers
- Potential need for upgrades and expansion of HVRAs for future industry developments

5.37 In more specific reference, future capacity is an attribute that needs to be considered especially. HVRA size and location must remain at the forefront of future planning. Essentially, the TWU believes it is necessary to "future-proof" HVRAs, by allowing for any future expansions relative to the progression and evolution of the freight task in NSW.

## 6. New and emerging technologies in relation to the pressures faced by heavy vehicle drivers

6.1 As discussed, the pressures faced by heavy vehicle drivers are broad in nature, and cannot reasonably be pigeonholed into a particular category, or attributed to any singular reason.

6.2 However, safety is a typically broad term that denotes a significant range of implications. In relation to safety technology equipped in heavy vehicles, there is a notable focus on fatigue management, driver aids and general safety measures.

6.3 As fatigue management is a contentious topic; contentious in the sense that there has been debate over the years as to just what kind of approach, or particular system, may prove to be the most effective in managing fatigue, technological assistance is typically an avenue in which relevant parties turn towards.

6.4 With that in mind, there is evidence that technology can in fact assist in reducing on road pressures for heavy vehicle drivers, as well as affect driver practice. However, the TWU would urge the inquiry to note that it is important to bear in mind just what kind of technological assistance being used is relevant, as well as how said technology being implemented or introduced.

6.5 Though technology does have the potential to make positive impacts on the safety experience of heavy vehicle drivers, it is unquestionable that to realise the full potential of new and emerging technologies, the reception of these technologies by the drivers who will be using them, and would be subject to their practices, must be positive.

6.6 It is necessary to note that transport is an aged industry. In 2022, it was reported that the median age of truck drivers in Australia was 47 years old – higher than the all-jobs average of 40 years[13].

[13] Truck Drivers. *Labour Market Insights*. [online] Available at: https://labourmarketinsights.gov.au/occupation-profile/drivers-truck?occupationCode=7331

6.7 Aging heavy vehicle drivers in Australia have shown resistance to the adoption of particular safety technologies being integrated into their heavy vehicles. This much has been made evident to the TWU through its own dealings with transport companies, and its own members.

6.8 Typically, in the TWU's experience, the hesitancy of heavy vehicle drivers to use certain pieces of technology is born of specific concerns. Generally speaking, aged heavy vehicle drivers seem set in their ways – sometimes, the reasoning behind their resistance towards particular safety technologies or interventions is simply because adopting such an avenue of safety management is completely different to what they have been familiar with throughout their often-long careers.

6.9 Lack of consultation is, unfortunately, a common occurrence, and a significant reason behind the hesitancy of drivers in relevant cases. There have been examples brought to the TWU from members, even in large national companies, where certain protocols were introduced, or pieces of equipment were installed in a vehicle, without any consultation. In such a case, it is entirely justifiable for an employee to demonstrate concern or hesitancy.

6.10 In the context of heavy vehicles, research has indicated that it is common for aging drivers to avoid using novel technology[14].

6.11 It has also been recorded that in some cases, heavy vehicle drivers will opt to pursue a new place of employment[15]. Such a phenomena is not foreign to the TWU's own experience with members, and thus, the idea that research also demonstrates this reality is unsurprising.

6.12 The TWU believe that the adoption of new technologies in the pursuit of fatigue management and safety measures would require the appropriate input from, and consultation with, heavy vehicle drivers.

6.13 It is also necessary to acknowledge that training would be required for the proper usage of technology. However, in the context of heavy vehicle drivers, who as discussed, are an aged workforce, this becomes even more relevant.

6.14 In addition to training regarding the actual use of technology, it is important to note that training – as a broader subject – is an area of concern for the TWU. Specifically; physical, hands-on training has, in the TWU's observations, and in the lived experiences of its members, in some cases been replaced by digital "training".

6.15 The prevalence of modern technology allows for digital training solutions across the board, for all industries. Though visual content may prove beneficial for certain industries, job roles, or disciplines, the TWU would note that "training" through means of simply watching a video is not a suitable substitute for hands on experience.

[14] Sendall, M.C. *et al*. (2021). Truckies and the Australian transport industry: Managers' perspectives about enablers and inhibitors to workplace health promotion. *Work*, 68(1), pp.161-169.
[15] Newman, S. *et al*. (2020). Older truck drivers: How can we keep them in the workforce for as long as safely possible? *Safety Science*, [online] 121, pp.589-593.

6.16 The TWU go to the extent of highlighting this as it has been observed in practice within the transport industry. Heavy vehicle drivers are often made to watch a training video on a subject that would otherwise require physical, hands-on experience. In such cases, particularly when pertaining to a heavy vehicle, the use of technology in the form of visual media does not serve as an adequate substitute for physical, hands-on learning. This kind of experience cannot be substituted.

6.17 In addition to the abovementioned factors, the TWU acknowledge that automation is a technology that many operators show a growing interest towards. With such an increase in autonomous vehicle technology and interest, particularly in recent years, the TWU would urge that the adoption of automated vehicles, or "connected and automated vehicles" (CAVs), within the heavy vehicle space specifically, should be met with extreme caution.

6.18 To summarise the TWU's primary concerns regarding CAV trucks specifically; The long-lasting integration period of CAV vehicles is projected to create on-road complications, and safety hazards. Additionally, the true viability of CAV technology remains questionable. Furthermore, when assessing the "safety" of a driver, the security risks associated with CAVs must be addressed.

6.19 The TWU's concern with CAV technology, in the context of this inquiry, comes from an ever-increasing interest in the development of said technology, and by extension, its adoption onto NSW roads. This much has already been made clear, with there having already been CAV bus trials in NSW.

6.20 The TWU would highlight the subject of CAV technology, as among the other factors associated with the overarching "goal" of CAV technology, part of the picture includes the management of driver fatigue, or rather, creating a safer on-road environment for a driver through various means.

6.21 The "means" in question include facilitating rest and fatigue management, as an autonomous vehicle allows a driver to cease complete manual operation of their vehicle (depending on the level of automation), diverting attention from decision making and analysis of live, on-road variables, such as traffic, hazards, pedestrians, and so on.

6.22 By extension, CAVs are projected to create a safer road environment for not just the operator of the CAV itself, but other road users and pedestrians. To this extent, the promise of CAV success typically boasts improve traffic flow, wider economic benefits, and general safety outcomes that may be considered beneficial.

6.23 Though these are the ultimate intentions of CAV technology, there are significant variables and complications that must be considered. Firstly, though it is commonly peddled that CAVs will bring benefits onto roads, the presentation of said claims typically creates the implication that such benefits will be immediate. Research indicates that this is not the case.

6.24 Indeed, while one of the ultimate goals surrounding CAVs and their integration on the roads is to revolutionise traffic flow, and create a safer environment for road users and pedestrians alike, it is not expected for such an idealistic result to be achieved for a number of decades. This is because for the projected results to be realised, there needs to be a suitable level of

vehicle cooperation.

6.25 The term "vehicle cooperation", in this context, refers to the synthesis of vehicles on the road. An ideal level of vehicle cooperation on the road is only estimated to be achieve once CAV penetration levels are at a high rate; meaning when CAVs have a significant road presence.

6.26 Specifically, an ideal level of CAV penetration would be a percentage where CAVs are equal to, or rivalling the road population of traditional vehicles. Low levels of CAV penetration are deemed to have a negative impact on both traffic flow and road capacity[16], which remains relevant considering that CAV penetration will unquestionably remain at lower levels for years to come.

6.27 What can be described as the "transitional" phase from conventional vehicles to automated vehicles is projected to last many decades[17]. This is important because, as outlined, there are numerous complications that could consequently arise within the transitional phase, when CAV penetration remains at low levels.

6.28 With the proposed safety benefits of CAVs only being at an ideal level once the integration of such technologies is considered to be at a high level of penetration, it is imperative to acknowledge that the safety of drivers on the road, as well as pedestrians, could very well be at risk throughout the decades of overall implementation and development.

6.29 With the development of CAV technology, particularly in recent years, there has also been an increasing interest in CAV trucks on a global scale. There have been instances of CAV trucks malfunctioning, resulting in an incident.

6.30 In 2022, a self-driving truck fitted by TuSimple, a leading autonomous-truck developer, executed an outdated left-turn command from 2 ½ minutes prior, and as a result, cut across the highway and slammed into a concrete barricade[18]. It should be noted that this still occurred even with two employees seated in the truck, with one of them at the wheel, unable to override the controls. It was nothing but a matter of circumstance that nobody was in the way of the truck that would lead to a casualty.

6.31 Other examples of notable CAV incidents, vehicle security breaches, or statistics include, but are not limited to;

- In 2018, a self-driving Uber car hit and killed a pedestrian in Arizona. A federal report revealed the vehicle did not recognise the pedestrian as a jaywalker, and its braking system was not designed to avoid an imminent collision[19]. This occurred even with an operator seated at the wheel.

- In 2022, a self-driving Tesla was responsible for an eight-vehicle crash in San Francisco.

[16] Will automated vehicles negatively impact traffic flow? *Journal of Advanced Transportation*, 2017, pp.1-17.
[17] Ibid.
[18] Self-Driving Truck Accident Draws Attention to Safety at TuSimple. *Wall Street Journal.* Available at: https://www.wsj.com/articles/self-driving-truck-accident-draws-attention-to-safety-at-tusimple-11659346202?st
[19] Vehicle Automation Report. National Transportation Safety Board, 2019.

According to the driver of the 2021 Tesla Model S, the vehicle was in full self-driving mode. An eight-vehicle crash was the resulting incident due to the technology malfunction[20].

- In 2023, a self-driving taxi in San Francisco collided with a Fire Department Truck. The CAV entered the intersection on a green light, however, it failed to yield to the emergency vehicle, which was on its way to an emergency scene. It should be noted that city officials and residents have cited other incidents where self-driving cars have interfered with emergency vehicles, in a plea to slow down the enthusiastic efforts to introduce CAVs on the road[21].

- From a period between July 2021 – 15 May 2022, there were a reported 130 crashes involving full autonomous vehicles under an order by the National Highway Traffic Safety Administration (NHTSA) in the United States of America (USA)[22].

- In 2022, a teenage security researcher remotely hacked into over 25 Tesla vehicles by abusing a bug in an open-source logging tool known as TeslaMate. The researcher was capable of unlocking doors and windows, and starting keyless driving, among other things[23]. Such cases raise concerns into the possibility that a heavy vehicle can also be remotely hacked.

6.32 As mentioned previously, the reception of technology is a key contributing factor towards its success. Typically speaking, heavy vehicle drivers, in the TWU's experience, are hesitant towards the adoption of self-driving technologies in trucks.

6.33 Unsurprisingly, general public perception towards CAV technology is also questionable. A survey into public opinion about connected vehicles in the U.S., the U.K., and Australia bore interesting results.

6.34 Among the numerous concerns outlined, some that remain relevant for CAV technology in heavy vehicles include system security (from hackers), vehicle security (from hackers), system performance in poor weather, self-driving vehicles getting confused by unexpected situations and self-driving vehicles not driving as well as human drivers in general.

6.35 Some key findings from the survey;

- 43.4% of respondents would continue to watch the road, even though they would not be driving.

[20] Helmore, E. (2022). *Tesla behind eight-vehicle crash was in 'full self-driving' mode, says driver.* [online] the Guardian. Available at: https://www.theguardian.com/technology/2022/dec/22/tesla-crash-full-self-driving-mode-san-francisco.
[21] Shakir, U. (2023). *Cruise robotaxi collides with fire truck in San Francisco, leaving one injured.* [online] The Verge. Available at: https://www.theverge.com/2023/8/18/23837217/cruise-robotaxi-driverless-crash-fire-truck-san-francisco.
[22] Summary Report: Standing General Order on Crash Reporting for Automated Driving Systems. *National Highway Traffic Safety Administration*, 2022.
[23] A 19-year-old security researcher describes how he remotely hacked into over 25 Teslas. Available at: https://www.businessinsider.com/teen-security-researcher-describes-how-he-hacked-into-25-teslas-2022-1

- 21.2% would not ride in a self-driving vehicle altogether.

- 51.0% of Australians responded with "very concerned" with riding in a vehicle with no driver controls available, and a further 27.4% of Australian respondents were "moderately concerned".

- 53.0% of Australians responded with "very concerned" and 23.6% with "moderately concerned" when posed with the scenario of "Commercial vehicles such as heavy trucks or semi-trailer trucks that are completely self-driving.

- When posed with the scenario of "Public transportation such as buses that are completely self-driving", 44.1% of Australians responded with "very concerned", followed by a figure of 26.6% for "moderately concerned"[24].

6.36 Additionally, a study released in 2022 summarises that safety, privacy and data security are the three most prominent areas of concern when regarding CAVs in general[25].

6.37 These findings demonstrate a very clear degree of a caution and hesitancy, in general, regarding CAV technology. The attitude of the public towards CAVs will, as it rightfully should, influence how quickly they are actually adopted onto the roads, and by extension, will impact the timeframe in which the proposed benefits of CAVs will be achieved[26].

6.38 As such, for the purposes of future technology and developments in the space of heavy vehicles, it is necessary to note that the perception of said technologies and their adoption is a significant factor that must be addressed. To that extent, consultation with truck drivers, the TWU and industry is entirely necessary to facilitate proper safety practices in this space.

6.39 The TWU would briefly highlight that a particular pressure faced by truck drivers in the transport industry is low job control and, often, job insecurity. As such, the TWU is concerned with the potential of CAV technology to negatively impact the jobs of truck drivers.

6.40 Thousands of Australians within the industry, who remain dependent on the skills they have cultivated in their career, could eventually lose their jobs as a consequence of CAV adoption on NSW roads. In addition to the safety risks, when concerned with the livelihood of working people, particularly on a large scale, it becomes a matter of ethical standing as well.

6.41 In the context of this inquiry, such a possibility is detrimental in addressing the pressures faced by truck drivers, rather than proving beneficial.

## 7. Conclusion & Recommendations

7.1 The TWU would like to thank Portfolio Committee No. 6 – Transport and the Arts for the

[24] Schoettle, B. and Sivak, M. (2014). A survey of public opinion about connected vehicles in the U.S., the U.K., and Australia. *2014 International Conference on Connected Vehicles and Expo (ICCVE)*.
[25] Public concerns and connected and automated vehicles: safety, privacy and data security. *Humanities and Social Sciences Communications*, 2022.
[26] How and why do men and women differ in their willingness to use automated cars? The influence of emotions across different age groups, 2016.

opportunity to contribute to the Inquiry into the pressures on heavy vehicle drivers and their impact in New South Wales in the form of a formal submission.

7.2 From the information detailed in this submission, the TWU would outline key recommendations for the inquiry to consider.

7.3 Key recommendations;

- Acknowledge that the "characteristics" of the heavy vehicle industry denotes a broad range of factors, many of which are relevant to varying degrees.

- Typically, pressures faced by truck drivers are beyond their control. This includes, but is not limited to, pressures from management, economic pressures through remuneration, or external influences like the economy, influencing driver practice. Additionally, the very nature of the industry; limited bargaining power of truck drivers, the prevalence of undercutting, lengthy sub-contract chains, as so on, are all factors that need to be addressed before pinning the blame on individual drivers.

- There needs to be a requirement for an evidence-based progression to competency-based licensing system for truck drivers in NSW. Experience is key, and the necessary, practical knowledge is earned through comprehensive and serious safety training. If issues such as over height truck incidents are to be diminished, then this is undoubtedly the best way of doing so, whilst also cultivating a qualified freight task in NSW.

- In over height incidents specifically, truck drivers should not bear the brunt of the punishment. TWU experience indicates that management is responsible for the training of their drivers, and in many cases, do not commit to maintaining an appropriate standard as they should. This, of course, should be considered in conjunction with the various other pressures truck drivers face on an internal level.

- HVRA strategies need to be completed in direct consultation with industry and the TWU to address the various matters associated with the current state of HVRAs across NSW. As outlined, this includes –

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

- Acknowledge that the aged workforce in transport may be hesitant towards the adoption of certain technologies, for various reasons. The successful adoption of technology, and subsequently, the success of the technology in practice, is dependent on reception.

- By extension, one particular technology to note specifically is CAV technology. Though it is emerging, and promises much, the information detailed prior must be taken into consideration if interested in the adoption of CAVs on NSW roads.

- Generally speaking, consultation with industry and the TWU should be standard when proposing changes of any kind, particularly relevant to the elements covered in this submission.

7.4 The TWU have always had the best interest of truck drivers and the wider transport industry in mind, and will continue to fight for a better future in the industry. As such, the TWU sincerely believe the information detailed in this submission, and the recommendations outlined, will only serve to benefit both the outcomes of the inquiry, as well as the future of truck drivers in NSW.

7.5 This inquiry is a necessary step forward, given the opportunity to critically assess the root cause of over height incidents, as well as other pressing matters such as fatigue management practices, the current state of HVRAs in NSW, as well as the general characteristics and subsequent pressures within the heavy vehicle space that ultimately plague the lived experience of truck drivers looking to complete an honest day of work.