



8 May 2018

Ms Melissa O'Brien
Manager - Productivity, Safety and Environment
National Transport Commission
Level 3, 600 Bourke Street
Melbourne VIC 3000

Dear Ms O'Brien

I am writing to you in your capacity as the Project Manager for the Austroads project on developing guidelines for the provision of heavy vehicle rest area facilities.

The Australian Trucking Association is strongly disappointed in the combined approach of governments to improve heavy vehicle rest areas (HVRA) and lack of priority it places on safety and addressing fatigue for drivers.

Road freight is an enabler of opportunity, allowing businesses to reach domestic and international markets, consumers to purchase goods, farms to sell their produce, and construction materials to enable new developments. This is particularly critical to supporting jobs and economic growth in rural and regional communities.

It is absolutely essential that we have the infrastructure to support this task. We need road infrastructure to connect communities, and road infrastructure that is safe. Having appropriate rest area facilities for heavy vehicles is not optional, it's not a nice to have, it is a fundamental requirement and obligation for road providers and government.

The ATA is disappointed in the proposed guidelines and have little confidence that governments would enact them even if they addressed the issue adequately.

The ATA believes that access to toilets, lighting and water are a basic human right. Office workplaces, including for the ATA and government agencies, would not compromise on the provision of these basic human rights. Yet the proposed top level HVRA classifications only list these as desirable. The ATA strongly recommends that level one and two of the HVRA classifications should mandate the provision of toilets, lighting and water as a minimum requirement.

Our roads and rest areas are a drivers workplace, and we have little chance of resolving fatigue if we are not providing drivers with basic human rights to get the job done of moving goods to homes and businesses.

The ATA would recommend a stronger recognition of the higher levels of service available to drivers from commercial facilities, and those in urban and regional centres, and the continued development of HVRA in this context should be strongly encouraged.

In terms of desirable spacing, it is not legally possible for a heavy vehicle to travel 100km within one hour. The maximum desirable spacing (table 4.1) should be no more than 80km. Considering log books have 15 minute intervals, there is a strong argument that governments should provide HVRA's to some standard every 20km, so drivers can comply with the rules.

The ATA welcomes the guidelines attempt to place the primary weighting factors in determining HVRA locations on addressing safety and fatigue. However, this must be a stronger focus. Suggestions that HVRA should consider the provision of electric vehicle charging stations or points of interest for other road users ultimately risk the need to address heavy vehicle safety and fatigue. This is too important to risk being watered down by other factors, HVRA must focus on addressing safety and fatigue.

The guidelines should include minimum requirements for allowing vehicle configurations. B-double configurations should be the minimum, with clear preference for allowing HPV / A-double / PBS level 3 configurations on appropriately gazetted routes (also considering the need to expand the gazetted network).

The ATA would also strongly recommend that the guidelines state that road agencies should not temporarily close HVRA for the storage of materials for roadworks. HVRA are for addressing fatigue and safety, not roadworks. These types of temporary closures of HVRA show a complete lack of respect and disregard for the safety needs of heavy vehicle drivers.

Additionally, there should be no general and caravan camping in any HVRA, and this must be enforced.

In key exchange areas, the ATA would also recommend the provision of coupling/uncoupling areas adjacent to the HVRA (but not within).

We welcome the inclusion of informal HVRA, and specifically acknowledge Rod Hannifey's tireless advocacy on this, but have concerns about the language recommending monitoring to maintain or downgrade informal HVRA locations. The priority should be on increasing rest areas, to combat fatigue.

On consultation, the ATA is disappointed in the consultation timeframe and the apparent lack of driver input. Ultimately drivers are the users of these facilities and should be consulted as a priority. A report on the survey should be provided, including the number of responses.

Additionally, the ATA recommends that specific engagement of women drivers should be undertaken on the provision of toilet facilities at HVRA locations, and on whether these should be unisex or gender specific.

Ultimately, the decisions and responsibility for the provision of HVRA are a matter for road agencies and governments. There should be a strong set of guidelines and HVRA strategies for the provision of facilities, an independent audit on the current state of HVRA and whether they meet this standard, and then a funded national plan from governments to address the gaps. This should include identifying the number of HVRA which currently exist, and the number of new investments required to provide a HVRA network which is serious about safety and addressing heavy vehicle driver fatigue.

Governments audit the safety of vehicles through registration, enforcement and other measures, and they should bring this same level of focus to the safety of road infrastructure and provision of HVRA.

This report does not go far enough to acknowledge the need to treat heavy vehicle operators with respect, nor the important link that these basic amenities have on safety and the general wellbeing of drivers.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ben Maguire', with a stylized flourish at the end.

Ben Maguire
Chief Executive Officer