## **Bryce Regnier**

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I would like to put forward a submission to the Heavy Vehicle National Law review.

The issue of vehicle standards with regards to fatigue management could be written into law to negate interpretations by heavy vehicle operators with vehicle specifications for overnight / long haul drivers.

Currently companies have no legal obligation with vehicle spec in relation to sleeper birth size / dimension or cabin comfort equipment fitted.

Most will purchase based on price and safety features alone.

Too often drivers are asked to sleep overnight in trucks that are barely large enough to lie on their side, with regards to fatigue this is a seriously under studied factor in driver fatigue.

Given we can regularly be subjected to temperatures below zero to as much as 45 plus degrees Celsius, it would be neglectful to not at least legislate a minimum cabin spec for all trucks required to be slept in for one or more nights.

My submission would ask for a legislated minimum bed size of 60 cm measured from behind the drivers seat along with cabin refrigerated cooling powered separately from the vehicles electrical system.

With this in place we would then see more attention by both manufacturers and industry put into driver comfort rather than driver safety.

A recent example to qualify this argument is Volvo trucks, the previous FH16 was 10cm wider behind the driver than the current new version. This was done to give the driver more leg room.

Understandably this will have an impact in Australia and North America where drivers want the bed space larger, the current cabin is taller than the earlier version as well to accommodate getting changed etc more easily.

Being able to sleep comfortably is a human need, one only has to see all the sleep apnoea studies coming through to see how poor sleep is as much a health issue as is fatigue.

Please feel free to contact me for more clarity on this important issue.

**Thanks** 

Bryce Regnier