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How can we change our approach to fatigue management so we reduce fatigue-related incidents and deliver Australia's road transport task efficiently and safely?

To effectively manage fatigue there should be a focus on allowing drivers the opportunity to drive when they're not fatigued. I have spent several evenings bound by a major rest period, not being able to drive home, waiting for 3 or 4 hours at times. This meant that instead of leaving at a reasonable time and getting home to my own comfortable bed by say 4am, I was waiting, then driving all night, getting home at 9 or 10 am, then not being able to achieve a proper restful sleep. This issue would snowball until I was too tired to continue, missing out on days pay so I could rest.

Allow drivers the opportunity to drive more during hours they'd usually be awake, say until 11pm. Allow drivers to work more time during the day, and balance it out with longer rest periods during dark hours

What fatigue risks that are currently out of scope for the HVNL should be brought into scope? What is in scope that shouldn't be?

Currently the fatigue management rules encourage fatigue, by not allowing drivers the opportunity to drive when they are not fatigued, but then forces them to wait and drive fatigued

What are the key risk factors associated with long hours, night shifts and other work schedule factors? How do we account for the fact that not all work hours have the same risk without introducing excessive complexity?

A maximum of 12 hours working time a day. However it works, in any order, with the current 2 days off in a fortnight

How should a new HVNL address driver health and lifestyle factors? What kinds of controls could be effective?

How do we ensure the HVNL is agile enough to adopt best practice fatigue management as it emerges? How do we encourage continuous improvement? Can training help?

Training of fatigue factors could help. A maximum 12 hours in a day regardless of what blocks those hours are worked in. Allow drivers to leave departures earlier to allow them the opportunity to get proper rest in their own beds

How can we better accommodate emerging technologies? How can the new HVNL get the best value from technology and data? Do you think fatigue monitoring technology can supersede work and rest hour requirements?

Electronic work diaries would help, but these need to allow all rest/work time to be counted by minute, rather than 15minute blocks

How can the new HVNL meet the needs of all Australian states and territories? What should the new HVNL adopt from Western Australia and the Effective fatigue management: issues paper May 2019 10 Northern Territory, other transport modes and other industries' fatigue management approaches?

Are prescriptive rules desirable in a new HVNL? If so, how can we simplify rules in the HVNL to make them easier to understand so that they're easier to comply with?

Would the compliance options described in section 4.5 be a more effective approach to regulating fatigue management? If so, what should be included in the new HVNL, its subordinate documents, or elsewhere, such as in work health and safety laws? How would the appropriate fatigue management option be allocated to an operator – by self-selection or other means?

Should the new HVNL give operators the option of taking full responsibility for risk management? What would be the roles of the regulator and roadside enforcement in such a system?

This would be dangerous for drivers, with companies pushing them harder

How can we get the best overall value from a compliance and enforcement strategy for fatigue management? How are scarce resources best allocated, and what tools do regulators need? What provisions in the law do operators need?

What else would you like to tell us about effective fatigue management?