

We operate under BFM and for WA trips AFM to give our drivers as much flexibility as possible to work when they are fit to drive and sleep when they need to within the current systems available, but it is still not as responsive as we would like.

We acknowledge that the work we do has inherent risks involved, long distance general and over dimensional freight Australia wide to regional rural and remote Australia with a number of risks and challenges including, long time away from home base, remote areas often with wandering animals especially at night, john and jane citizen who haven't done the safety induction and consider big trucks an impediment to their own aspirations.

Apart from the BFM and WA Workcover fatigue training we talk lots (personally, in COMEMO's and training days) with drivers about fatigue, circadian rhythms, fatigue triggers, how it works, how to recognise it and safely manage it and our expectations that they MUST be safe on the road for their own sakes, their families, the company and of course everyone else who uses the roads and are impacted by our operation.

Countermeasures to fatigue we use:

- We only accept freight based on legal and safe operation. No exceptions
- Responsible schedules and rosters specific to individual drivers so that drivers, families and freight can be managed in each circumstance
- More permanent drivers than prime movers and a pool of irregular casual drivers so that the above can be responsibly managed and everyone knows it can
- Continuing conversations between Operations and Drivers both on the road and in anticipation of it
- Mandatory company requirement to take a break every 2 – 3 hrs to stretch, walk around, kick tyres, check the load and get some air into the lungs (not included in work diary unless in excess of 15 minutes)
- 7 hour sleep to be taken between 10pm and 8am whenever it works best for the driver and their individual patterns (NB: many more operators are doing something similar now and rest areas are struggling with extra numbers as well as many not being suitable in length or access in and out for B doubles and floats and dollies and rarely signed to say 'Not suitable for B doubles' which can mean frustration and unnecessary damage and no rest

I guess the main comments we want to make are:

- CoR where all people in the chain are responsible for what they are part of and contribute to is morally correct and responsible and smaller operators are over larger operators (as in very large) still trying to contract their way out of their responsibilities and assuming small operators aren't responsible (despite multiple accreditations) expecting operators to duplicate their management systems off site (as in their own systems) at the expense of the smaller operators
- One size doesn't fit all (systems, tasks, expectations) and even similar sized operations carry different freight in different areas with different timetables customers road surfaces and quality and a whole host of expectations not to mention individual drivers and their own body clocks, capacity to plan, physical fitness levels and even sense of self, personal freedom and maturity to make the decisions they need to keep them safe on the road.
- At the end of the day an operator can do our best to provide the optimum opportunity for safety, but it is still up to the driver to make the responsible choices and decisions to manage their health, well being and operational environment behind the wheel.

- There needs to be a choice for a simple prescriptive system for those operators who will say 'just tell me what I have to do, and I'll do it'
- BUT those operators who want a system which is responsive to their needs and those of their drivers should be able to have one. AFM with some more responsive elements could be this
- Acknowledgement that a 'fit for purpose system' will be different in different operations
- Drivers need a system of recording time which is real e.g. a 15minute break recorded from start to finish no matter the time should be acknowledged instead of having to try and fit it in quarter hour boxes like we do in the current work diary which is got rounding up and down rubbish
- Current work and rest hours are complex, confusing and easy to muck up and hang drivers out to dry with overzealous roadside enforcement (more likely to be highway patrol than the likes of Vic Roads etc)
- Road surfaces and the poor maintenance of roads is part of the transport chain and contribute unnecessarily to fatigue damage to equipment and premature wear of components in spite of robust and proactive maintenance systems and yet the road authorities aren't included under CoR Crazy!