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**Josie Thomas**

Principal Policy Advisor  
National Transport Commission  
Level 3/600 Bourke Street  
Melbourne, VIC, 300

8<sup>TH</sup> May 2025

Dear Josie,

**Re: National Transport Commission Project – Improving Health Screening for Heavy Vehicle Drivers**

Thank you for the opportunity to respond to the NTC March 2025 Discussion Paper on improving screening protocols for sleep apnoea, diabetes, and cardiac risk factors in heavy vehicle drivers.

Linfox acknowledges the high incidence of chronic medical conditions among heavy vehicle drivers and the associated safety risks. We support the prescribed screening for cardiac risk factors, diabetes, and sleep disorders as outlined in options 1C, 2C, and 3C of the Discussion Paper.

While we fully support this project, we recognize the following challenges with the introduction of periodic health evaluations:

- Cost of screening assessments
- Medical resourcing constraints, especially in rural areas
- Complexity in rostering systems due to case management of drivers undergoing medical reviews

Linfox endorse the Australian Logistics Council (ALC) recommendation that:  
*non-regulatory education and preventative screening programs, led by trusted organisations such as Healthy Heads—be supported alongside any changes to AFTD or medical screening obligations.* We also endorse the expansion of the Healthy Heads in Trucks & Sheds on-road health check initiative.

Overall, Linfox is committed to a practical and risk-based approach to enhance the health and wellbeing of heavy vehicle drivers, thereby increasing safety for all road users.

Yours sincerely,

**Doug Fryer**

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