

SUBMISSION TO PARLIAMENTRY ENQUIRY INTO MANAGING FATIGUE IN TRANSPORT

My comments come from my own observations and experience and wish to have the following input into the enquiry into managing fatigue in transport.

As the enquiry is dealing with the issue of fatigue across the whole gamut of transport which is a logical and obviously highly desirable approach, the persons involved with formulating the scope, must be commended for their thoughtfulness.

The areas that I wish to comment on are:

- **Quality of Any Proposed Legislation**
- **To Embrace a Common Philosophy and Principles for all Forms of Transport**
- **Duty Time Requirements and Considerations**
- **Address Firmly the Problem and Effects of Alcohol, Drugs and Smoking**
- **Health and Sickness**
- **Defence Force Responsibilities in Civil Areas**
- **Ensure Compliance and Enforcement of Regulations**
- **Foreign Tourists/Visitors**
- **Education and Training**
- **Training for Emergencies**
- **Responsibilities of Manufacturers and Designers**

Quality of Any Proposed Legislation:

Ensure that plain English with no ambiguity and no complex interpretation is required. (For an example, past and some current regulations of the Civil Aviation Safety Authority leave much to be desired.

To Embrace a Common Philosophy and Principles for all Forms of Transport:

For example, duty time, rest periods and refreshment requirements should be recognized across the full spectrum of employees, although grading would no doubt be necessary according to stress, complexity of work, environment, and work outside normal hours. Also ensure that when there is an employer involved, that the employer shoulders his/her responsibilities accordingly. This also applies to manufacturers and designers regarding their responsibilities from an ergonomic and safety aspect. (It would be interesting to find out how many road vehicles comply exactly with the Australian design standards.)

Duty Time Requirements and Considerations:

Many industries now have their employees on shift work working shifts of twelve (12) hours duration. It is then not uncommon at all, to be required to work additional hours as overtime. The high capacity regular public transport aviation industry is a classic example. These employees in most instances, get into their cars, or on their motorcycles, and drive home taking 30 to 40 minutes on high speed freeways in some cases. My son working for the Navy wrote a car off under these circumstances except he was only some several minutes from home.

Pilots, not infrequently, exceed their duty time but at least there is some control in this area.

Address Firmly the Problem and Effects of Alcohol, Drugs and Smoking:

With the number of accidents occurring causing massive expense to the community, the disruption on peoples lives, the people that are left maimed and incapacitated is appalling.

It is therefore recommended;

- that any person involved in an accident should be required to undergo testing for drugs of any form that is likely to cause impairment,
- should a positive indication result, a follow on investigation should be made to assess whether the person is reliant or addicted however mildly. If addiction is found, the person must undergo a rigorous and thorough detoxification and rehabilitation. Again, no half-hearted measures. Without adequate rehabilitation, the exercise would be farcical.
- The old "Eight hours from bottle to throttle" espoused by flight crews as being satisfactory is rubbish. Some drink quite excessively and would definitely register with a blood/alcohol test. "Beer guts" on truckies is legendary and then its into the stay awake pills.
- Research should be conducted on the effects and impairment of smokers in relation to work/driving/piloting. Just as an individual, I have witnessed irrational irritability and mood swings when people have not had a cigarette for some time. This must surely impair their decision making ability. Caffeine in excess is another substance that causes mood changes.

Health and Sickness:

- An ongoing educational program via the media, possibly targeting the cold/flu and allergy times of the year to alert people to the hazardous and impairing effects of some drugs, and that the effects can differ from person to person.
- Adequate recovery time from illness and not working/driving/piloting when suffering from a debilitating ailment. The macho, "she'll be right mate" attitude is very alive and well. The medical profession should be more aware and proactive in dealing with this aspect. In fact the medical profession are not particularly active in public education at all.

Defence Force Responsibilities in Civil Areas:

- The various ranks in command are known to issue some pretty stupid orders, all in the name of pushing their troops to the limit. This may serve some purpose in training, but not on public roads please. For example, being on duty for some hours loading or whatever and then driving without proper breaks and rest periods for hours. Even worse, when the officer giving the orders wants to get home early for personal reasons.

Ensure Compliance and Enforcement of Regulations:

- No one wants a "police state" but notably in the Northern Territory there is a distinct lack of police presence. The attitude is improving, but distances are frequently measured in the number of "green cans" consumed in travelling from A to B.

Alcohol is seen frequently being consumed while driving. Beers on the boss Friday afternoons is another problem.

- The employers who push their employees beyond safe limits and to take ridiculous risks, should be dealt with extremely harshly,
- The irresponsible actions and the ignoring of duty of care relating to drugs and alcohol, on the part of an employee should be dealt with harshly,
- The Government, both Federal and State/Territory should institute a permanent educational program that begins in the early years of schooling to instill the responsibilities and duty of care each and every individual has in society.

Note: No band-aid, superficial, pussy footing around and window-dressing stuff.

Foreign Tourists/Visitors:

- Ensure foreign tourists understand the problems of driving on the "wrong" side of the road and how the mind will carry out an automatic response not appropriate to our right hand drive, left-hand road system. This obviously is an ever increasing problem when fatigue sets in after many hours of driving. They have little concept of the distances involved in this country. The car rental companies will confirm the high number of accidents incurred by foreign tourists.
- A similar difficulty occurs with foreign pilots with English required to be spoken in international airspace. Often fatigue and/or an emergency situation arises and they revert to their mother tongue.

Education and Training:

- Far more education and training is necessary, both in the work carried out and the responsibilities involved. Managers especially, and going down the chain of command should be made acutely aware of their responsibilities over and above returning a profit.

Training for Emergencies:

- Training for emergencies involving travelling, particularly on public transport (or public places for that matter), should be started in kindergarten and proceed right through the students schooling and if applicable, university years. I believe it is essential in this day and age of complexity that early training for emergencies, instills in the sub-conscious mind the required actions or reactions to emergency situations. This would aid enormously in the survivability of a person or numbers of persons where an emergency is occurring. It gives them an appropriate set of "tools" to use, reduce the "freeze up" fear all too often produces, or the irrational actions of "flight" and panic. Tiredness and fatigue exacerbates this problem.

Responsibilities of Manufacturers and Designers:

- Responsibilities of manufacturers and designers from an ergonomic and safety aspect. This problem seems to be totally ignored regarding imported cars. Citing an example, many of the current utilities on the road have totally inadequate design regarding people even moderate height 170 cm (5ft 7") and taller. I am 173 cm in height with normal proportions, and with the seat right back, I must drive with my knees well apart and still they foul the steering wheel. The sitting position is bolt upright and very tiring driving for long periods of time. A taller person I know,

around the 186 cm dreads having to drive the long distances involved with his job carrying out aerodrome inspections. He is not only fatigued, he his almost crippled with the cramped sitting position enforced by poor design.

- Loud music. Has any research been carried out as to whether extremely loud music causes any debilitation or effects of concern regarding a driver capability? Surely the high noise level would over-ride any aural warning signals or horns at the very least.

-oOo-