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**Submission**

***Strategic Regional Integrated Transport Plans***

*7/08/2024*

**Transport Workers' Union of New South Wales**

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# Transport Workers' Union of NSW

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## 1. Summary of Recommendations

1.1 The *Strategic Regional Integrated Transport Plans* (SRITPs) consultation is a strong opportunity to advance the provision of transport services and networks in regional areas of NSW. However, in addition to user feedback, the perspectives of the transport workers conducting these critical tasks must also be accounted for.

1.2 Below is a summary of the TWU's recommendations, observations and insights, for the consideration of the NSW Government.

- Buses, as a mode of public transport, should be afforded an equitable budget in comparison to other modes of transport.
- A focus on the lived experience of bus drivers should remain a key policy priority in regional transport planning. This includes the facilities and amenities that are available to them, and the condition they are in.
- Treating the revision of regional speed limits as a primary solution to road trauma will prove limited in its effectiveness. Factors such as fatigue and behaviour must also be addressed. In the case of truck drivers, heavy vehicle rest areas (HVRAs) are crucial for safety. The NSW Government should consider development of further HVRAs in NSW's regions, and work with the TWU to identify geographical gaps in the network, among other elements.
- Variable road conditions remain a regional challenge that should be addressed. Regular assessment and maintenance of regional roads, particularly those frequented by heavy vehicles, may prove plausible through the establishment of a program or body for monitoring said roads. Truck drivers who travel these roads may provide valuable feedback and guidance based on real-world experience.
- The NSW Government should consider engaging the TWU, as the representative of NSW's heavy vehicle drivers, in any future plans or initiatives regarding road safety across the board, and particularly in NSW's vulnerable regions.

## 2. About the TWU

2.1 The TWU represents tens of thousands of people in Australia's road transport, aviation, oil, waste management, gas, passenger vehicle and freight logistics industries.

2.2 With over one hundred years' experience representing the workers who conduct Australia's crucial passenger and freight transport tasks, the TWU has been proactive in advocating for the establishment and improvement of industry standards which advance the lives and safety of transport workers, their families and the community at large.

## 3. Introduction

3.1 The TWU welcomes the opportunity to contribute to the SRITPs consultation. In addition to delivering greater transport services and networks for the public, this *Have your say* provides



an important opportunity for the voices of transport workers to be heard.

3.2 Through its long-standing history of representing transport workers, the TWU is uniquely positioned to provide unique perspectives that may otherwise go unconsidered. Though the SRITP initiative demonstrates a focus that is primarily geared towards the feedback of passengers, the TWU believes that the facilitation of greater transport services and networks is equally subject to the experience of workers.

3.3 Discussion of issues and suggestions will be posed as a generalised matter; not focused on only one specific region available for selection through the *Have your say* portal. Many of the industry elements this submission will cover are universally applicable, and all regions in the scope of the consultation may see benefits in consideration.

#### 4. The Provision of Public Transport Services

4.1 Buses prove to be a heavily-utilised mode of transport by the broader public, yet remain under-invested towards by the NSW Government – receiving (up to) roughly 3% of the transport budget spend, in comparison to other modes<sup>1</sup>.

4.2 Financial Year 2022 – 2023 saw bus patronage boast about 41.9% of the total public transport trips in the state; overall, this figure is not overwhelmingly lower than that of hard rail<sup>2</sup>. As such, it can reasonably be concluded that the current, disproportionate spend afforded to the bus task is inequitable, and is a fundamental stressor to the struggles of this critical transport sector.

4.3 Such a discrepancy alone should warrant a reflection on transport budget allocation, even if it were absent of further detail. However, in addition to the financial figures, there are practical elements that must be considered; elements that remain lived experiences for bus drivers on a daily basis.

4.4 In the TWU's representation of its members, bus drivers are often subject to any, or a combination of, the following experiences on a daily basis.

- Limited job control and decision-making abilities
- Allocation of poorly resourced bus routes.
- A need to skip bathroom breaks (attributable to multiple influences, including driver shortages, run times, and a lack of facilities / access to facilities)
- Abuse from passengers, ranging from verbal, all the way to physical in the worst of cases.
- Poor conditions and unreasonable demands across the board, including excessive working hours and lack of balance and flexibility.

<sup>1</sup> Portfolio Committee No. 6 – Transport and the Arts. 2024. Examination of proposed expenditure for the portfolio area.

<sup>2</sup> Transport for NSW Annual Report. Volume 1 | 2022 – 23. *NSW Government*.



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4.5 Almost all of the elements listed above find their root in the aforementioned lack of funding. However, there are other contributing factors, and subsequently, further stressors that serve to exacerbate these issues.

4.6 Decades of declining workplace standards led to the TWU launching a campaign called *Road to Respect* in 2023 – which focuses on highlighting the conditions in the industry, and aims to give bus drivers a powerful voice. Bus drivers play a crucial role in NSW's communities, and the TWU has consistently advocated for much-needed industry improvements in working conditions for these essential workers throughout the state.

4.7 Road to Respect was launched in unity with TWU members at Charles St Parramatta, where hundreds of bus drivers who come through daily were expected to share two port-a-loos, which were rarely cleaned, if at all. Beyond the TWU's own observations, the issues regarding facilities have been officially recognised as a widespread issue in the NSW Bus Taskforce's First Report.

*"It is unacceptable that a bus driver cannot access a clean and well-maintained toilet or meal facility, either because one does not exist, or access is limited, or because the schedule does not give the driver sufficient time to use it."*<sup>3</sup>

4.8 Furthermore, the Taskforce makes the following recommendations on the facility challenges faced by the industry.

- Transport for NSW, operators, the workforce and unions audit the availability and quality of driver facilities at depots and at layovers and other stopping places, and then consider ways to support improvements.
- Transport for NSW consider establishing a Bus Facilities Fund, funded from any contract abatement payments made by bus operators over (the) next three financial years, to be applied to improving/maintaining facilities.

4.9 Effectively, the TWU raises these issues as much like the collective Taskforce, the TWU aims to spotlight and resolve the deficiencies that impact bus drivers daily, and believes that it is necessary to bear these considerations in mind when conducting any manner of transport planning. The TWU also notes that facilities may be a unique challenge in regional areas, due to long routes, and fewer facilities in general. In the TWU's experience, bus drivers in regional areas and beyond Sydney in general still echo the same sentiments as their metropolitan counterparts.

4.10 The TWU would urge Transport for NSW to bear the experience of bus drivers in mind when it comes to regional transport planning, as their experience will ultimately influence the outcomes of public transport tasks. Further consultation is recommended.

## 5. Road Transport

5.1 There are unique challenges and road hazards in regional environments compared to

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<sup>3</sup> NSW Bus Industry Taskforce – First Report (2023). *Transport for NSW*.



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metropolitan areas. In the context of heavy vehicles, variable road conditions, and general wear and tear, are significant topics of discussion, as trucks in totality contribute to road wear to a greater degree than standard passenger vehicles. However, the way in which heavy vehicles are directly affected by existing road wear should also be a key consideration.

- 5.2 Variable road conditions remain a pressing challenge in regional areas. The regions may have poorly maintained or unsealed roads, which can be difficult to navigate and can lead to damage to vehicles, in addition to creating hazardous conditions for drivers. Real-world scenarios have demonstrated that road wear is a genuine danger not just for passenger vehicles, but heavy vehicles in general.
- 5.3 Unsurprisingly, academic literature has also reflected this fact, with peer reviewed papers acknowledging that vehicle collisions are influenced by environmental conditions, traffic characteristics, driver behaviour, and road characteristics. Additionally, it has been noted that road characteristics actually influence both driver behaviour and traffic phenomena, and in turn, is gaining more attention as a subject of academic review<sup>4</sup>.
- 5.4 In 2022, fatalities on regional NSW roads comprised 68.3% of the state's total. This figure is alarming enough in isolation, but in context, it is especially so, given that about one-third of NSW's population lives in the regions. 68.3% translates to roughly two-thirds of NSW's total road toll; a stark figure when assessed alongside population data<sup>5</sup>.
- 5.5 Historically speaking, speed limits have often been the issue of discussion when assessing the "why" behind regional road trauma, as the limits are generally higher than metropolitan areas. The likelihood of a crash being fatal, rather than non-fatal, or just occasioning injury, is increased with higher speeds; therefore, many who tackle regional road trauma highlight speed limits as a key contributor that may need reform.
- 5.6 Though it is a commonly pitched solution, the TWU would emphasise that merely addressing speed limits will be limited in effectiveness. On top of speed, road surface conditions are acknowledged as a contributor to regional road trauma, in addition to further elements such as fatigue and driver behaviour<sup>6</sup>.
- 5.7 For context, road transport is an industry that is considered one of, if not the deadliest industries in Australia. Fatigue is a serious issue that plagues the industry, where drivers are expected to work harder and faster to put food on the table and keep a roof over their heads. It is a space where remuneration, and the demands of wealthy clients at the top of the supply chain, control all outcomes.
- 5.8 A comprehensive Australian literature review on the connection between remuneration and truck driver safety outcomes determined that truck drivers are a vulnerable workforce. The review describes truck drivers as "price takers" rather than "price setters", due to a range of complicated factors, including:

<sup>4</sup> Hidayat, E., Lange, D., Jurji Karlovsek and Kim, J. (2023). Variables Affecting the Risk of Vehicle Collisions in Australian Road Tunnels. *Journal of Road Safety*, 34(4). pp.20-30.

<sup>5</sup> Regional Road Safety (2023). *Audit Office of New South Wales*.

<sup>6</sup> Factsheet: Regional Road Safety. *National Road Safety Strategy*. <https://www.roadsafety.gov.au/nrss/factsheets/regional-road-safety>



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- The limited bargaining power of truck drivers
- Prevalence of “undercutting” to win work
- High capital costs of entering the industry
- Lengthy sub-contracting chains
- Large clients in small numbers
- Tendering processes with little to no regard for the safety of the transport task
- Efficiency, and by extension, price gains reaped by the few large dominant companies in the industry<sup>7</sup>.

5.9 What this means in context of this consultation, is that addressing regional road safety from a heavy vehicle perspective is a nuanced and complicated task, that should prioritise aiming at driver fatigue. One recommendation that will contribute to the overall solution, that is universally agreed upon by industry, is the creation of more HVRAs on the road network – with this being even more relevant in NSW’s regional areas, given the broader geographical spread and distance of journeys.

5.10 In the past, the TWU has conducted research in the form of member surveys, interviews, physical inspections and data analysis on NSW’s HVRAs. In 2020, the TWU conducted in-person assessments of various HVRAs along major freight routes in NSW. These included:

- Hume Highway
- Pacific Highway
- Great Western Highway
- Castlereagh Highway
- Mitchell Highway
- Sturt Highway
- Newell Highway
- Federal Highway
- Princes Highway

5.11 Additionally, the research conducted surveyed a total of 269 workers. 172 HVRAs were

<sup>7</sup> Mooren, L., Williamson, Ann and Grzebieta, R. (2015). Evidence that truck driver remuneration is linked to safety outcomes: a review of the literature. *Transport and Roads Safety (TARS) Research*.



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included as part of this study, and of the 172, 51 were either inaccessible, unable to be located, or otherwise not assessed. Once completed the TWU's research produced interesting results:

- HVRAs with bathroom facilities were often poorly maintained, had no soap, no hand drying facilities, no sanitary bins or sharps disposal containers and smelt strongly of urine and faeces.
- The TWU observed evidence that drivers often resort to living faeces, urine and toilet paper on the ground at HVRAs where facilities are not provided (or where they are in poor condition), and also on the ground between HVRAs where there is nowhere else to go.
- There was a lack of appropriate sanitary bins in (then) current bathrooms and lack of dedicated female bathrooms across the network, despite a growing number of female transport workers.
- Only 11% of HVRAs provided drinking water. Rainwater tanks were commonly used across the network, but these were often empty and unable to be used.
- A large proportion of HVRAs contained rubbish bins and places to leave rubbish, however, these were often observed full or unused.
- Adequate lighting was available at only 31% of HVRAs. Half of the inspected HVRAs had well maintained tables and benches. These were often the only source of shade available to drivers at locations where there was a limited number of trees.
- Only 13% of HVRAs inspected had security features of any kind, including CCTV or security staff.
- Light and heavy vehicles were structurally separated in only 22% of inspected HVRAs. In these HVRAs, it was observed that light vehicles (often with caravans and trailers attached) were using dedicated heavy vehicle parking spaces 12% of the time.
- A number of HVRA locations had discarded needles. This presented an obvious risk to the health and safety of workers, and serves to demonstrate the unkept condition of the areas.

5.12 The study also observed the attitude of workers towards HVRAs, and what kind of impact the condition of HVRAs had on drivers. Listed below are various statements gathered from heavy vehicle drivers under the study.

- *"I'm unable to rest properly on long routes."*
- *"I have to work my trip out and know when I'm going to stop... it annoys the hell out of me when I can't stop because it's full of caravans... there's not another rest stop around the corner."*
- *"It causes frustration, anxiety, health issues, stress..."*





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- *“... makes you keep driving (Unkept HVRAs) ... and that isn't fair. We deserve places to stop, rest, wash and go to the toilet.”*
- *“On such large distances, sometimes us humans need a break. That's all. Somewhere to stop.”*
- *“We are supposed to be professional drivers, but we have inadequate facilities. Where do our taxes go?”*

5.13 Currently, there is still an unacceptably high number of poor HVRAs that do not allow workers to rest well. Addressing this should be a priority in regional transport planning. The idea that all workers deserve a proper break should be reason enough to campaign for the improvement of HVRA facilities, but they also prove to be necessary for the fatigue management of drivers.

5.14 HVRA strategies should be completed in consultation with the TWU and industry, and consider the following matters for the entire NSW HVRA network:

- The volume of traffic and the available number of rest opportunities.
- The number of HVRAs, where they are located and their classification.
- Opportunities for new HVRAs to be developed where gaps exist.
- How HVRAs will be constructed and who will be responsible for their maintenance.
- How HVRA opportunities are communicated to workers.
- The use of HVRAs by light vehicles and holiday-goers.
- Potential needs for upgrades and expansion of HVRAs for future industry developments – such as low and zero emissions vehicles (LZEVs), etc.

5.15 Surface conditions, as mentioned previously, is another variable that deserves attention. However, geographical factors may prove to be a challenging element when aiming to address variable road conditions. Regular assessment and maintenance of roads may be possible through the establishment of a comprehensive program for monitoring and upholding the condition of roads, especially those that are frequented by heavy vehicles.

5.16 Due to the difficulty in consistently monitoring road conditions in regional NSW, the TWU would recommend a program or body purposed to monitor regional roads and heavy vehicle passages, with the TWU, truck drivers and industry members serving to advise the NSW Government on key issues, as well as specific areas of interest. As the workers who travel said roads, truck drivers would be able to provide constructive feedback and suggestions based on real-world experience.

5.17 In 2024 so far, the majority of documented road incidents involving a truck in NSW have occurred in the regions (or outside of Sydney), and the overwhelming majority of fatal



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incidents have likewise occurred beyond Sydney, in greater NSW. The TWU is deeply concerned by this, and remains passionate in highlighting heavy vehicle road trauma, and working with Government and industry to shape better outcomes for the future.

- 5.18 Based on the TWU's monitoring of documented crashes so far this year (at the time of writing), there have been at least 30 fatal crashes in NSW that involve a truck, and almost every single one of those incidents occurred beyond Sydney. In totality, there have been at least 45, if not more, truck crashes in NSW. To put this into perspective, based on current figures, roughly 66.7% of truck crashes have resulted in at least one fatality.
- 5.19 The NSW Government should consider engaging the TWU, as the representative of NSW's heavy vehicle drivers, in any future plans or initiatives regarding road safety across the board, and particularly in NSW's vulnerable regions.

## 6. Conclusion

- 6.1 The TWU would like to thank the NSW Government for the opportunity to contribute to the SRITPs consultation. Below is a summary of the TWU's recommendations, observations and insights, for the consideration of the NSW Government.
- Buses, as a mode of public transport, should be afforded an equitable budget in comparison to other modes of transport.
  - A focus on the lived experience of bus drivers should remain a key policy priority in regional transport planning. This includes the facilities and amenities that are available to them, and the condition they are in.
  - Treating the revision of regional speed limits as a primary solution to road trauma will prove limited in its effectiveness. Factors such as fatigue and behaviour must also be addressed. In the case of truck drivers, HVRAs are crucial for safety. The NSW Government should consider development of further HVRAs in NSW's regions, and work with the TWU to identify geographical gaps in the network, among other elements.
  - Variable road conditions remain a regional challenge that should be addressed. Regular assessment and maintenance of regional roads, particularly those frequented by heavy vehicles, may prove plausible through the establishment of a program or body for monitoring said roads. Truck drivers who travel these roads may provide valuable feedback and guidance based on real-world experience.
  - The NSW Government should consider engaging the TWU, as the representative of NSW's heavy vehicle drivers, in any future plans or initiatives regarding road safety across the board, and particularly in NSW's vulnerable regions.