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Response to the National Transport Commission's National in-vehicle Telematics Strategy

Toll Group, Linfox and Asciano are leaders in the road transport industry in Australia. The companies are at the forefront of road safety management practices, including around speed and fatigue.

There are too many heavy vehicle (HV) accidents on Australian roads. Year end Mar 09 there were 248 fatalities from accidents involving heavy vehicles, and ~30% of HV accidents are single vehicle.¹ HV drivers are not always at fault in accidents, but when a HV is involved, accidents tend to be more severe. Numerous studies have shown that major causes of HV accidents, particularly single vehicle ones, are fatigue and speed.²

Toll, Linfox and Asciano believe that the existing chain of responsibility (CoR) legislation provides a sound basis for improving road safety for both heavy vehicle drivers and those who share the roads with them. But increased company monitoring of fatigue management and speed is required to improve compliance.

Studies in Europe and the US show that introducing black boxes to monitor fatigue and speed reduce HV accidents by 20-30%, reduce the severity of the accidents and in Europe have reduced single vehicle HV accidents to ~15% (from ~50%). Cost/benefit analyses overseas have proved compelling with benefits up to 7 times costs.³

We believe it should be mandatory for companies to monitor fatigue and speed using telematics technology. We also believe it is vital to amend the current counting hour rules to make them nationally consistent.

For these reasons, Toll, Linfox and Asciano cannot support any of the three options currently being put forward by the NTC.

We are proposing that a new option (Option 4) that includes **mandating that companies use and monitor telematics technology** be developed. Option 4 should meet the following requirements.

PROPOSED OPTION 4

Regulators should look to determine the outcome not the process. There should be flexibility to allow the appropriate telematics technology to provide a broad range of both compliance and commercial benefits.

Regulators should focus on compliance and leave commercial aspects to industry.

1. The vital outcome is to improve safety and on-road behaviour by mandating an operator's management of speed and fatigue in their fleet. It is important to remember the operator and other supply chain participants already have legal responsibility for managing speed and fatigue under chain of responsibility (CoR) legislation

¹ March 2009, Department of Infrastructure, Transport, Regional Development and Local Government, Road Safety Statics

² Media release, Hon Anthony Albanese MP, Minister for Infrastructure, Transport, Regional Development and Local Government Road Safety and Productivity Package, 29 February 2009

³ January 2006, European Commission Directorate General Energy and Transport Report - "Cost Benefit Assessment and Prioritisation of Vehicle Safety Technologies", October 2009 European Commission Directorate General Energy and Transport final report - "Vehicle Event Recording based Intelligent Crash Assessment"

2. The Regulator should work to encourage the industry to embrace CoR legislation across the entire supply chain and not solely focus on the truck driver and their company
3. Self regulation – we believe that all heavy vehicles performing long distance work should have a monitoring device that assists owners and operators better manage speed and fatigue. Heavy vehicles are defined in NTC fatigue model law. Long distance work is defined in the Road Transport (Long Distance Operations) Award 2010.
4. The Regulator should not mandate a specific device
5. The National Heavy Vehicle Regulator (NHVR) should set a single national standard. State regulators should not deviate from this standard
6. The Regulator should mandate monitoring for speed & fatigue only. Anything further would delay a start up across the whole industry
7. The Regulator should amend legislation where required to allow use of electronic work diaries where operators choose to implement them as part of their telematics system
8. The Regulator will need to phase in mandatory compliance to allow all operators to fund equipment and establish thorough monitoring regimes within their businesses
9. The Regulator should take a proactive and preventative approach and not a punitive one – CoR legislation will lead to strong outcomes without the need for the regulator to be heavy handed
10. The compliance process should remain managed by the company although it should be available for external audit or accreditation such as under the National Logistics Safety Code or to the Regulator in the event of a major incident or investigation
11. Industry codes of practice are a vital part of ensuring safety in the industry and should be at the forefront of industry and regulator thinking on this issue

Minimum standards of compliance

It would be GPS enabled and would time / date / location stamp events e.g. over speeds, key on key off locations etc

It would send SMS or email messages in real time to the owner of the vehicle when a potential breach occurred

It would warn the driver that he is speeding

It would count driving hours and warn the driver when he was approaching a limit (SDH and BFM)

It would provide traceable records

It would have anti tampering systems e.g. It would monitor GPS speed v ECU speed and report variations

It would record distance and time between key on and key off

It would be able to identify the driver – log on key or smart licence

It would be able to Geo fence ad hoc locations

It would provide live location via web or other

It would be able to produce standard reports

It would be able to log accident data i.e. capture in detail activity prior to an “incident”.

Signed on behalf of Toll Group



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