

Driver Fatigue Management Policy

For the purposes of this Policy, 'Karoonda Freight Service', will be referred to as 'KFS' or 'the company' or 'our company'.

INTRODUCTION

KFS was purchased in November 2005 by the Emerald Group of Companies and operates entirely from the depot at 9-13 Aberle Street, Karoonda, South Australia. KFS offers a complete service including bulk grain and hay cartage, fertilizer supply and delivery, livestock transport, and a range of additional services.

KFS occasionally uses subcontractors that are generally fleet operators, but sometimes owner-drivers.

All subcontractors must abide by the company code of conduct and those accredited in the National Heavy Vehicle Accreditation Scheme for Mass & Maintenance (NHVAS) and has instigated Transitional Fatigue Management Systems will be given preference.

INTENT

It is the intent of KFS to meet the requirements of the Occupational Health & Safety Long Distance Truck Driver Fatigue Regulation.

It is the intent that KFS has systems in place to control the risks and hazards of fatigue and to ensure consultation and training takes place.

AIM

The aim of this policy document is to document the commitment of KFS to provide a safe, reliable and cost effective service to our customers and to demonstrate compliance under Road Transport Laws in each and every jurisdiction that the company operates.

KFS has a dual based role in this legislation and has responsibilities to owner drivers whom have been exempted from the legislation but are the responsibility of the Prime Contactor or the Head Carrier.

The second role is of administration and compliance and to be assured that all fleets and subcontractors that are not owner drivers meet the requirements of the Work Cover Legislation Long Distance Transport Law 2006. It is a requirement that

subcontractors submit a Driver Fatigue Management Plan (DFMP) to KFS for compliance under this legislation.

POSITION

The Occupational Health & Safety Amendment (Long Distance Truck Driver Fatigue) Regulation 2005 applies to KFS as:

- We own heavy trucks (GVM over 4.5 tonnes).
- We transport freight long distance (over 500km).
- We are a head carrier.

Although we do not

- Employ 200 employees so are not considered a consignor or consignee.
- Enter into contracts with its shareholders/owners/operators.

We recognise the necessity to comply with the Regulations.

OVERVIEW

1. The purpose of this Policy is to outline the steps which the Company takes to eliminate, reduce or manage the risk of driver fatigue.
2. The Company has a legal responsibility to manage driver fatigue when using heavy trucks to transport freight over long distances (over 500km).
3. This policy applies to both intra-state and inter-state journeys.
4. KFS will assess all foreseeable risks to operators where possible.
5. This policy also outlines the obligations and responsibilities of the subcontractor. **Failure to comply with these obligations and responsibilities could result in termination of your employment/contract with KFS.**
6. Subcontractors have an obligation under the Health & Safety Legislation to take reasonable steps to prevent risks to health and safety and a general duty to comply with all reasonable orders and directions of the company.

What is Fatigue?

Fatigue is the term used to describe the feeling of weariness from bodily or mental exertion. Fatigue can be defined as feeling tired, drained or exhausted. Fatigue influences an individual's physical and mental and emotional state. When feeling fatigued, we lose alertness, which is accompanied by poor judgement, slower reactions to events and decreased motor skills.

Fatigue can result from long periods of time awake, strenuous work as well as poor sleep patterns. The time of day that the work is performed can also have an influencing effect.

You are more at risk of being involved in, of causing an accident when driving whilst fatigued.

Sleep indicators include:

- A drowsy feeling

- Blurred vision
- Difficulty keeping eyes open
- Head nodding
- Excessive yawning

Fatigue indicators include:

- Feelings of sleepiness
- Extended sleep during days off
- A greater tendency to fall asleep while at work
- More frequent naps during leisure hours
- Not feeling refreshed after sleep
- Repeatedly drifting in and out of traffic lanes
- Increased errors and loss of concentration at work
- Missing gear changes and turn offs.

STEPS KFS TAKES TO MANAGE DRIVER FATIGUE

Responsibilities

The Operations Manager is responsible for implanting this Policy and the Managing Director is responsible for the overall quality, policy and provision to ensure an effective management system.

Trip Scheduling

Trip scheduling is a key factor in managing fatigue and scheduling is included in forward planning to minimize fatigue and to meet freight tasks. No long distance heavy truck driver (including subcontractors) is expected to drive an unreasonable distance in insufficient time with inadequate provision for rest.

OWNER DRIVER AND FLEET SUBCONTRACTOR AGREEMENT

As owner drivers that are used become the responsibility of our company, KFS will require the following information from owner drivers to be declared on request:

All multiple carriers will be expected to have prepared all schedules and driver rosters having due regard to the following factors:

- Previous trip times and report incidents.
- Time required to perform tasks safely.
- In a 7 day period, provide for at least 1 opportunity for 24 hours rest.
- In a 14 day period, provide for at least 1 opportunity for 48 hours of rest.
- In a 24 hour period, provide an opportunity for at least 6 consecutive hours of sleep.
- Providing flexibility to enable short and discretionary rest breaks.
- Time of day of travel and appropriate places and times to rest.
- Known weather conditions.
- As well as factoring in an opportunity for sleep, KFS recognises that drivers also need an opportunity to do such activities as washing and bathing, eating meals and travelling to and from the depot.

- Accounting for loading, unloading and queuing time. If a driver cannot rest uninterrupted during this period it should be counted as working time.

Contingency Planning/Procedure for Dealing with Accidents and Breakdowns

We know that on each journey there can be unexpected delays and disruption such as accidents or mechanical failure. These unexpected factors can contribute to driver fatigue and when they occur it is the company's responsibility to determine the best response to minimise the risk of fatigue.

If something unexpected happens on the journey the subcontractor and/or driver must let the company know as soon as reasonably practicable. The company will then make arrangements to get assistance to you if necessary or supply another truck or driver and will also manage the customer's expectations by letting them know what has occurred.

Rostering

Rostering is the way plans are made for the pattern of work and rest periods of the driver. Our company will always aim to roster in accordance with this Plan. Your roster is developed to maximise the opportunity to recover from the effects of fatigue.

We aim to apply the following principles/take the following factors into account when preparing rosters:

- A subcontractor and driver should be given at least 24 hours notice to prepare for a working period of 14 hours or more.
- A solo driver should have the opportunity for at least 6 hours of continuous sleep in a 24 hour period.
- The cumulative effects of fatigue over more than one day.
- During night operation hours of active work will be reduced to reflect the higher crash rate from fatigue from 1am to 6am.
- Minimise irregular or unfamiliar work rosters
- Operate flexible schedules to allow for short break time or discretionary sleep.
- Minimise very early departures to give drivers the maximum opportunity to sleep in preparation for the trip.

Night driving/Driving in Difficult Conditions

The company is aware that night driving is harder than day driving especially between the hours of 12 midnight and 5am. Ideally, we would like all vehicles to be safely off the road at this time. Unfortunately, because of our customer base, this is not always possible.

Driving in fog or rain or other difficult conditions is also more taxing on a driver and can contribute to driver fatigue.

KFS will take both night driving and weather conditions into account when planning schedules and rosters.

Delivery Times/ETA's

Many customers will put an arrival time, timeslot or ETA on your paperwork or verbally give you a time for delivery. You must at all times immediately notify management of ETA's or changes to an ETA which customers may request.

While KFS is mindful of customer service, it does not permit ETA's that place unreasonable pressure on our subcontractors or drivers.

The company only allows ETA's that fit the best practice of the company, comply with legal obligations and fit with your personal driver fatigue program.

Driving Hours and Days Worked

It is the responsibility of KFS to control and limit the hours a driver is able to do, therefore minimising any risk involved. Unless you have completed the Transitional Fatigue Management Scheme, you are limited to a maximum of 12 hours per day. This includes loading, unloading, fuelling, paperwork and any other associated tasks that are required to complete the job of driving.

You must not drive more than 5 hours continuously at any given time and you must have a continuous break of 6 hours minimum in every 24 hour period.

In New South Wales, Queensland, Victoria or South Australia you are limited to a maximum of 72 hours per week and you must have a continuous 24 hour break away from the vehicle every 7 days.

Monitoring Driver Fitness for Work

KFS reserves the right to demand all new subcontractors or drivers to provide a medical certificate showing they are fit for work.

When consulting with your Doctor, let him/her know:

- You are a truck driver
- You drive long distances
- You load/unload a heavy vehicle
- You may work night shifts

If you have a medical ailment that inhibits your ability to safely undertake a driving task or are reasonably suspected of being fatigued, you will be immediately suspended from driving until subsequent medical advice clears you as fit to work.

Work Environment and Amenities

Unsafe and unsuitable workplace conditions contribute to fatigue. Vehicle cabins should be designed with ergonomic standards for a driver to operate a vehicle safely. Vehicles must comply with Australian Design Rules and standards.

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Training/Education

KFS is committed to ensuring that all persons assigned responsibilities in relation to managing fatigue, including employees involved in preparation of schedules, driver rosters and risk assessments, and subcontractors and their employed drivers, are competent to perform their responsibilities.

Training should include:

- Common causes of fatigue
- Tips to identify signs of fatigue
- Hazards associated with extended hours of work
- Potential health and safety impacts of fatigue
- Company policies and procedures for fatigue management
- How drivers are responsible for making appropriate use of their rest days

Subcontractors and drivers should be assessed on their understanding of these points and records of any training should be kept.

Supervision

KFS will be working with all subcontractors and drivers to ensure they are appropriately supervised and follow the requirements on the DFMP.

Supervision may include:

- Monitoring arrival and departure times from depots and points of destination
- Scheduled telephone calls to drivers during journeys
- Auditing logbooks against the journey plan

Record Keeping

KFS is aware that by law all companies must maintain all records related to this Policy, including subsequent journey plans, risk assessments and hazards reporting; also any related documents required to prepare the Plan for a period of at least 5 years.

We will also keep a copy of all contracts entered into by us that relate to the transportation of freight long distance, using heavy trucks, journey plans, all trip schedules, delivery timetables and driver rosters prepared by or on behalf of the person or to which the person has access.

SUBCONTRACTORS AND DRIVER RESPONSIBILITIES

1. **All subcontractors and drivers need to be in a fit state for work** when presenting for duty. The need to be aware of the impact of activities such as a second job, other driving, recreational activities, sport, insufficient sleep, stressful situations and the consumption of alcohol and other drugs or medication. One or more of these facts can impact on your fitness for work.
2. **All subcontractors and drivers should avoid alcohol** for at least 24 hours before starting work and maximise your intake of fresh fruit and vegetables whilst working. Junk food and processed food should be avoided if possible.

3. Before each journey, all subcontractors and drivers will be required to **do a pre-trip vehicle visual inspection** and to declare whether they are medically fit for duty.
4. All subcontractors and drivers have a duty to **inform KFS and their employer at once if they become unfit for duty** due to medical ailment and must seek medical advice. Ignorance of the legal and safety issues related to medical ailments will not be accepted as a defence.
5. **You need to give us feedback.** If you notice any changes on a route (e.g. Road works, changes to speed limits etc.) that may affect trip scheduling, please let us know immediately. If loading/unloading or queuing times vary, let us know immediately. This helps us plan not only for your next trip but also for other drivers' trips.
6. **Take your breaks.** Subcontractors and drivers are entitled to the breaks outlined above. Please ensure that you take them. You should also take a break if you begin to feel fatigued while driving. We encourage you to stop, get out and walk around the truck as this can be helpful in combating fatigue. If you are showing symptoms of sleepiness, safely stop the truck in order to get some sleep (of course, you should ring the company to let them know so they can undertake re-scheduling and contact the customer if necessary).
7. **Aim to attend any training** that the company provides on fatigue management.
8. **Fill out your Logbook/driver trip evaluation plan** at the start and end of every journey. The duplicates pages from all owner drivers, subcontractors and their drivers' log books must be handed into your appropriate supervisor weekly. Copies should be made available to KFS on request and failure to meet this requirement could place in jeopardy future employment by KFS.

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