

28 May 2021



Dr Gillian Miles  
Chief Executive  
National Transport Commission  
Level 15/628 Bourke Street  
Melbourne VIC 3000  
Via NTC portal

## **GAS ENERGY AUSTRALIA RESPONSE: ASSESSING FITNESS TO DRIVE FOR COMMERCIAL AND PRIVATE VEHICLE DRIVERS**

Dear Dr Miles

Gas Energy Australia (GEA) appreciates the opportunity to respond to the National Transport Commission (NTC)/Austroads: Assessing Fitness to Drive for commercial and private vehicle drivers 2021 edition (draft for consultation purposes released 3 May 2021) (AFTD).

GEA notes the scope of the consultation on:

- the suitability of the changes in the updated draft guidelines;
- your experience with the current AFTD guidelines and any suggestions you have to make the next version more user-friendly; and
- any suggestions you have on education or support needed to increase use and knowledge of content in the guidelines.

GEA does not offer any suggestions on the suitability of the changes in the updated draft guidelines but has the following comments regarding usability and education and support.

GEA suggests that the NTC and Austroads recognise the AFTD has a broader target audience than just health professionals involved in assessing a person's fitness to drive or providing information to support fitness-to-drive decisions. In the gas fuels industry, this document is read, interpreted and forms a baseline of fitness to drive criteria for making determinations about medical fitness to be in charge of a company vehicle carrying dangerous goods. It is also read and interpreted by different licencing authorities as a motor vehicle licencing authority is different to a dangerous goods licencing authority.

GEA suggests the simple diagram displayed in Figure 2 of the AFTD: *The relationships and interactions between the driver licencing authority, health professional and vehicle driver* over simplifies the interactions for a person requiring a dangerous goods licence and could be expanded for greater clarity. With this in mind, GEA offers the following commentary on the expanded figure below and highlights additional stakeholders and responsibilities which could include:

- driver licencing authority and the dangerous goods driver licencing authority to make each other aware of and apply consistency in any determinations;
- for a medical practitioner (dangerous goods licence) to advise the driver of their responsibility if required to seek advice regarding the person's fitness to drive based on relevant clinical and functional information and on the relevant published medical standards of the driver licencing authority; and
- both driver licencing authorities to have a requirement to advise the driver of their responsibilities to notify their employer if driving (and a dangerous goods licence) forms part of their employment.



**GEA expanded figure highlighting additional stakeholders**

GEA notes with concern that a significant amount of content of the document is devoted to explaining the differences between State and Territory rules:

- regulatory requirements for driver testing (eight pages);
- legislation relating to reporting (seven pages);
- drivers' legal BAC limits (two pages); and
- alcohol interlock programs (four pages).

GEA urges consistency and recommends this start with the requirements for dangerous goods vehicle drivers being aligned across all States and Territories so they all would have a medical assessment on initial application, then every 5 years.

GEA considers that education and support is critical and urges the NTC and Austroads to make simple easy to use information available to all parties including the employers who rely on drivers every day to deliver dangerous goods across Australia.

In conclusion, GEA suggests expanding the stakeholders in the AFTD and including responsibilities that come from having two licences and being in charge of a dangerous goods vehicle, commencing a process of aligning medical requirements for dangerous goods licences and critically providing education and support to those at the front line who drive and who manage and dispatch drivers every day on our roads.

Yours sincerely

John Griffiths  
CEO  
Gas Energy Australia