



National Road Carriers Association (NRC) submission on

Work Health and Safety October 2024



About National Road Carriers Association

National Road Carriers Association (NRC) is New Zealand's progressive nationwide organisation representing 1500 supply chain company members, who collectively operate over 16,000 trucks throughout New Zealand. NRC advocates on behalf of members and works with central and local government on road transport infrastructure and regulations.

NRC members are committed to providing an efficient, productive, resilient, safe and value for money service that supports the wider economy. To achieve this, trucking operators need a safe, efficient, and sustainable operating environment that enables the efficient and safe movement of goods. Our members primarily operate road freight however a number also operate air, sea and rail freight services.

Some 54% of NRC's membership comprises single vehicle operators and 89% employ 10 or fewer.

General Comments

Firstly, we cannot ignore the reality that in 2023 businesses identifying as Transportation, Postal and Warehousing had a significant number of reported workplace fatalities and lost time injuries.

Fourteen workers lost their lives during the course of the year making our sector, along with agriculture and construction, the top three industries for deaths and serious injuries.

This cannot continue and it is our belief that changes are needed to lower the casualty rate associated with our sector.

Every worker should expect to go home uninjured every day.

Our sector is culturally diverse and we have an ageing workforce.

It is also a sector where many injury types result in time off work as there are limited light duty opportunities.

Is it the Act?

NRC does not believe it is the Act that requires change.

There is a need for the suite of Regulations under HASWA to be reviewed and updated or deleted as appropriate.

The current suite of Plant and Structures DRAFT Regulations be reactivated and completed within the next 12 months.

The Primary Duty of Care

Under Health Safety Work Act, a business or Person Conducting a Business or Undertaking (PCBU) must look after the health and safety of its workers and any other workers it influences or directs.

Almost every transport task involves overlapping duties.

Businesses must, so far as is reasonably practicable, consult, cooperate and coordinate activities with all other businesses they share overlapping duties with.

This on the face of it appears straightforward so why is it not resulting in a safe workplace?

The challenge in New Zealand is that in many cases Health & Safety policies are prepared in ***isolation and imposed*** with the objective of minimising perceived liability of one business rather than minimising or eliminating actual risk to the worker.

Combine this with limited guidance available on how to practically apply the consultation, cooperation and coordination

requirements together with a regulatory focus on prosecution rather than prevention is in our view the reason for the unacceptably high death and serious injury rate.

Our suggested changes in approach

Move to a simplified standard induction and or pre-qualification template for workers that operate on sites where overlapping duties exist.

Currently businesses are forced to complete dozens of these assessments / inductions annually, it drains resources—both in terms of time and money—that could otherwise be spent directly on improving Health and Safety practices.

Move to standardisation of site traffic management and load / unload guides.

Adopt a similar regulatory system to Sweden which requires continuous improvement of H&S systems and outcomes.

Encourage shared learning and communication between Health and Safety teams across the supply chain as there are too many bespoke processes and procedures.

Identify overseas guidance material and programmes that would be beneficial in NZ. Such as Healthy Heads Trucks and Sheds from Australia that addresses psychosocial hazards.

Better use of industry or sector bodies to disseminate new safety initiatives and information.

NRC would also like to see greater reward and recognition by the regulator to those businesses that are applying good practice.

NRC would like to see greater cooperation across regulatory agencies to identify at risk behaviours at the earliest opportunity and for those to form the basis for solution focused interventions that are aimed at preventing serious harm from occurring.

Worksafe NZ, ACC, NZTA and the Government all align and agree on national H&S Strategies, plus prepare and use Action Plans to deliver against the Strategic Plan. All plans must be focused on evidence and set attainable goals and outcomes.

As new material is developed it keeps in mind the new modern workplace with different systems of work and working times along with the diverse ethnicity of both the workers and the business owners.

Closing Comments

In summary, NRC believes the challenge is not in the legislation itself rather in the way it is being applied in the workplace and the lack of sufficient regulatory intervention at the low levels of injury.

We would prefer the regulatory focus was to move to preventing serious harm rather than prosecuting after the event.

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