Schedule 1:
Notice of Intention to register an Industry Code of Practice

SPONSOR DETAILS	
Name:	Sean Minto (on behalf of GTSN)
Position/Title:	GTSN Facilitator
Organisation:	Grain Transport Safety Network (GTSN)
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PRIMARY INFORMATION	
Proposed Title of Industry Code of Practice (ICP):	Grain Transport Industry Code of Practice
Need/Reason for the ICP: **(Describe the problem or risk that the code will help to resolve and explain why a code of practice is the best option, rather than training or guidance material for example.)**	The grain industry has a diverse fleet of truck types and permits which makes it difficult to confirm legal mass limits increasing the risk of overloaded heavy vehicles being driven on a road. Each year approximately 90 different truck types are loaded and unloaded during the grain harvest season and all year round. The grain supply chain flow can be complex involving a number of parties–see Appendix 1. The grain industry deal with a very large number of truck configurations, notices and permits that are difficult for growers, bulk handlers, end users, loading managers, loaders and unloaders, and truck companies to understand and maintain compliance to mass requirements. Implementing a Grain Transport ICP will provide guidance to parties in the grain supply chain on how to: 1. Identify heavy vehicle gross mass limits; 2. Manage axle group mass limits; and 3. Manage an overloaded truck. A Grain Transport ICP will make it easier for the grain industry to understand the permits and legal mass limits of the large number of configurations in the fleet. Improved accuracy of truck legal mass limits will improve safety along the grain supply chain. A Grain Transport ICP will allow Australia's agricultural supply chain to remain competitive by providing a legal instrument that allow trucks to load to the mass limit in a way that will protect road infrastructure and drive safety outcomes for the betterment of the industry and all road users.
Scope: **(Which industry or activity will the code focus upon? What are the hazards/risks the proposed code of practice will address?)**	The Code will focus on the road transport of bulk grain commodities from paddock to storage (silo or bunker) or to end user or to port, and from storage to end user or to port–refer Appendix 1. The proposed Code will address the hazards/risks of overloading heavy vehicles with grain commodities and managing the risks of non-compliant (overloaded) heavy vehicles arriving at premises. The factors that may contribute to the risk of a grain truck being overloaded include: (a) Grain is a heavy product that may cause a truck to be overloaded before its cubic capacity is met. (b) Different types of grain are denser (heavier) than others which may contribute to this risk. (c) During the grain harvest season, trucks are loaded on farm in paddocks where there is no, or limited, weighing facilities. (d) Grain loads are typically paid on a per tonne basis and parties will aim to maximise payloads to deliver productive and efficient business outcomes. An over-mass or unevenly distributed load can adversely affect the stability, steering and braking performance of a heavy vehicle. This can result in the

	driver losing control of the vehicle and cause serious incidents involving serious injuries and fatalities to drivers, other road users and pedestrians. A heavy vehicle that is overloaded can cause damage to road infrastructure and damage to the vehicle itself, including suspension damage and degradation of structural integrity. There are also significant fines and penalties for not complying with mass requirements.
Have you consulted on the need for the proposed ICP?	Yes
Who did you consult with? **(Indicate the names of organisations and the number of individuals.)**	Via GTSN meetings the following organisations have been consulted: Cargill/GrainFlow, Louis Dreyfus Company (LDC) (formerly Emerald Grain), GrainCorp, Manildra Group, Mauri ANZ, Quattro Ports (Qube), Viterra, Allied Pinnacle, JBS Australia, Ridley, ADM, LBRCA, NHVR, TfNSW, VIC DTP, QLD TMR. In addition, the GTSN has consulted with Grain Trade Australia (GTA). Approximately 30+ individuals have been consulted.
Is the proposed ICP supported by those you consulted with? **(Summarise the reasons for their support.)**	Yes. The reasons for the support of those consulted is that implementing a Grain Transport RICP will allow Australia's agricultural supply chain to remain competitive by providing a legal instrument that allow trucks to load to the mass limit in a way that will protect road infrastructure and drive safety outcomes for the betterment of the industry and all road users. We note GTA's position on the proposed ICP is not entirely clear to the GTSN.
Can you or your organisation recommend people with relevant experience and expertise who could contribute to the development of the ICP? **(Indicate the number and kinds of contacts but there is no need to name them at this point.)**	Farmers and grower associations and their members in respective states, transport industry associations and their members, other supply chain participants in the bulk grain supply chain including bulk handlers, feed mills and feedlots, flour millers, petfood processors etc. State road authorities and LGA road managers.
Can you or your organisation support NHVR to facilitate industry workshops and meetings as part of code development? **(Indicate your/ the organisation's experience with similar projects, and the human and other resources that could be contributed.)**	Yes. The GTSN is comprised of member companies who work together for the common interest of the grain industry in promoting a safe working culture. The GTSN meets three times per year at member company's offices and could help facilitate industry workshops and meetings as part of the code development. The GTSN members have collaboratively developed and implemented the GTSN Truck Book, a preeminent resource in managing the mass requirements applying to bulk grain trucks. Through the development of the Truck Book the GTSN believes it has already done the majority of the "heavy lifting" in the proposed code development.
Are you aware of any standards or codes covering similar subject matter as the proposed Code of Practice? **(List the relevant standards or codes.)**	Master Industry Code of Practice (Master Code) (at a high level–not industry specific) Tasmanian Agricultural and Horticultural RICP (in part–does not address all hazards and risks in detail)

IMPLEMENTATION	
Do you expect that control measures identified by the ICP would require major cost or re-organisation to implement? **(State whether there are anticipated control measures that would be expensive or onerous to implement and discuss how that will impact the relevant industry.** **Noting that recommended controls in an ICP are not mandatory, is it anticipated that the ICP will identify alternative controls that could also be used to manage the same risk?)**	It is not anticipated that there would be any control measures that would be too expensive or onerous to implement. The Code will adopt the hierarchy of control to identify alternative controls that could also be used to manage the same risk.

How soon will industry, including smaller businesses, be likely to be able to implement control measures identified by the ICP? **(Provide some background information about the industry at present e.g. its access to information, composition and distribution, typical operating model, resources, membership of organisations, appetite for change etc.)**	Australian grains production occurs across three regions—comprising 13 different agroecological zones with differing climate and farming systems. The Grain Growing industry's operating conditions have been volatile over the past five years. Varied weather conditions have caused production and prices to fluctuate significantly. The grain industry includes farmers and growers, transport operators, bulk handlers, feed mills and feedlots, flour millers, petfood processors etc. who may be represented by a number of varying industry associations. It is anticipated the industry would be likely to be able to implement control measures identified by the ICP within a 12 to 24 month period.

IMPACTS **(Describe any foreseeable impacts/constraints/problems which may impact development or implementation of the Code.)**	Clarity on sponsorship of the Code. We note the GTSN encourages sponsorship by the GTA and would support the GTA with the development and implementation of the Code. Note all GTSN members are also GTA members. The sheer number of stakeholders involved in the grain transport supply chain, from individual farmers (growers) to grower industry associations at a state level, state road authorities and LGA road managers etc.

REFERENCE/SOURCE MATERIAL **(Provide any reference or source materials you know of that support the proposal to develop the Code, or that could be used to develop it.)**	Grain Transport Safety Network Truck Book Grain Trade Australia Grain Industry Transport Code of Practice (not an RICP under the HVNL) Tasmanian Agricultural and Horticultural RICP NHVR Regulatory Advice – Managing the risks associated with non-compliant heavy vehicles arriving at premises

For more information:

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Appendices

Appendix 1. Grain Supply Chain Flow