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National Heavy Vehicle Regulator
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Submitted via email – info@nhvr.gov.au

NHVR – Grain Harvest Management Scheme Reviews

The purpose of this letter is to provide feedback from Co-operative Bulk Handling Limited (**CBH**) in response to the Issues Paper released on 22 August 2019 (**Issues Paper**) by the National Heavy Vehicle Regulator (**NHVR**) in relation to its review of Grain Harvest Management Schemes operating across Australia (**Review**).

Background - CBH

Established in 1933, CBH operates a large and complex supply chain in regional WA (comprising road, rail and port infrastructure), which currently receives and exports around 90 per cent of the 14.6 million tonne average annual WA grain harvest.

Owned and controlled by more than 4,000 Western Australian grain growers, CBH is Australia's largest exporter of grain, with a market share of approximately 30 per cent of aggregated bulk Australian grain exports.

In a typical year Deloitte Access Economics calculated that CBH and its grower members contribute almost \$3.5 billion in gross value-add to the WA economy.

Responding to the Issues Paper

As noted in the Issues Paper, WA does not operate under the Heavy Vehicle National Law (**NHVL**). Instead, WA's heavy vehicle regulations continue to be developed at a local level (primarily by MainRoads WA (**MRWA**)). Relevantly, WA has operated a stand-alone State-based Harvest Mass Management Scheme (**WA HMMS**) that is administered by MRWA and which has been developed in a collaborative and practical fashion by growers, industry and State Government over many years.

The WA HMMS is not a concessional loading scheme. A Transport Operator is expected to aim for statutory mass limits when loading their vehicles. However, given there are no weighing facilities on paddocks and the known variations in grain densities, the HMMS allows for a margin of error during the loading process. With the assistance of the grain receiver (such as CBH), the overloaded tonnes are forfeited by the grower and future loads can be adjusted for the next delivery which eliminates serious overloads and works toward achieving fully compliant loading practices for the remainder of the harvest season. The scheme commences each year

between the first day of October and finishes on the last day of February. To join HMMS, operators are required to register with the relevant grain receiver.

The Issues Paper notes that the WA HMMS is not subject to the Review.

Nevertheless, given the clear benefits to WA grain growers and the industry of the WA HMMS, CBH and its grower members would have significant concerns if there were plans to remove or modify the WA HMMS and move towards a national system. Any perceived benefits of a national system should be balanced not only against the resulting increased regulatory compliance cost, but also the significant safety and productivity efficiencies that have been gained at the local level which may not be available under the national system.

We are grateful for the opportunity to comment on the Review and would ask you to contact our Government & Industry Relations Manager, Mr David Paton, direct should there be anything further you require.

Yours sincerely



Ben Macnamara
General Manager Operations