

# Grain Harvest Management Scheme Review

## GTSN Submission

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## 2 Executive Summary

Grain Transport Safety Network (GTSN) members thank the NHVR for taking the initiative to review the different grain harvest management schemes to move towards a simpler, national scheme.

The GTSN strongly advocate the harmonisation of existing state-based Harvest Mass Management Scheme (HMMS) notices to create **one national HMMS – (option 2)** that is simple for the entire industry to participate.

Through the GTSN's work with the regulators in Qld, NSW, Vic and SA implementing the different grain harvest management schemes, the GTSN recommends leveraging from the experiences of these schemes to implement anew improved scheme to benefit all aspects of the industry.

Examples of scheme elements that work well include:

- Qld where the scheme applies to all trucks with a flat % and the strong collaboration between TMR, AgForce and the industry
- NSW does not require truck registration to participate in the NSW HMMS
- Victoria gave feedback to registered trucks with overloading trends for the 18/19 harvest and will increase the feedback frequency for the 19/20 harvest
- SA applies to trucks that NHVAS Mass

Implementing a national HMMS will allow Australia's agricultural supply chain to remain competitive by providing legal instruments 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

In the GTSN, we propose the *GTSN Truck Unloading Operating Guidelines* that GTSN members currently comply with. These guidelines are included in this document in *Section: 4 GTSN Truck Unloading Operating Guidelines* of this document.

Below are the key themes of the GTSN recommendations, in order of priority:

1. Participation by all – conservatively, GTSN members represent 50% of the sites that receive grain in Queensland, New South Wales, Victoria and South Australia. Regulatory compliance should seek to drive industry productivity and efficiency in a safe manner and should not be a commercial disadvantage for parties adhering to such a scheme.
2. Simple HMMS mass limits
  - Recommend Mass Limit + 5% because it is common across all schemes - Mass Limit means the General Mass Limit, Concessional Mass Limit, Higher Mass Limit, Performance Based Standards Mass Limit and the means National Class 3 Heavy Vehicle 19m Truck & Dog Trailer Combination Mass Exception (Notice) 2014 (No 1), or the National Class 2 Heavy Vehicle B-Double Authorisation (Notice) 2014 (No.2)
  - Include guidance on how CML, HML & PBS should be managed because all configurations are unable to load accurately in a paddock
3. Never 'reject' a heavy vehicle - heavy trucks should always be unloaded and then managed – Considerable risk to all road users may result if an overweight vehicle is returned to the road due to rejection.

4. Centralised regulation – by a Scheme Administrator, preferably the NHVR
5. Centralised data reporting a Scheme Administrator – all data should be received by a single Scheme Administrator
6. No requirement by receival facilities for axle weighing
7. Scheme Administrator provides feedback via NHVR/State Heavy Vehicle Regulators about overloads to owners of registered trucks and to receiving facility - PGRs should not be required to communicate with other parties when overloads occur instead of expecting them to be the ‘policemen’
8. Compliance with the *GTSN Truck Unloading Operating Guidelines* provide a reasonably practicable defence under the heavy vehicle national law
9. Registration Requirements:
  - Remove requirement for growers and trucking operators to register to participate
  - All receiving facilities must register with the Scheme Administrator and provide data – those that do not participate should only apply non-harvest mass limits
10. The harvest mass limit should apply for the harvesting season
11. Remove nearest practical PGR
12. Remove special conditions imposed by councils
13. Allow access to all the road networks on approved routes
14. Cover all Crops, including cereals, pulses, legumes, oilseeds and rice
15. Exclude shipping container movements on the back of trucks because they can accurately weigh
16. Do not require annual weighbridge certifications – NMI does not require this, and it adds extra unnecessary cost to PGRs that have adequate systems in place to ensure weighbridge accuracy

*Appendix A: Summary of Proposed National HMMS recommended by GTSN* includes these themes into the table used format from the Issues Paper.

In this response, the GTSN deliberately does not provide harvest data showing differences between the gross weight and mass limit. Currently, GTSN members report all harvest deliveries to the state regulators and this information contains very important reference data explaining why the scheme exists. For example, the standard deviation between the gross weight and the mass limit is very similar for trucks operating under GML, CML, HML and PBS. These trends are important for identifying what harvest mass limits should be and the GTSN recommend that the NHVR use this data to determine the mass limits.

*Appendix B: Chart Showing Distribution of Gross Weight vs Mass Limit* includes a histogram of the gross weight as a % of the mass limit as an example from a GTSN member during harvest. This example shows the receival trend of gross weight received compared to declared legal mass. 98% of all receivals during the harvest period are received at <=5% over the legally declared mass of the heavy vehicle. This receival trend is similar for all GTSN members.

### 3 Introduction

The applicant of this submission is the Grain Transport Safety Network (GTSN). The GTSN is represented by the major bulk grain handlers and end users. Member companies are listed below. The GTSN pro-actively engages with other key stakeholder groups, including Grain Trade Australia (GTA) and Livestock, Bulk and Rural Carriers Association (LBRCA) NSW. Other industry stakeholders participate.

The vision of the GTSN is zero harm across the supply chain. The primary objective of the GTSN is to raise awareness, collaborate and improve safety for grain moved by trucks. Further information about the GTSN is available on the GTSN website at [www.gtsn.com.au](http://www.gtsn.com.au).



## 4 GTSN Truck Unloading Operating Guidelines

GTSN members unloading trucks adhere to the following operating guidelines

- Utilise the truck codes in the GTSN Truck Chart and GTSN Truck Book for the identification of mass related information to determine the mass limit
- Advise trucks when they exceed the mass limit during the unloading process
- Communicate with growers when overloads occur, examples include emails to NGR email address, or other forms of customer communications
- Report data to Scheme Administrator for all completed transactions once Memorandum of Understanding (MOU) is signed with the Scheme Administrator – this includes the registration plate, gross weight, tare weight and claimed truck configuration and permits if loading above GML
- Management reporting of grower delivery profile to identify adverse or other trends for follow up with other supply chain parties as required

*Note that these guidelines are not currently published on the GTSN website. GTSN members plan to incorporate any feedback about these guidelines during the HMMS consultation process, to then publish on the GTSN website.*

## 5 Opportunities to Improve Truck Identification and Registration

### 5.1 Data Accuracy

Accurate capture of registration plate details is important for the Scheme Administrator to give feedback to registered trucks that exceed the mass limit.

Based on information provided by VicRoads, over 24% of deliveries were incorrectly categorised, either with vehicle registrations or mass limit codes, and this will make scaling the Victorian process to give feedback to the registered owner difficult.

GTSN members are taking steps to improve accuracy through improved staff training.

GTSN recommend that the best way to improve registration accuracy is through technology Options for consideration include:

- Radio-Frequency Identification (RFID) tags for all trailers and prime movers with the following information:
  - License plate number
  - State of Registration
  - GVM and GCM
  - NHVAS Mass Number
  - NHVR PBS Vehicle Approval Number and maximum mass limit
  - IAP permit number and applicable states
  - Primary Producer Plate status



- Optical Character Recognition (OCR) for number plate identification – this is more expensive and potentially uncommercial with accuracy issues
- Block Chain to allow data permit details downloads from the NHVR from identified registration plates either by RFID, OCR, other digital technology, or manual data entry

## 5.2 Mass Data Downloads

GTSN Member systems could provide significantly better data accuracy on truck registration and permits if the Scheme Administrator could provide bulk data feeds into these systems. This accuracy could be achieved by validating registration and auto-populating applicable permits.

Currently, the NHVR provides this data on approval from trucking operators individually following their consent. This is not practical for ex-farm deliveries due to the large number of trucks.

## 6 GTSN Truck Chart and Truck Book

Grain harvest has a transient workforce, and training staff about complex systems and permits is difficult. Contributing to this, mass limits with grain are likely the most complex out of any industry in Australia due to the significant variation in truck combinations.

In 2018, GTSN members implemented a Truck Chart with 15 combinations that represent 95% of the configurations that deliver grain ex-farm. Outside of harvest, the chart represents over 99% of the configurations. An example of the chart is included in *Appendix C: GTSN Truck Chart*.

A key feature of this chart is all GTSN members use the same truck code number, which makes identification of vehicle configurations easier for staff and truck drivers. An added benefit of this is consistent data reporting to regulators about configurations and mass limits.

The GTSN Truck Chart includes the different harvest mass limits that currently apply in Qld, NSW, Vic and SA. It provides a striking illustration of the differences between the state harvest mass limits.

Currently, the GTSN is developing a truck book that includes all 93 truck configurations, with sections on procedural guidelines and technical information. In the book, each truck code has an individual page with information and permits specific to that vehicle. Currently, the draft version has 150 pages, further illustrating the extremely large number of truck configurations. Example pages are included in *Appendix D: Example Pages of GTSN Truck Book*.

To manage these mass limits, PGR systems to identify these mass limits involve very large databases with up to 11,000 different mass limits.

## 7 Overview of State HMMS

State	Positive	GTSN Recommendation
Qld	<ul style="list-style-type: none"> <li>• Excellent collaboration between TMR, AgForce and Industry</li> <li>• Very high participation</li> <li>• Next day reporting and immediate feedback to overloaded trucks/negative trends</li> <li>• This is the simplest scheme in the way the mass limits are calculated (GML + 7.5%) for all configuration</li> <li>• Guidance on how to manage GML, CML HML and PBS trucks where warnings are allowed</li> <li>• TMR enforcement are active during harvest educating industry on the scheme</li> </ul>	<ul style="list-style-type: none"> <li>• Remove rejection limit and allow all trucks to unload with Scheme Administrator reporting</li> <li>• Remove sticker requirement</li> <li>• Remove nearest practical PGR clause</li> <li>• Extend MOU time from annually to the duration of the notice</li> <li>• Remove requirement to provide copies of weighbridge certifications annually because some PGRs have alternative process that comply with NMI requirements that require less frequent certifications</li> </ul>
NSW	<ul style="list-style-type: none"> <li>• Registration is not required to participate – trucks simply need to present a copy of the harvest gazette notice to operate at the harvest mass limits</li> <li>• Harvest Reports done by external consultants are informative about trends when they are completed</li> <li>• MOU lasts for the duration of the scheme instead of having to sign annually</li> <li>• No requirement to provide weighbridge certifications annually</li> </ul>	<ul style="list-style-type: none"> <li>• Simplify very complex mass limits <ul style="list-style-type: none"> <li>○ Some trucks get GML + 5% and others get CML without NHVAS</li> <li>○ No super single tires</li> </ul> </li> <li>• Include excluded trucks – currently only accounting for approximately 20% of all harvest deliveries</li> <li>• Scheme Administrator provide guidance on how to manage overloads</li> <li>• Mandatory council participation – less of an issue since go live because councils always sign up in grain growing areas</li> <li>• Improve very low industry participation, particularly with domestic end users such as flour mills, feedlots and feed processors</li> <li>• Improve harvest review process between NSW PGRs and regulator, which deteriorated following the 2017 RMS restructures</li> <li>• Remove scheme nearest practical PGR clause</li> <li>• Include all Ports</li> </ul>



State	Positive	GTSN Recommendation
Vic	<ul style="list-style-type: none"> <li>• Data analytical capability to pinpoint trucks with adverse trends</li> <li>• Feedback to owners of registered trucks</li> <li>• Regular meetings (i.e. every 2 months) between VicRoads and GTSN</li> <li>• Active regulator engagement to resolve last mile issues</li> <li>• No requirement for nearest PGR</li> <li>• Port deliveries are permitted</li> <li>• Simple to understand for qualifying combinations</li> <li>• No requirement to provide weighbridge certifications annually</li> </ul>	<ul style="list-style-type: none"> <li>• Remove registration requirement for stickers to opt into the scheme</li> <li>• Remove environmental incentive for trucks being newer than 2002 and ADR80 compliant</li> <li>• Incorporate grower groups and PGRs in review meetings</li> <li>• Improve very low industry participation, particularly with domestic end users such as flour mills, feedlots and feed processors</li> <li>• Include all combinations</li> <li>• More frequent reporting and feedback to registered owners</li> <li>• Extend MOU time from annually to the duration of the notice</li> </ul>
SA	<ul style="list-style-type: none"> <li>• Simple scheme with CML + 5% for trucks with NHVAS requirement</li> <li>• Relatively simple notice when compared to other state notices.</li> <li>• Applies to CML (other states only apply HMMS to GML)</li> <li>• NHVR SA enforcement are active during harvest educating industry on the scheme</li> <li>• No requirement to provide weighbridge certifications annually</li> </ul>	<ul style="list-style-type: none"> <li>• Remove requirement to have downward trending mass limits from a paddock, which is difficult to Scheme Administrator and open for misuse</li> <li>• Remove the requirement for NHVAS mass accreditation</li> <li>• Include all combinations</li> </ul>

## 8 Responses to Questions

The following sections include the GTSN responses to the questions from the *Grain Harvest Management Schemes Review Issues Paper* with the following structure:

- *Section: 9 Existing State-Based HMMS Schemes*
- *Section: 10 Designing a National HMMS*

## 9 Existing State-Based HMMS Schemes

### 9.1 Barriers

#### 9.1.1 Are there barriers to the adoption of the current scheme?

Qld

- Pre-registration with AgForce to get sticker
- Nearest receival site is included
- Rejection limits apply resulting in overloaded trucks driving on roads once identified

NSW

- Scheme mass limits are extremely complex, so it is difficult to train staff and configure systems
- 13 out of the 93 configurations that GTSN members deal with are included
- Nearest receival site is included
- Council participation is optional, and conditions are complex and difficult to comply with

Vic

- Scheme mass limits are complex and difficult to train staff and configure systems
- Stickers issued to approved trucks only and this is an unnecessary administration function
- The requirement that trucks are newer than 2002 and AD80 compliant excludes many trucks
- 12 out of the 93 configurations that GTSN members deal with are included

SA

- Scheme is complex and difficult to train staff and configure systems
- Council participation is optional
- NHVAS Mass is required, which is expensive for non-commercial grower trucks
- Many truck configurations are excluded

#### 9.1.2 If you are an operator – are the current schemes easy to understand and apply?

Not applicable because GTSN members do not operate grain trucks.

### 9.1.3 Do drivers know about the current schemes and their obligations under them?

No. In all states, GTSN member policies and procedures are the main training tool for growers and truck drivers about how the schemes work.

Qld

- Extra information is provided through the sticker registration process

NSW

- No further comments

Vic

- Limited sticker use means truck drivers do not know about conditions of scheme

SA

- No further comments

### 9.1.4 What has been your experience operating across borders? Are there any barriers to cross border grain transportation?

NSW/Vic, NSW/Qld and Vic/SA cross border movements are common depending on market conditions and the size of the grain harvest.

Examples that drive these cross-border movements include Northern NSW where the Port of Brisbane often has the strongest price for ex-farm grain, so growers will deliver to PGRs in Southern Qld where there is rail capacity to export markets.

Additionally, domestic demand for grains is increasing year on year as a result of population growth and a need for food security, which further increases cross border movements when there are low harvest volumes in specific areas.

In addition to grain moving physically across borders, other considerations supporting the argument for a national HMMS include:

- Staff working with PGRs often move across borders, so it means they need to be trained in all the different schemes. At the time of writing, it is dry in NSW and there is grain in Victoria and Central Queensland, and NSW staff must be re-trained in the other systems.
- Truck companies specialising in bulk grain transport frequently operate in all states and they often run into problems when first delivering in a new state because they do not understand the scheme. For example, NSW trucks do not need to register and when they arrive in Qld to deliver, they know the mass limit and do not know they need the sticker, otherwise the non-harvest mass limit applies, and it becomes complex if they are overloaded.

### 9.1.5 What are your thoughts on the eligibility criteria for operators to join current HMMS?

Qld

- The function of the stickers is to communicate with trucks the rules of the scheme and to remove rouge operators – administratively, this process is expensive, and training could be

achieved in a more effective way. Truck removal from scheme is rare, so limited consequence.

#### NSW

- NSW is the only state where there are no eligibility criteria and GTSN recommend using this process as a template for a national HMMS

#### Vic

- Whilst the GTSN fully supports newer and more environmentally friendly trucks, the requirement that trucks are newer than 2002 and compliant with ADR80 excludes many trucks from getting the GHMS stickers

#### SA

- Many grower trucks only operate for a small proportion of the year, so the requirement for NHVAS mass is unnecessarily expensive

## 9.2 Compliance

### 9.2.1 Does the current scheme support operators and the grain industry to be more compliant under HVNL and/or scheme requirements?

All schemes provide higher harvest mass limits for some or all configurations unloaded, and this does help trucks load to the mass limit and use the higher harvest mass limit as a buffer.

#### Qld

- Strong collaboration between TMR, AgForce and the PGRs leads to effective communication and better compliance outcomes
- High participation by truck operators and PGRs meant that a large proportion of the ex-farm delivery task is covered
- Rejection limits create difficult situations for PGRs, growers and truck operators to manage when extreme overloads occur

#### NSW

- Excluded combinations are difficult to manage
- PGR participation is very low

#### Vic

- Excluded combinations are difficult to manage
- Less than 200 GHMS stickers are issued and the loads with the stickers represent a miniscule proportion of the total ex-farm deliveries
- PGR participation is very low

#### SA

- Excluded combinations are difficult to manage
- Paddock tracking requirement leads to misrepresentation of loading paddocks

9.2.2 Does the current scheme provide operators enough opportunity to rectify their loading practices? Why/why not? Through what methods?

Qld

- Trucks get fast and strong feedback from TMR and AgForce when they overload
- Main penalty is being removed from the scheme and this is rare so little consequence

NSW

- Historically, tend to use the stick more often than the carrot with compliance activity – harvest is a massive task and coverage is very limited
- More use of analytics and data feedback to trucking operators as per the Vic model would leverage existing data and complement communications from PGRs

Vic

- Communication from VicRoads to registered operators is helpful because it complements the communications from PGRs
- More frequent communication throughout the harvest period from VicRoads/Scheme Administrator would be helpful

SA

- Requirement to be in NHVAS mass adds limited value and downward trending paddock weights is unnecessarily complex

9.2.3 How often do PGRs check to ensure there has been no continued and/or repeated gross overloading? What methods do they use to verify this?

All GTSN members individually comply with the *GTSN Truck Operating Guidelines* included in this response included in *Section: 4 GTSN Truck Unloading Operating Guidelines* of this document. This means the mass limit is identified and validated against the gross weight, there is communication to the driver when there is an overload, followed up with supplementary communication using other channels, including emails to the NGR email address.

Guidance from a Scheme Administrator about what repeat overloading means is unclear for GTSN members and this should be clarified under a new scheme so that there is consistency in the way PGRs give feedback to growers and truck companies when overloads occur.

9.2.4 What are the consequences for an operator who fails to meet scheme standards (such as through repeated overloading)?

An absence of guidance about overloads means there are different policies with GTSN members.

Examples include:

- GrainFlow (Cargill) print warning notices, communicate with growers and ban truck registrations at individual sites for repeat overloading
- Emerald, GrainCorp and Viterra print warning notices for overloads and communicate with growers using the National Grower Registration database
- Ridley print warning notices and restrict site access to the vehicle owner and all their trucks

that have adverse trends with overloading

Restricting trucks and operators from site has issues because trucks still deliver to other locations. It can also be ineffective because most trucks complete 10 or less deliveries. Issues with accurately recording registrations is problematic.

Analysis and feedback to growers occurs at different levels across GTSN members. This is inconsistent due to a lack of guidance from a Scheme Administrator about how this should occur.

### 9.2.5 Are there circumstances in which a registrant can be excluded from the scheme?

Qld

- AgForce pre-qualification questionnaire educates and excludes operators who are unable to answer the questions
- Stickers can be removed for repeated or extreme overloading, and this is very uncommon

NSW

- No – RMS can/have used data to target specific operators via on road compliance activity

Vic

- Trucks could potentially have their GHMS stickers removed, although this doesn't appear to have occurred because the stickers are very uncommon

SA

- Trucks could potentially lose their NHVAS mass accreditation, although this is very unlikely and GTSN members are unaware of this occurring for any operators

### 9.2.6 For PGRs specifically – do you have any other applicable assurance processes?

In all states, GTSN members make significant investment to mitigate risks that exist under the heavy vehicle national law. This includes understanding mass limits, training staff on how to identify them, and changing systems to record the information and communicate with truck drivers and other road parties. Development of systems and staff training is a continuous process.

A major reason for the establishment of the GTSN is to improve the industries compliance in these areas.

## 9.3 Benefits

### 9.3.1 Do you find the current HMMS effective and worthwhile? Why or why not?

There are positive elements and improvement opportunities with all schemes. These are outlined in *Section: 7 Overview of State HMMS* table of this document.

### 9.3.2 What mass limit do you currently operate under? Should this limit be reduced or expanded?

GTSN members apply mass limits in all states that they operate. This includes GML, CML, HML, PBS and GHMS.



## 9.4 Other Issues

No response.

# 10 Designing a National HMMS

## 10.1 Purpose

10.1.1 Is the stated purpose enough to ensure the efficient running implementation and effective operation of a national HMMS?

Yes

10.1.2 Should any other objectives be listed?

Refer *Section: 2 Executive Summary* of this document.

## 10.2 Structure

10.2.1 Please indicate your preference for options 1, 2 or 3; and provide reasons

The GTSNs preference is **option 2** – Harmonise existing state-based HMMS notices to create one National HMMS notice. This would replace separate state based HMMS.

10.2.2 Do you have a suggested proposal for an alternative framework which is not listed above?

No

## 10.3 Administration

10.3.1 Is the role of Scheme Administrator role best undertaken by a regulatory body or co-operatives? Please provide reasons for your response.

The GTSN recommend that all state-based registration processes are removed, and data reporting is centrally done to a Scheme Administrator. Feedback to registered owners of trucks that overload using the Victorian process on a national level is required.

10.3.2 What powers should the Scheme Administrator have?

The NHVR should Administer the scheme with channels to the state compliance areas to monitor compliance trends and act against operators with heavy loads as required.

10.3.3 What roles should the Scheme Administrator perform?

- Manage the MOU signing process – recommend duration is the length of the notice

(i.e. 5 years) instead of annually

- Maintain a website with the GHMS rules, operating conditions and industry reports on trends in the scheme
- Provide a channel (email address or phone number) for growers, truck operators and PGRs to ask questions about the scheme
- Facilitate regular (every 2 months) review meetings with PGRs and industry
- Receive data from PGRs and regularly analyse it to give feedback to registered owners of trucks with adverse trends
- Implement a digital solution to assist identifying truck codes and the permits they operator under – GTSN recommendations are included in *Section 5: Opportunities to Improve Truck Identification and Registration* includes GTSN recommendations in this area
- Give feedback on the GTSN truck chart and book with mass limits
- Review, evaluate and monitor the effectiveness of compliance by PGRs and give feedback where required

#### 10.3.4 Should PGRs establish operating procedures and a condition guide specific to their site?

GTSN members comply with *Section: 4 GTSN Truck Unloading Operating Guidelines* of this document.

### 10.4 Registration

#### 10.4.1 Please indicate your preference for either option 1, 2 or 3. Please provide reasons for your response.

The GTSN recommend the NSW model where neither the Producers, or Any grain transport operators must register, therefore the GTSN does not agree with options 1, 2 or 3.

Instead, the NSW model where the PGRs must register and provide data is the best outcome. Registration for growers or truck companies is unnecessary because it adds cost and has limited effectiveness.

#### 10.4.2 Do you have a suggested proposal for who may be a participant who is not listed above?

No. This is answered in the previous response.

#### 10.4.3 What should the registration process look like?

PGRs should sign a MOU with the Scheme Administrator to participate where they agree to provide data and agree to the *Section: 4 GTSN Truck Unloading Operating Guidelines* of this document.

#### 10.4.4 How and for what reasons can a registrant be excluded from the scheme?

PGRs should be excluded from the scheme if the Scheme Administrator determines policies and procedures lead to negative compliance outcomes. PGRs that do not sign an MOU and agree supply data to the Scheme Administrator should be unable to apply higher harvest mass limits.

The GTSN recommend parties that do not participate in the HMMS should be the focus of enforcement and compliance operations.

#### 10.4.5 What, if any, mandatory obligations should be included as part of the HMMS national scheme?

Agree to the GTSN Truck Unloading Operating Guidelines and provide data in a defined template using about all deliveries to the central Scheme Administrator. The current templates used in all states are suitable by requesting relevant data.

### 10.5 Commodities

#### 10.5.1 How should 'commodity' be defined in a new HMMS?

Refer **Crops** are cereals, pulses, legumes, oilseeds and rice from *Section: 15 Appendix E: Definitions*.

#### 10.5.2 Which agricultural commodities should the scheme include and/or exclude? Please provide reasons for your response.

Include grain commodities defined in *Appendix E: Definitions* and exclude commodities not included in the definition.

### 10.6 Vehicle Types

#### 10.6.1 Should any configurations be included or excluded from this list?

No. Trucks that are excluded from the NSW, Vic and SA schemes makes staff training difficult and these excluded combinations have the same issues loading to a mass limit as qualifying combinations. Allowing a higher harvest mass limit for these excluded combinations would have limited impact on road infrastructure due to these combinations infrequent use.

The Qld process of applying a flat % to the mass limit is easy for everyone to understand and this methodology is the GTSN recommendation for how the HMMS Mass Limit should be calculated.

#### 10.6.2 Should Performance Based Standards (PBS) vehicles be considered?

Yes. The standard deviation between the gross weight and mass limit is the same for PBS trucks as it is for all other combinations. This trend is visible in the GHMS data GTSN members provide regulators in all states.

## 10.7 Mass Allowances

10.7.1 Should there be a nationally set mass limit tolerance? What should this tolerance be (5%, 7.5% or 10%)? Please provide reasons for your response.

A single mass limit + 5% should apply national based on existing mass limits on all vehicle types. This should include trucks operating GML, CML, HML, PBS and Class 2 and 3 Notices.

To determine what the mass limit should be, the GTSN recommend that the NHVR analyse existing GTSN data provided in Qld, NSW, Vic and SA to make informed decisions about:

- a) How frequently GHMS, GML, CML, HML and PBS is used
- b) The standard deviations between the gross weights and mass limits
- c) What the mass limit should be to allow trucks to load to it on average to minimise underloading and minimise legal exposure when the average is exceeded

Analysing the data will determine for the NHVR what the mass limit should be.

## 10.8 Compliance and Reporting

10.8.1 To whom and in what format should reporting occur?

- The Scheme Administrator would produce graphs on a hosted website for the following:
  - i. By State: % legal deliveries / % within tolerance / % over tolerance
  - ii. By State: all deliveries bell curve showing with the average and median results
  - iii. By Region: e.g. Mallee % legal deliveries / % within tolerance / % over tolerance – it is important that % only is reported, not tonnes or truck movements
  - iv. By Region: all deliveries bell curve showing with the average and median results
  - v. By Truck group: % legal deliveries / % within tolerance / % over tolerance
  - vi. By Truck group: all deliveries bell curve showing with the average and median results
- Reporting must consider commercial information and should never disclose truck movements or tonnes in geographies smaller than states
- Confidential Reports for all PGRs would also be produced
- Reports to Trucking Operators
  - i. A report detailing all deliveries to the registered truck owner for each individual truck detailing:
    - a. average weight of deliveries
    - b. number of deliveries legal / over the tolerance / illegal loads
    - c. percentage of deliveries legal / over the tolerance / illegal loads
  - ii. These trucks reports would be dependent on geographic region and the number of harvests in the region.

- iii. The reports would detail what action, if any is to be taken by the Scheme Administrator.

#### 10.8.2 How frequent should reporting be?

The Scheme Administrator should provide 2 reports per year for the summer and winter harvests. Live dashboards could be provided on website showing trends.

From a PGR data reporting perspective to Scheme Administrators, in Qld and SA reporting is daily for the previous day. NSW and Vic require monthly reporting of all data, and weekly for the previous week for overloads.

To allow the Scheme Administrator can give timely feedback to registered trucks when there are overloads, reporting should move to a maximum weekly frequency for all deliveries.

#### 10.8.3 How many instances of non-compliance can occur before the operator is removed from the scheme?

This is a matter for the Scheme Administrator to manage. Participation must be open to everyone and the Scheme Administrator must use warning letters and compliance activity to police the scheme.

The GTSN recommend that warnings should be done using the Victoria feedback process to registered truck owners using data analytics. Warnings and compliance must apply to all registered truck operators by registration number. This process must consider the number of deliveries so that operators that do many deliveries are not disadvantaged.

#### 10.8.4 Will the forfeiture to charity option for overloaded trucks be likely to improve compliance with the scheme? Can you suggest other options for dealing with excess loads?

GrainCorp and SunRice have used charity donation above the mass limit.

Currently, SunRice is the only PGR that uses the process. This process works well at SunRice because growers only have the option to deliver rice to SunRice, whereas with grain there is a lot competition, so growers have the option to 'shop' more lenient policies. SunRice would consider switching off charity if Scheme Administrator communications about overloads in NSW commenced.

GrainCorp started charity donation above the mass limit in NSW in 2013 and expanded it into Victoria in 2015. Recently, GrainCorp has progressively switched off charity donation in Victoria, with NSW being switched off for the 2019 harvest.

Elements of the charity donation concept do exist in the WA Harvest Management Scheme.

GTSN members do not support charity donation above the mass limit.

10.8.5 Should a national audit framework be implemented by the Scheme Administrator to audit all parties involved in the scheme?

This is a good idea to give PGRs feedback where their systems must be improved. The audit framework could be developed with the GTSN.

## 10.9 Routes

10.9.1 Should a HMMS network or pre-approved routes be established as part of the Scheme?

No. Trucks should be able to access the current network and the Scheme Administrator must work with councils and state bodies to resolve last miles that exist.

10.9.2 Should these networks or pre-approved routes be defined jurisdiction or should it be national networks?

N/A

10.9.3 Should the rule of delivery having to be to the 'nearest approved PGR' be implemented?

No. This is impossible for PGRs to police and causes confusion with on road compliance in some states.

## 10.9.4 Other issues

Remove the SA commodity routes and allow trucks to operate on the gazetted network to reduce complexity.

Requirements to weigh axles should not be included.

## 10.10 Timing

10.10.1 Should a national HMMS run all year round or be time limited?

Yes. A national HMMS should be based on commodity and area.

## 10.11 Other Issues

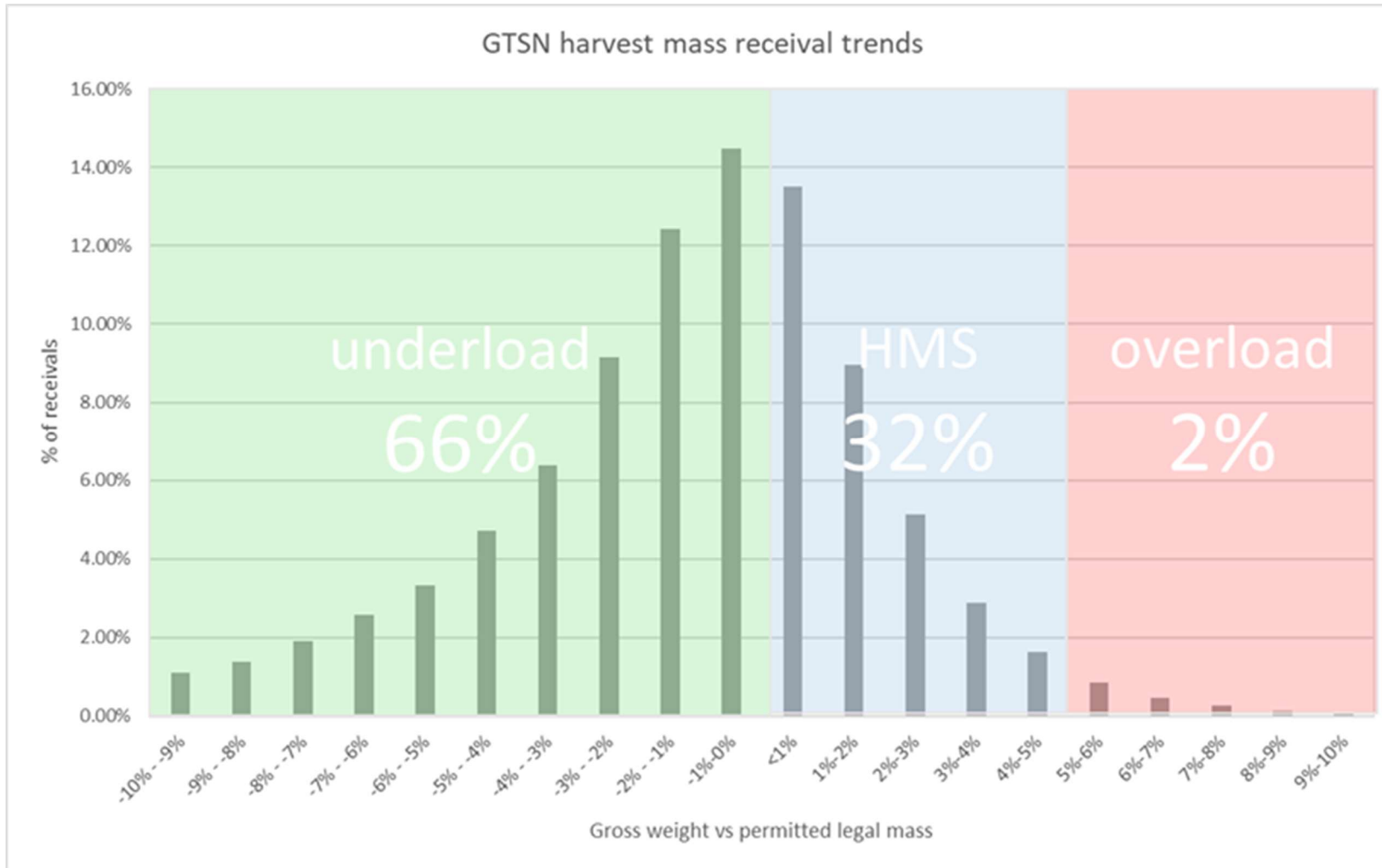


## 11 Appendix A: Summary of Proposed National HMMS recommended by GTSN

Table 1. Summary of Proposed National HMMS recommended by GTSN













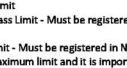
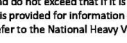

State	Notice name	Expiry	Routes	Mass	Vehicle
National	<i>National Harvest Mass Management Scheme Exemption Notice yyyy (No. 1)</i>	No expiry	Operation at concessional or higher mass is subject to the State's approved network routes.	<p>Exempts an eligible vehicle to which notice applies from the following mass limits in Schedule 1 of the MDL National Regulation.</p> <p>The loaded mass of a heavy vehicle operating under this notice must be <b>less than 105%</b> of normal Mass Limit.</p>	Mass Limit means the General Mass Limit, Concessional Mass Limit, Higher Mass Limit, Performance Based Standards Mass Limit and the means National Class 3 Heavy Vehicle 19m Truck & Dog Trailer Combination Mass Exception (Notice) 2014 (No 1) or the National Class 2 Heavy Vehicle B-Double Authorisation (Notice) 2014 (No.2)
Receiving Facilities reporting obligations	<ul style="list-style-type: none"> <li>Notification of mass breaches to vehicle operations at the point of receipt.</li> <li>Provision of all receipt data to the national Scheme Administrator periodically.</li> </ul>				
Regulator Operator Engagement	<ul style="list-style-type: none"> <li>Scheme Administrator provides feedback to registered owner of heavy vehicle on trends for overloading with potential penalties for non-compliance.</li> <li>Breach enforcement for heavy vehicle operators which are intentionally operating beyond the intent of the HMMS</li> </ul>				
Regulator Industry Engagement	<ul style="list-style-type: none"> <li>Scheme Administrator provide feedback to industry on mass management trends. Enabling a collaborative approach to be undertaken with industry to drive the intent of the HMMS.</li> </ul>				

## 12 Appendix B: Chart Showing Distribution of Gross Weight vs Mass Limit




# 13 Appendix C: GTSN Truck Chart

## Grain Transport Safety Network Truck Chart

		12.5m	19.0m	26.0m	36.5m	Grain Harvest Management								
Category	Code	Image	Description	GML	Vic RFS <sup>1</sup>	GML + Permit <sup>2</sup>	CML	HML	0.5mt Steer <sup>3</sup>	0.7mt Steer <sup>3</sup>	QLD <sup>5</sup>	NSW <sup>6</sup>	VIC <sup>7</sup>	SA <sup>8</sup>
Rigid Truck	1		Common 2 Axle Rigid	15.00	16.00						16.10		16.80	
Rigid Truck	9		3 Axle Rigid Truck	22.50	23.00		23.00 QLD +0.25t			✓	24.20	23.00	23.60	24.20
Rigid Truck	18		Common 4 Axle Twin Steer Rigid Truck <sup>9</sup>	27.50	28.00		28.00 QLD +0.50t				29.60	28.00	28.90	29.40
Truck & Dog	16		Common 3 Axle Rigid Truck and 3 Axle Dog Trailer <sup>10</sup>	42.50		45.00 NSW = 48.00t	43.50			✓	45.70	44.63		45.70
Truck & Dog	76		Common 3 Axle Rigid Truck and 4 Axle Dog Trailer <sup>11</sup>	42.50		50.00	43.50			✓	45.70	44.63	44.60	45.70
Truck & Dog	87		3 Axle Rigid Truck and 5 Axle Dog Trailer	PBS truck: Refer footnote <sup>12</sup>										?
Prime Mover & Trailer	3		4 Axle Semitrailer	31.50	33.00		32.00			✓	33.90	32.00	34.10	33.60
Prime Mover & Trailer	11		Common 5 Axle Semitrailer	39.00	40.00		40.00			✓	41.90	40.00	41.00	42.00
Prime Mover & Trailer	12		Common 6 Axle Semitrailer	42.50	43.00		43.50	45.50		✓	45.70	44.63	44.60	45.70
B Double	83		Common 7 Axle B-double	55.5	57.00	50.00 <sup>13</sup>	57.00			✓	59.70 <sup>14</sup>	57.00	58.30	59.90
B Double	68		Common 9 Axle B-double	62.50	63.00	62.50	64.50	68.00		✓	67.20	65.63	65.60	67.70
Road Train	28		Common 11 Axle Road Train (A Double) <sup>15</sup>	79.00			79.00	85.00		✓	84.90	83.00		83.00
Road Train	91		Common 12 Axle Road Train (A Double)	82.50			82.50	90.50		✓	88.70	86.63		86.60
AB Triple	88		Common 14 Axle AB Triple Road train and 2 Axle Dolly	99.00			99.00	107.50 QLD +1.00t		✓	106.40	104.00		104.00
AB Triple	96		15 Axle AB Triple Road train and 3 Axle Dolly	102.50			102.50	113.00 <sup>16</sup> QLD +1.00t		✓	110.10	107.63		107.60


**All masses are in metric tonnes**  
**GML** = General Mass Limit  
**CML** = Concessional Mass Limit - Must be registered in NHVAS mass and display sticker on driver's side of the truck  
**HML** = Higher Mass Limit - Must be registered in NHVAS + IAP in NSW and QLD and be on a HML route  
 Mass Limits are the maximum limit and it is important drivers know the Gross Combination (GCM) and Gross Vehicle Mass (GVM) and do not exceed that if it is lower than the mass limit  
**Legal Disclaimer:** data is provided for information only  
 Further information, refer to the National Heavy Vehicle Regulator [www.nhvr.gov.au](http://www.nhvr.gov.au) or [www.gtsn.com.au](http://www.gtsn.com.au)

**New NHVAS Mass Sticker**



Vehicle label dimensions: 100mm x 120mm

**Old NHVAS Mass Sticker**



<sup>1</sup> Refer Victoria Class 3 Road Friendly Suspension Mass Exemption Notice 2019 (No.1)

<sup>2</sup> Permit means National Class 3 Heavy Vehicle 19m Truck & Dog Trailer Combination Mass Exemption (Notice) 2014 (No.1) or National Class 2 Heavy Vehicle B-Double Authorisation (Notice) 2014 (No.2)

<sup>3</sup> 0.5t steer axle allowance applies to trucks with a Gross Vehicle Mass (GVM) over 15 tonnes fitted with specific technologies, including an engine complying with ADR 80/01 (Euro IV), Front Under-run impact Protection that meets UN ECE Regulation No.93 or ADR 84, and cabin strength that meets the requirements of UN ECE Regulation No.29.

<sup>4</sup> 0.7t allowance applies to Road Train and AB triple combinations fitted with super single steer tyres and that meet the requirements for the 0.5t steer allowance

<sup>5</sup> Refer Queensland Class 3 Heavy Vehicle (Grain Harvest Management Scheme) Mass Exemption Notice 2019 (No. 1) - note: Qld GHMS weights are maximum weights and 0.5t steer allowances do not apply when conditions are met. PBS do not qualify for GHMS.

<sup>6</sup> Refer New South Wales Class 3 Grain Harvest Management Scheme Mass Exemption (Notice) 2016 (No. 1) - 0.5t steer applies when conditions are met

<sup>7</sup> Refer Victoria Class 3 Grain Harvest Management Scheme Mass Exemption Notice 2017 (No. 1) Vic RFS Mass Limit - 0.5t steer applies when conditions are met

<sup>8</sup> Refer South Australia Heavy Vehicle Farm Gate Grain Transport Mass Exemption Notice 2015 (No.1) for trucks operating NHVAS mass to allow loading up to CML + 5% - 0.5t steer applies when conditions are met

<sup>9</sup> Trucks that do not have load sharing suspension must subtract one (1) tonne from the mass limit

<sup>10</sup> Refer code 87 footnote below

<sup>11</sup> Refer code 87 footnote below

<sup>12</sup> Trucks can operate as PBS vehicles under the National Class 2 PBS Level 1 & 2A Truck and Dog Trailer Authorisation Notice 2016 on routes with PBS 2A or higher access with the following maximum mass limits. PBS CML is the most common mass limit for these combinations in Grain. To operate as a PBS truck, the driver must present the Vehicle Approval, which includes the specific mass limit for that each individual vehicle combination:

Code	PBS (GML)	PBS (CML)	PBS (HML)
16	48.50	49.50	49.50
76	56.00	57.50	57.50
87	59.50	61.50	63.00

<sup>13</sup> On general access (non-B double) routes, GML = 50.0t and CML = 51.0t

<sup>14</sup> On routes with no B double access, Qld = 53.70t, NSW and Vic GHMS = 52.5t

<sup>15</sup> In Victoria, NHVR Access Permit required on pre-approved network, trucks can also operate on the PBS 2A network with CML at 72.7t and PBS 2A HML network at 76.7t

<sup>16</sup> NHVR Access Permit Required to Operate in South Australia

# 14 Appendix D: Example Pages of GTSN Truck Book

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Truck and dogs:

**76**

Common 3 Axle Rigid Truck and 4 Axle Dog Trailer



State	GML	RFS	CML	HML	Permit 20	0.5t Steer	0.7t Steer	PBS – GML	PBS – CML <sup>21</sup>	PBS – HML	GHMS
QLD		-									45.70
NSW	42.50	-	43.50	-	50.00	✓	-	56.00	57.50	57.50	44.63
Vic		?									-
SA		-									45.68

<sup>20</sup> Mass limits apply for trucks that comply with National Class 3 Heavy Vehicle (9m Truck and Dog Trailer Combination Mass Exemption Notice) 2014 (No.1) – GHMS concessions do not apply to permit mass limit  
<sup>21</sup> To operate as a PBS truck, it must have a Vehicle Approval and comply with the requirements of the National Class 2 PBS Level 1 & 2A Truck and Dog Trailer Authorisation Notice 2016 (No.1). PBS access is limited to the PBS 2A network – PBS 2A HML access is limited to the PBS 2A HML network only.

**76**



**68**

B-double:

Common 9 Axle B-double



State	GML	RFS	CML	HML	Permit	0.5t Steer	0.7t Steer	PBS – GML	PBS – CML	PBS – HML	GHMS
QLD											67.10
NSW	62.50	-	64.50	68.00	-	✓	-	-	-	-	65.63
Vic		?									-
SA		-									67.73

**68**



Quad:

**52**

Common 17 Axle BAB-quad Road train and 2 Axle Dolly



State	GML	RFS	CML	HML	Permit	0.5t Steer	0.7t Steer	PBS – GML	PBS – CML	PBS – HML	GHMS
QLD											
NSW	119.00	-	121.00	130.00	-						
Vic											-
SA											

**52**



AB-triple:

**66**

13 Axle AB-triple Road train and 3 Axle Dolly



State	GML	RFS	CML	HML	Permit	0.5t Steer	0.7t Steer	PBS – GML	PBS – CML	PBS – HML	GHMS
QLD			98.50 <sup>43</sup>	98.50 <sup>44</sup>							102.70
NSW	95.50	-	97.50	102.00			✓				-
Vic			-	-		✓	✓				-
SA <sup>45</sup>			97.50	102.00							102.38

<sup>43</sup> CML AB triples in Qld get another 1.0 tonne  
<sup>44</sup> HML < CML in Qld because no registrations have HML AB Triple access  
<sup>45</sup> NIVR Access Permit required to operate in South Australia

**66**

## 15 Appendix E: Definitions

**Scheme Administrator** means a central body that oversees a national harvest management scheme, preferably, this should be the NHVR

**Crops** are cereals, pulses, legumes, oilseeds and rice

**Completed Transaction** means transactions with a gross and tare weight for trucks that unload

**Mass Limit** means the General Mass Limit, Concessional Mass Limit, Higher Mass Limit, Performance Based Standards Mass Limit and the means *National Class 3 Heavy Vehicle 19m Truck & Dog Trailer Combination Mass Exception (Notice) 2014 (No 1)* or the *National Class 2 Heavy Vehicle B-Double Authorisation (Notice) 2014 (No.2)*

**MOU** means *Memorandum of Understanding* and describes the document that Receiving Facilities sign with the Scheme Administrator to participate in the scheme

**PGR** means Professional Grain Receiver – these are companies that unload trucks that load in a paddock without accurate weighing facilities

**Receiving Facilities** are companies with weighbridges that unload grain that loads in a paddock and include PGRs, feedlots, feed processes, private storages, flour mills, grain container packers and ports.