



NHVR
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Grain Harvest Management Schemes Review

I welcome the NHVR's review to consolidate some of the differences between states with regard to grain transport.

Who should the scheme cover?

If there is to be as 'scheme' that provides consistent parameters across states, then that scheme must cover every vehicle carrying bulk grain, regardless of GML, HML or other extra mass permits.

Mass Allowances

I totally disagree with this assumption in the discussion paper:

'As the intention of the scheme is to assist with practical difficulties in grain transport, operators who are using Concessional Mass Limits will not be eligible for the scheme. This is due to their ability to prove their trucks' weight with greater accuracy'

- Loading grain/oilseeds/pulses in a paddock is not an exact science for anybody, including those with the fancy scales
- Apart from managing the variable test weight of the bulk product, the location of the truck when being loaded can vary significantly
- **There is no weight scale perfection** in a paddock as the terrain is generally not flat, has uneven areas, large rocky outcrops and farm roadways are sometimes little more than a 'goat track'
- The variables are enormous

My preference for Mass Tolerance is up to 5%

- up to 5% on whatever the legal mass for that specific vehicle is
- be that HML, GML, CML on non-gazetted roads, or an individual permit for example on Dog Combinations
- up to 5% on every load would be easier than how we currently monitor it by the first 3 loads from any given paddock – its just too detailed to manage effectively
- Increase the penalty for those who do go over 5% on too many occasions.
- those states who have had higher tolerances may struggle with a decrease so I'm not against compromise over the percentage, but personally I do think 5% is sufficient

Structure

- Option 2. Harmonise existing state-based GHMS notices to create one HMMS national notice, and create one national HMMS. This would replace separate state-based GHMS

Registration

- Option 3. Both producers and grain transporters

Vehicle Types

- Any vehicle carting grain should be included, including PBS vehicles as I expect their purchase to increase over time due to their operational safety



- For our farm, when we need to purchase a new truck and trailer, it will be a PBS vehicle

Commodities

- I think this should ultimately include all bulk commodities, not just grain.
- It's just as difficult to load to correct weights when collecting various agricultural soil amelioration products such as gypsum and lime sand.

Timing

- Any scheme should run all year round as farmers store much more grain now than ever before so they can take advantage of a variety of market options and random times of the year
- Seasonal conditions dictate when grain harvest starts and stops and these seasonal conditions vary from region to region

Routes

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

- No – this will overcomplicate it for no safety gain

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

- Best left with local road managers as to HML approved routes or not etc. Roads are a very localised issue that the local council or shire know intimately

Should the rule of delivery having to be to the 'nearest approved grain receiver' be implemented?

- No, absolutely not

Compliance

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

- My information suggests the arrangements in SA have seen a gradual improvement in the incidence of severe overloads.

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

- With every receiver computerised, access to this data should be immediate. Grain delivery weigh notes are stamped with an overload warning in SA

To whom and in what format should reporting occur?

- Continuance of warning letters for certain levels of breach
- Grain receivers supply the details of serial offenders to the NHVR for prosecution and fines

How frequent should reporting be?

- During grain harvest period, it should be weekly
- Outside of this period, every 3 months



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

- If an operator collects grain from 4 different farms throughout the day, the test weight of each of those loads will be different, so this needs to be thought out some more. It's needs to be about the pattern of behaviour, not the number of overloading occurrences as a total

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

- No, I'm not keen. Just more regulation for farmers

Administration

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

- Regulatory body probably has the best resources to oversee

What powers should the Scheme Administrator have?

- Disciplinary action against those who continue to flout the tolerance

What roles should the Scheme Administrator perform?

- Investigate serial offenders of mass breach over 5%

What should the registration process look like?

- It should look easy! Basically, anyone who delivers grain should automatically be entered.

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

- History of breaches and obvious flouting of the mass tolerance

This is all I have time to contribute at this point but happy to discuss further. I have also spoken to David Smith from Smith Haulage at Tumby Bay about this matter and he and I do agree on many aspects of how we think this should work.

Feel free to contact me for any further questions, I'm happy to provide context from a grain farmer and a farm safety consultant's point of view.

Kind Regards

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This statement in your Discussion paper is not quite correct.

Structure – Page 7

South Australia does not currently have a GHMS, but runs a mass loading management concession for both general mass and higher mass limit operations. Under this concession scheme, operators are required to reduce their masses to GML or HML within three attempts per day

So just to clarify what we currently have in South Australia:

1. We have an old 'Grain Carriers Code of Practice' from 2011, that allows **3 loads from each paddock** to get it under the 5% and we need to show a decreasing pattern of weight within those 3 loads.

*Note - 3 loads from an individual paddock, not per day

Paddock Mass Loading Procedure: In view of the difficulties of achieving precise Mass Loadings of grain in the paddock, for example due to the variable water/starch content from day to day and/or the often uneven terrain which renders onboard weighing systems largely ineffective, the following procedure has been developed to enable road transport operators and other parties in the Chain of Responsibility to achieve C&E Mass Limit compliance:

1. When loading the first load on each truck from a given paddock on a given day, the truck driver is to direct the operator of the loading equipment about the volume of grain to load with the intention of achieving a load **within legal Mass Limits** for that vehicle on the route it will travel when delivering the grain.

2. The SA farm gate mass exemption gazette notice is a little contradictory as to who it applies to and it also only allows a 'tolerance' for the first and second loads (not 3).

In the 'purpose' it covers those running higher mass, but it then goes on to state a 'condition' of being in mass accreditation, which is not always the case with combinations like ours of a Quad Dog. Under the bridge formula rules, we can run to a higher mass limit (42.5 to 49.5 tonne) if we are accredited in NHVAS maintenance management. But we do not need to be accredited in mass management.

SOUTH AUSTRALIA HEAVY VEHICLE FARM GATE GRAIN TRANSPORT MASS EXEMPTION NOTICE 2015 (No. 1)

Purpose

(1) This notice provides exemptions for heavy vehicles operating under mass management accreditation, at concessional mass limits under the Heavy Vehicle (Mass, Dimension and Loading) National Regulation (the Regulation), or at higher mass limits from certain provisions of specified primary notices while transporting grain directly from a farm to a grain receiver.

Conditions

(3) A heavy vehicle operating under this notice must be operating under mass management accreditation.

(6) The mass allowed under subsection (5) is only applicable to the first and second load carried by a heavy vehicle from a given paddock on a given day.