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Reference: FILE 13/1635



18 October 2019

National Heavy Vehicle Regulator  
Grain Harvest Management Schemes Review  
**Via email: info@nhvr.gov.au**

To whom it may concern,

### **Grain Harvest Management Scheme – NHVR Issues Paper**

Moree Plains Shire Council reluctantly agreed to the introduction of the Grain Harvest Management Scheme (GHMS). GHMS is not an upper limit weight allowance. GHMS was only ever approved by MPSC as a tolerance for on farm loading errors. A Road Manager who allows limits above the design for GML without the inherent safety feature and road friendly driving conditions know that long term use would be detrimental to the other motorists and to their assets.

Moree Plains Shire Council was initially promised data from participating grain receivers but has only ever seen abridged generic overall totals from the scheme. This is not acceptable to MPSC. As our Shire is one of the largest agricultural producers in the country, our roads break up under the strain and our ratepayers and residents suffer. This scheme, if managed properly, could provide our Shire with the necessary data to use to secure additional funding and grants that are essential to allowing continued access to our 2,600km road network for our 15,000 residents.

Roads and Maritime Services quote that a heavy vehicle which is only 10% overloaded causes up to 50% more damage and therefore an additional 5% or 7.5% would cause accelerated pavement damage. Councils are responsible for over 86% of roads in Australia which must be maintained with only 5% of overall government revenue nationally and must therefore be entitled to see what actual increase in mass has resulted from the GHMS. It should be noted that any increase in mass limits or tolerances will obviously cause unaffordable maintenance costs for local councils and MPSC strongly objects to any further increases.

Mass limits above GML are available to compliant vehicles through PBS and HML concessions. It would be a gross contradiction to the whole transport industry if GHMS was increased above 5%. GHMS applies to 95% of heavy vehicles operating in the agricultural industry, however for all other transport operators not directly related to agriculture production, they are only allowed limits above GML after they have invested in PBS compliant vehicles, including smart tracking (through Intelligent Access Program), steerable rear axle, dual tyres on quad –axle group and road friendly suspension, as well as a range of safety features.

The additional safety features of PBS vehicles that are not required for GHMS are recognised as deficiencies by the proponents of GHMS. This is why the scheme only applies on the most direct route from the farm gate to the receivals depot.

Moree Plains Shire Council has attempted to address the safety issues by limiting speeds on unsealed roads and limiting access to dry weather conditions only. With 2000km of unsealed roads these limitations are significant but must be imposed to ensure that our roads are functional and safe for all road users.

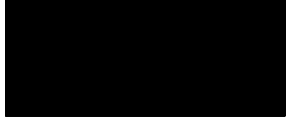
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An alternative to a National Law of GHMS would be to put a sunset clause on the State based GHMS concessions. This would send a clear message to the agricultural industry that it is financially beneficial for them to invest in the latest technology vehicles and leave their bone jarring, old leaf suspension at home or give their old Bedford to the museum.

MPSC objects to any additional increase to the GHMS limits currently set in NSW as 5% above General Mass Limit (GML). Thank you for the opportunity to make a submission to the National Heavy Vehicle Regulator in regard to the Grain Harvest Management Schemes Review.

Yours sincerely



Ian Dinham  
**DIRECTOR OF ENGINEERING**