



SOUTH AUSTRALIAN FREIGHT COUNCIL



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Grain Harvest Management Schemes Review
National Heavy Vehicle Regulator

Via electronic submission – info@nhvr.gov.au

Dear Sir / Madam

RE: Grain Harvest Management Schemes Review

On behalf of the South Australian Freight Council's (SAFC) Executive Committee and Membership I thank you for the opportunity to provide a submission on the Grain Harvest Management Schemes Review Issues Paper.

As you may be aware, SAFC is the State's peak, multi-modal freight and logistics industry group that advises all levels of government on industry related issues. SAFC represents road, rail, sea and air freight modes and operations, freight services users and assists the industry on issues relating to freight logistics across all modes.

After consultation with our members, grain industry stakeholders and trucking industry representatives, SAFC has come to two ultimate conclusions, that:

1. There is limited need for a National Grain Harvest Management Scheme (NGHMS); and
2. The South Australian mass loading concession scheme generally works well for South Australian operations, but could *potentially* benefit from minor 'tweaks'.

In the past, SAFC has taken strong positions in favour of national harmonisation of transport regulation (including the foundation of the three national transport regulators). However, we note that very little grain is transported from paddock to silo across jurisdictional borders, which is the primary area in which a NGHMS could provide additional benefit. No issues have been reported in the small number of cases where this does occur.

The South Australian mass loading concession scheme works well. For transport of grain from each paddock to silo each day, each operator is required to reduce their mass to within legislated limits by the third attempt, and not to exceed 105% loading at any time. We recognise that this can potentially be 'gamed' by claiming the grain comes from a different paddock, but approve of the principle of mass reduction over subsequent loads.

Mass is verified by grain receivers, who have robust processes in place where these conditions are not met. Chain of responsibility provisions ensure that receivers act responsibly – this interplay is not acknowledged in the issues paper.

The SA scheme is (relatively) simple to understand and to put into practice. It forces compliance quickly, while taking into account the natural weight change in grain that occurs day to day due to variable moisture content; and the lack of weighing options at origin (farm/paddock).

We have received no reports that the current 5% weight tolerance in SA is problematic. While we understand that tolerances are higher in other jurisdictions, we do not see a need for these to be increased. Maintaining this tolerance lowers unintended impacts on road assets in comparison to other jurisdictions, supporting the trucking industry's social licence to operate (particularly in relation to road managers).

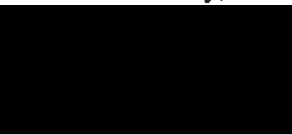
We have however received comments suggesting that receivers with operations in multiple jurisdictions do experience difficulties with training staff to multiple standards.

While SAFC is not (yet) convinced for the need for a NGHMS, we make the following comments in relation to potential design:

- Both producers and grain transporters must be able to register/access the scheme
- All receival sites should be required to be registered, to stop potentially unscrupulous operators/farmers from diverting overweight deliveries to non-participant sites.
- All potential combinations, including PBS vehicles must be included.
- The mass allowance limit should be 5% over the maximum permitted for a combination under GML, HML or CML as appropriate.
- Compliance and reporting requirements should be as minimal as possible, as COR (mass) provisions also interact in this space.
- Reporting should be from receival site to the regulator – with enforcement up to the regulator, not the receival site.
- Under no circumstances should a load be rejected – this puts an overweight load back out on the road, creating a risk to safety and breaking COR provisions of the HVNL.
- There should not be a specific HMMS network – standard/commodity access networks should apply.
- There should not be a rule of delivery to the nearest grain receival site. Farmers should be able to deliver/direct delivery to whatever location will deliver the greatest overall profit without restriction.
- There should be no requirement for NHVAS mass accreditation.

Again, I thank you for the opportunity to provide a submission on this important topic. Should you wish to discuss any element of this submission further, please feel free to contact me on

Yours Sincerely,



Evan Knapp
Executive Officer, SA Freight Council.