

# GRAIN HARVEST MANAGEMENT SCHEMES REVIEW

## Victoria's response to the NHVR Issues Paper

### General

#### Eligibility - Who and which vehicles should get access to the scheme?

- Department of Transport (formerly VicRoads) recommends that the National Grain Harvest Management Scheme (GHMS) should be open to:
  - any vehicle operator delivering any one of the listed commodities (list found in VicRoads GHMS Operating guidelines document <https://www.vicroads.vic.gov.au/-/media/files/documents/business-and-industry/grain-harvest-2019/ghms---operating-guidelines-19-20.ashx?la=en&hash=C7EB468ECD36277543F0AC25AB9EEB62>); but
    - only to those operators using an approved vehicle (an ADR80 compliant - 2002 or more recently built vehicle); and
    - excluding PBS vehicles, Road Trains and vehicles operating under another mass concession.

#### Policy settings - How should the scheme work and what kind of support should be provided?

- DoT recommends that the scheme be modelled on Victoria's current scheme (now into its third successful season) but managed and administered by a national governing body.

#### Delivery - Who should operate the scheme?

- DoT nominates the NHVR to take over the role of administrator from the state authorities.

#### What did and did not work well, and the reasons for this?

##### What has worked well?

- The Victorian GHMS has encouraged the use of newer vehicles by reducing the age of the fleet, which has resulted in improvements in safety, productivity etc.;
- The introduction of the Victorian GHMS has resulted in DoT developing a closer working relationship with bulk handler groups, with regular bi-monthly meetings and regular interaction re: pressing issues such as last kilometre gaps in HV networks (primarily six individual networks that facilitate the movement of grain - B-double, HML, PBS Level 1, PBS Level 2a, GHMS B-double and GHMS Semi/Rigid networks);
- GHMS-eligible vehicles have been the most utilized vehicles during the past three harvest seasons;
- The GHMS application process has progressed seamlessly through the first three harvest seasons; and
- Data recording, management and reporting has provided both DoT and the bulk commodity handlers with useful insight and allowed for a more target approach towards compliance management.

##### What has not worked well?

- While the peak state-based farmers organization, the Victorian Farmers Federation (VFF) has not opposed the GHMS, many VFF members do not have ADR80 compliant – 2002 or more recently-built vehicles; and
- Farmer and grain carrier involvement in Victoria's GHMS could have been significantly enhanced by more support from the VFF.

### **Anything you would like to change about the existing state-based GHMS?**

- The “not worked wells” plus the take up of GHMS administration duties by a centralized body; and
- The lack of cohesion across border – schemes differing by degrees on either side of borders, which creates confusion amongst handlers and transporters

## **Existing State-Based Harvest Management Schemes**

### **Barriers**

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

- There are no barriers to adopting the Victorian GHMS in its current state or as the basis for a national scheme. The only perceived barrier is the requirement of ADR80 compliance, restricting access to the scheme for pre 2002-built vehicles.

### **Compliance**

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

- Yes, the Victorian GHMS does. A review of the first two years of the Victorian GHMS has shown that participants are more compliance to their mass limit requirements than vehicles operating outside of the scheme.

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

- Yes, via Grain Receiving Sites/Handlers, rather than through the GHMS.

#### **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?**

- Grain Receiving Sites/Handlers are supplied with feedback regarding overloads (individual vehicles) on a monthly basis under the Victorian GHMS.

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

- Removal from the scheme.

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

- Yes, by not operating a compliant ADR80 post 2002-built vehicle.

#### **For grain receivers specifically – do you have any other applicable assurance processes?**

- Yes, DoT believes they do. Each has its own overload process that (they believe) meets COR legislation.

### **Benefits**

#### **Do you find the current GHMS effective and worthwhile? Why or why not?**

- Yes, three years in, the current Victorian GHMS has been successful thus far. Refer to introductory letter for rationale.

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

- Victorian GHMS recognises the difficulty of accurately loading grain onto trucks on-farm and has been designed to create some flexibility. The current scheme allows participants a 5% mass concession above the statutory General Mass Limit (GHML) for vehicles delivering grain to a participating grain receiver.
- DoT believes this mass limit of 5% above GML should be adopted nationally. Anything in excess of this limit would have a significant impact on the network, particularly rural roads.

## **Designing a National Harvest Mass Management Scheme**

### **Purpose**

**Is the stated purpose sufficient to ensure the efficient running, implementation and effective operation of a national Harvest Mass Management Scheme (HMMS)?**

- Yes, DoT supports each of the NHVR's stated objectives for a national HMMS, to:
  - ensure compliance with statutory vehicle mass limits as prescribed in the HVNL;
  - provide a level of support to assist with difficulties associated with grain transportation;
  - ensure the safe transportation of grain; and
  - manage risks to road infrastructure and public safety.

**Should any other objectives be listed?**

- Newer and safer vehicles in line with Victoria's Towards Zero Campaign.

### **Structure**

**The national HMMS may be created through one of three ways. Please indicate your preference for options 1, 2 or 3 and provide reasons:**

- DoT's preference is the third option – to develop a hybrid mode to accommodate different state requirements that is based upon Victoria's GHMS. The second preference would be to harmonise existing state-based GHMS notices to create one HMMS National notice which would replace separate state-based GHMSs.

### **Administration**

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

- A regulatory body. Victoria is adamant that the administration duties for any national scheme should be performed by the NHVR and not be outsourced to any third party such as Ag Force in Queensland.

**What powers should the Scheme Administrator have?**

- The same as currently applies within state jurisdictional administrations.

**What roles should the Scheme Administrator perform?**

- As listed above under the stated objectives.

**Should grain receivers establish operating procedures and a conditions guide specific to their site?**

- DoT would rather it was managed collectively, except for specific site access requirements.

## Registration

Please indicate your preference for either option 1, 2 or (regarding participants that may be required to register in the scheme). Please provide reasons for your response.

- Option 3: Both producers and grain transport operators carry grain, which is delivered to Grain Receival Centres. Therefore, both producers and grain transporters should be required to register in the scheme with a Scheme Administrator.

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

- No

**What should the registration process look like?**

- DoT suggests that the NHVR should replicate Victoria's process. See link here <https://www.vicroads.vic.gov.au/business-and-industry/heavy-vehicle-industry/farmer-and-agricultural-information/grain-harvest-management-scheme>

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

- By not meeting the conditions of participation on the application form.

**What, if any, mandatory obligations should be included as part of the GHMS national scheme?**

- As above, ADR80, and agreement not to carry loads to Grain Receival Centres that exceed 5% of GML.

## Commodities

**How should 'commodity' be defined in a new HMMS?**

- Compile and publish a comprehensive list of commodities to remove any doubt as to what can be carried.

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

- List – document on GHMS website <https://www.vicroads.vic.gov.au/-/media/files/documents/business-and-industry/grain-harvest-2019/ghms---operating-guidelines-19-20.ashx?la=en&hash=C7EB468ECD36277543F0AC25AB9EEB62>

## Vehicle Types

**Should any configurations be included or excluded from this list?**

- Yes. All road trains, combinations that operate under the Higher Mass Limits Scheme (HML) and vehicles that comply with Performance Based Standards (PBS) are not eligible for the Victorian GHMS and should not be eligible for any harmonised scheme. See this link for vehicles that are eligible for the Victorian GHMS and therefore should be eligible for a national scheme: [file:///C:/Users/moorexd/Downloads/Victorian%20Grain%20Harvest%20Management%20Scheme%20-%20Mass%20Limit%20Chart%20with%20Bulk%20Handler%20Codes%20\(1\).pdf](file:///C:/Users/moorexd/Downloads/Victorian%20Grain%20Harvest%20Management%20Scheme%20-%20Mass%20Limit%20Chart%20with%20Bulk%20Handler%20Codes%20(1).pdf)

**Should Performance Based Standards (PBS) vehicles be considered?**

- No.

## Mass Allowances

**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.**

- The exemption allowing operators running under the scheme to exceed General Mass Limits (GML) by 5% is the current allowance in Victoria and NSW. It has been capped at 5% in Victoria because of added stresses to the road network. Anything above 5% on a road that is not owned by the jurisdiction (local roads) would be difficult to negotiate. Additionally, a concession above 5% would mean participation in other mass concessions schemes such as HML would no longer be worthwhile for operators.
- Victoria has published a mass limit chart to assist operators with identifying if their vehicle is eligible for the Victorian GHMS. The following link gives an example of each vehicle combination eligible to operate under the scheme and the maximum mass they are able to operate at:  
[file:///C:/Users/moorexd/Downloads/Victorian%20Grain%20Harvest%20Management%20Scheme%20-%20Mass%20Limit%20Chart%20with%20Bulk%20Handler%20Codes%20\(1\).pdf](file:///C:/Users/moorexd/Downloads/Victorian%20Grain%20Harvest%20Management%20Scheme%20-%20Mass%20Limit%20Chart%20with%20Bulk%20Handler%20Codes%20(1).pdf)

## Routes

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

- Yes. As in Victoria, gazetted routes (rather than pre-approved routes for permit – this should only be a backup for access to municipalities that have not yet gazetted some or all roads) have been established and mapped – see link to Victoria’s GHMS Semi/Rigid network <https://vicroadsmaps.maps.arcgis.com/apps/webappviewer/index.html?id=6cea6f111607493680ea3d33fa2eea9d> and GHMS B-double network <https://vicroadsmaps.maps.arcgis.com/apps/webappviewer/index.html?id=f0fb4770ecf74e48a2bf6eba612c7fac>. Mapping gazetted networks should be a key part of the any national harmonised GHMS.

**Should these networks or pre-approved routes be defined jurisdictions, or should they be national network**

- National.

**Should the rule of delivery having to be to the ‘nearest approved grain receiver’ be implemented?**

- No. Access to any grain receival facility should be permitted to approved operators so long as they are using gazetted/mapped routes or pre-approved routes outlined in a permit.

**Should any Restricted Access Vehicles (RAV) operating under the HMMS must comply with applicable RAV routes?**

- Yes, this is a given. This is what Victoria has implemented and what a harmonised scheme should require.

## Timing

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

- Yes, the GHMS should be limited to exclude winter. The principal reason for this is for network and asset protection. Most of the roads used to deliver grain to receival centres in Victoria (and most grain growing areas in the county) are locally-managed roads. Victoria also received advice from the Municipal Association of Victoria (MAV) stating that Local Government would not allow this added mass on their roads during the winter months (outside of the current GHMS season of 1 October to 1 May.)

## Participating Grain Receivers

- As is done in Victoria, DoT recommends that any national scheme administrator adopt the action of publishing a list of grain receivers participating in the scheme. This list could be amended as receivers enter or leave the scheme. In addition to a published list of participating grain receivers, it is also suggested that the individual grain receipt centres operated by the participating grain receivers be shown on mapped networks - see <https://vicroadsmaps.maps.arcgis.com/apps/webappviewer/index.html?id=6cea6f111607493680ea3d33fa2eea9d> to view silo symbols representing receipt centres.