

21 October 2019

National Heavy Vehicle Regulator
PO Box 492
Fortitude Valley QLD 4006
Via info@nhvr.gov.au.



To whom it may concern,

RE: Grain Harvest Management Schemes Review

On behalf of the Victorian Farmers Federation (VFF) Grains Group, I would like to thank the National Heavy Vehicle Regulator (NHVR) for the opportunity to comment on the Grain Harvest Management Schemes Review.

Grain harvest management schemes provide growers a tolerance for in-paddock loading, recognising the difficulty of accurately loading trucks on-farm with grain while maintaining road safety.

An effective harvest management scheme can allow for an efficient grain harvest while eliminating overloading on our roads through appropriate administration procedures and compliance activities, improving the efficient movement of grain and reducing the number of trucks on the road.

The VFF therefore conditionally supports replacing separate state-based Grain Harvest Management Schemes with a national grain transport management scheme, and makes the following recommendations for the development of a harmonised scheme:

1. The pursuit of regulatory harmonisation across jurisdictions does not lead to any adverse outcomes for participating jurisdictions

Whilst the VFF believes that national harmonisation of heavy vehicle regulation is vital for reducing red tape and facilitating cross-border freight movements, the VFF does not support any moves towards harmonisation which would ultimately reduce the efficiency or productivity of Victorian agriculture production and transportation.

2. Remove ADR 80 as an eligibility requirement for any harvest management scheme

Currently, only vehicles manufactured after 1 January 2002 and compliant with Vehicle Standard (Australian Design Rule 80/00) are eligible to participate in the Victorian Grain Harvest Management Scheme. Whilst the VFF is supportive of moves towards more environmentally friendly and safer trucks, we strongly oppose the use of ADR 80 as an eligibility requirement in any harvest scheme.

As the average age of the Victorian truck fleet is 29 years, very few trucks are eligible to participate, resulting in very low participation of the scheme. This requirement particularly penalises primary producers who often cannot afford to purchase newer heavy vehicles and undermines the core intention of the scheme to provide flexibility for growers loading trucks on farm.

3. Remove registration requirement for stickers to opt into the scheme

The VFF does not support the current Victorian requirement to register to participate in the GHMS.

To operate under the Victorian GHMS, operators are required to display a sticker confirming eligibility on the front left-hand side of the windscreen. Registration is only additional red tape for growers, with little demonstrated benefit.

The VFF would instead urge NHVR to explore New South Wales' current model in which transporters are not required to register.

4. There should be no requirement for delivering to the 'nearest approved grain receiver'

The VFF does not support any stipulations for delivering to nearest approved grain receiver as this has potential negative implications for market competition.

A key benefit of the current Victorian GHMS is that operators have the option to travel to a participating grain receiver of their choice, as long as the grain receiver accepts the type of grain being delivered.

5. Trade and Government investigate training and technological options to improve data accuracy

Accurate data collection is critical for providing feedback to trucks participating in the scheme.

A number of growers have contacted the VFF after incorrectly receiving warning notices from last season's grain harvest management scheme. The

VFF strongly support grain receival sites' efforts to provide increased training to their staff and urge industry and government to explore technological options such as radio frequency identification tags, optical character recognition and block chain to improve data accuracy.

Please contact Grains Policy Advisor, [REDACTED] should you have any further queries.

Yours sincerely,

A black rectangular redaction box covering the signature of Ashley Fraser.

Ashley Fraser
President,
Victorian Farmers Federation Grains Group