28 August 2013

Review of the Application of the IAP
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000

REVIEW OF THE APPLICATION OF THE INTELLIGENT ACCESS PROGRAM

The Australian Livestock and Rural Transporters Association (ALRTA) and the Livestock and Bulk Carriers Association of NSW (LBCA) welcome the opportunity to comment on the proposed formal Review of the Intelligent Access Program (IAP). The Review demonstrates a clear acknowledgement by the NTC of increasing industry concerns in this important area.

At the outset, we can’t stress enough that the key challenge for the NTC and an essential aspect of the Review is to be bold and deliver a broader route assurance solution that considers where route assurance is actually required and then the type of assurance needed.

It is critical to move away from an obsession of applying the IAP to HML access and then attempting to “tweak” the IAP around a system that has proved simply ineffective and unworkable in the majority of business applications.

Instead, a more holistic outcome must be delivered, which suits both Industry and Government. Unless this is achieved, we believe Industry support will not be forthcoming and the Review outcomes will be seen as a bandaid fix for a system that has already been in the main, dis-credited. We need to start again with an industry/government agreed approach to the use of telematics which includes trials, transition arrangements and achievable performance standards.

The ALRTA and LBCA want to work with the NTC to ensure an effective and positive outcome is achieved. We congratulate the “co-design” approach NTC pursued through the NTC Heavy Vehicle Charges Review process and encourage that the same approach be adopted in this important Review.

HML Access in NSW and the IAP:

A key application of the IAP in NSW is as a mandatory operational requirement for transport businesses operating at Higher Mass Limit (HML) weights on NSW roads. The NSW approach is not part of a nationally consistent approach, NSW and QLD are the only States that require IAP to be fitted to conventional (as opposed to special purpose) vehicles.

When considering the facts, the application of IAP for HML is perplexing and unfair:

- Firstly, as we understand, IAP was originally designed to manage the potential risk of sensitive infrastructure being exposed to very heavy vehicles, plant and equipment due to unusual mass or weight distribution, not as an application to HML.
In order for a business to gain access to HML there is already a number of key eligibility criteria imposed (including accreditation, suspension maintenance, fitment of ‘road friendly suspension’ etc). The IAP is separate and additional to the pre-existing ‘compliance assurance’ framework and is not integrated in anyway.

HML weights were agreed Nationally on the back of the introduction of road friendly suspension (RFS), which Industry was informed eliminates any additional road wear impact. Industry made a huge investment in RFS, on the promise that HML would be delivered.

It is widely accepted that semi trailers and B-Doubles accessing HML with RFS creates no additional wear to roads than vehicles operating at General Mass Limits (GML) with no RFS.

Further, HML has the potential to deliver a huge productivity gain for Australia. However, due (in part) to the requirement to fit IAP for HML in NSW in particular; the success of this reform has unfortunately stagnated.

The negative productivity impact in NSW can be delineated between a comparison of Victoria (does not require IAP on HML trucks) and NSW (does require IAP on HML). A review of data from the Australian Bureau of Statistics (ABS) between 1999 – 2010 shows the total number of trucks registered in Victoria up by 46% (2% in NSW), the average kilometres travelled down by 2% (increased by 2% in NSW), the total tonne kilometres travelled up by a huge 103% (down by 21% in NSW) and the total load carried in tonnes up by 55% (up by 22% in NSW).

A key point of interest is the difference in total tonne kilometres travelled between Victoria and NSW of 103% to negative 21%, respectively. This is a significant productivity gain for Victoria. It also shows a reduction in average kilometres travelled, while an increase was experienced in NSW. Increasing the number of trucks operating at HML improves productivity and reduces truck movements.

**POSITION:** The fitment of the IAP should not be a requirement for HML access. HML with RFS (semi and B-Doubles) should be allowed to operate on the same network as GML trucks, with load limit signposting to be undertaken as necessary.

**HML, Local Councils and IAP:**

Another pivotal issue regarding HML access in NSW (in addition to the requirement for IAP) is that we do not currently have a workable HML network. While State roads have seen a significant increase in HML, the local “first and last mile” supply chain links are still key stumbling blocks to achieving optimal efficiency.

In respect to the IAP, a key argument being sold to transporters in NSW is that local Councils are supportive of increasing HML access on the basis of IAP being a requirement. We believe Council’s perceived interest in IAP is the product of misguided leadership and lack of appropriate education regarding the impacts of HML trucks fitted with RFS on road wear.
Councils’ key concern is to minimise road wear impacts. However, as outlined above, HML with RFS doesn’t create road wear in fact it minimises road wear by reducing the number of truck movements. It also reduces noise and pollution overall leading to a greater community environment.

Additionally, reports from operators “on the ground” who have actually applied to local Councils for HML access with IAP have shown little evidence of their suggested support. A recent access campaign undertaken by a respected NSW operator revealed that on HML application to over forty Councils, their business received only one approval. The IAP is not the issue nor is the answer to HML access.

Sadly, we do know that some of the alleged increased in the use of IAP is based on specific permit access rules imposed by Government rather than the delivery of a productivity/commercial gain for HML access. Put simply, IAP was imposed in their permit as a requirement whether HML was involved or not. These businesses would not have installed IAP for business reasons nor genuine route assurance reasons. It is also clear (from documented cases as mentioned above) that Councils aren’t more supportive of HML based on IAP.

From our perspective, the investment in IAP should be transferred from misguided scare tactics to making appropriate investment in educating Councils and working with Councils to assess and fix last and first mile HML access blockages.

Route assurance shouldn’t be an issue for semi trailers and B-Doubles operating at HML with RFS. Transport operators don’t want to deviate off the most efficient route and importantly for our members with purpose built equipment, their movements from pick up and drop off point can be easily tracked through the commodity they cart.

It is a quandary for Industry as to why HML access and its improved productivity outcomes are not achieved in NSW.

**POSITION:** In general, the IAP does not deliver improved HML access on local roads nor does it deliver different road wear outcomes. Greater investment must be made in working with local Councils to provide education on truck impacts and provide assistance to fix HML access where needed.

**More Holistic Basis to Route Assurance:**

One of the key outcomes of the NSW Review was the opportunity to get existing systems used by operators assessed and approved by Transport Certification Australia. This is in principle a positive step towards broadening the equipment scope beyond current IAP approved devices and we support this outcome, however we are yet to see if there are any positive results from this review.

Specifically, we understand approx three companies were being trialled by TCA however we have not received further advice as to whether the systems were approved. Also, we are unaware of the guidelines that underpin their assessment.
It is imperative the assessment guidelines are made available to industry for review and scrutiny and that they match an appropriate “compliance” accreditation framework based on the vehicle configuration and task it is being used to perform.

The ALRTA and LBCA believe the current Review needs to build on the work completed in the NSW Review. Importantly, we suggest the following:

- That the IAP’s application must be reduced to its original purpose ie. managing specialised very heavy vehicles that pose a significant risk to sensitive infrastructure due to their unusual mass or weight distribution.

- A strategic approach must be developed to managing a minority of instances where the combination of the road freight vehicle and a particular NSW road asset limitation actually requires a route assurance management system in place.

The methodology for establishing route assurance should be complementary to the existing ‘alternative compliance’ accreditation framework.

We do not believe a route assurance system needs to be in place for semi trailers and B-Doubles with RFS operating at HML.

- Where a route assurance requirement is established, this should be able to be achieved by a number of mechanisms based on the vehicle’s risk category. The levels would be attached to a vehicle combination based on the risk profile it presents. A draft suggested risk matrix is provided at Attachment I.

- Where an existing system is to be assessed, it is imperative that the system requirements are made known to Industry so an accurate review can be conducted. Don’t make it too difficult that it can’t be achieved and ensure it is a strategic approach, built into the appropriate compliance framework for its application.

- Impose the IAP on those caught breaching mass limits (see Attachment I). IAP is provided to all Courts to be applied as part of a supervisory intervention order. This means, if an operator is found to have significant issues within their business, IAP can be mandated to monitor that business for compliance.

**POSITION:** Put simply, we need to fix HML access in NSW and work with local Government (and other road owners) to improve education regarding HML access and fix key infrastructure issues where necessary.

Where route assurance is required (not for HML access for Semi’s and B-Doubles), existing systems and technology should be utilised by risk category and assessments of systems/technology must be based on transparent and appropriate guidelines that meet the appropriate compliance framework for its application. We need to enforce the law and mandate the use of the IAP on those found not to be compliant.

**About the ALRTA and LBCA:**
The ALRTA is the peak National body representing rural transport companies who provide the ‘first and last’ link of the supply chain for Australia’s agricultural industries and communities across regional, rural and remote Australia.

The LBCA is the NSW State body of the ALRTA and represents over 220 livestock and bulk road freight carriers Australia wide, who use NSW roads, primarily to service NSW regional industries.

The ALRTA and LBCA provide a representation and advocacy service for members to ensure they can operate in a safe, profitable and sustainable industry.

ATTACHMENT I

Table 1: Draft Route Assurance Risk Management System

*Inputs: vehicle combination, road type and infrastructure type.*

<table>
<thead>
<tr>
<th>LEVEL</th>
<th>ROUTE ASSURANCE</th>
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| 1     | No additional route or load assurance required  
(eg. semi trailers and B-Doubles operating at HML with RFS). |
| 2     | Paper based system  
(eg. similar to South Australia) |
| 3     | Existing operator system or accreditation system  
(eg. NHVAS Mass Management module) |
| 4     | Existing telematics system  
(eg. appropriate assessment guidelines to be developed) |
| 5     | The IAP  
(eg. specialised very heavy vehicles and high risk asset management) |
| 6     | Supervisory Intervention Order  
(eg. Mandating the IAP or could include any other proposed levels). |

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