2 May 2016

Review of Productivity Initiatives – Twin Steer, Tri-drive & Quad-axle
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000

via email: skannan@ntc.gov.au

Dear Mr Kannan

PROPOSED AXLE-RELATED PRODUCTIVITY IMPROVEMENTS

I write to provide comments on several NTC proposals relating to:

- Twin Steer prime movers;
- Tri Drive prime movers; and
- Quad Axle Groups.

General Comments

In recent years there have been improvements in vehicle standards, equipment quality, road infrastructure and compliance levels within industry. It is logical to periodically re-examine mass allowances on existing axle configurations or relatively under-utilised possibilities.

PBS has demonstrated that it is possible to lift productivity without reducing safety. The ALRTA considers that all of the NTC axle-related proposals are good candidates for future availability outside of PBS.

One of the main benefits of increasing mass for combinations with additional axles is for import / export work with containers being delivered to and collected from ports. Additional mass allowable on larger combination axle groups may also be useful for managing the risk of overloading in circumstances in which mass is capped but difficult to estimate (e.g. livestock loading schemes in some states or grain harvest mass management schemes where trailers are often loaded on uneven ground).

Vehicles with additional axles will still pay their own way with registration charges now based on equivalent standards axle (ESA) calculations. This effectively means that such vehicles are over charged if not allowed to be used to their full potential.

Any new allowances should also extend to HML at the outset to get the best productivity outcome and to avoid another debate about this particular issue at a later date. The increased cost of using additional axles at GML is not particularly attractive compared with using lower cost traditional axle groupings at HML.
Twin Steer Prime Movers

ALRTA has examined the four options contained in the NTC discussion paper and supports Option 3:

- **Increase the allowable mass limit for twinsteer prime movers towing a semitrailer to the sum of the axle masses (47.5 tonnes GML and 50.5 tonnes HML) with a twinsteer limitation of 11 tonnes.**

It is worth noting that 11 tonnes is consistent with allowances in WA, NT, TAS and VIC under either the MDL regs or various notices / permits. Given the configuration has been operating safely for some years now it is reasonable that it should be generally available without PBS or a permit.

At the very least, twin steer vehicles should be able to operate at 11t when operating with load sharing suspensions.

We agree that the preferred approach is the ‘sum of axle masses’ rather than a total GCM restraint so that any future changes to individual axle groups can be catered for more easily.

We believe that demand for twin steer prime movers in the rural sector would increase if the additional mass was allowed without the additional red tape and cost imposed by PBS or the permit/notice system.

For the option to be attractive for operators, it needs to be allowable at HML weights and not restricted to GML weights only.

It is also important that to ensure that this reform does not jeopardise separate moves to increase single steer mass limit from 6.0t to 7.0t where a 385/65R22.5 wide aspect tyres are used. i.e. the solution for problems with steer axle mass is NOT to require all prime movers to have twin steer.

Tri-Drive Prime Movers

ALRTA does not agree that there is no demand for additional mass on tri-drive prime movers.

Firstly, demand would increase simply as a result of the additional mass allowable.

Secondly, there are some particular problems for which tri-drive could be of assistance. For example, we are aware of an operator that regularly experiences problems with overweight or skewed weight imported containers that need to be delivered to rural areas, with up to a 650 kilometre lead. The imported containers are filled with fish food (dead fish such as sardines or pilchards) for use in aquaculture and are subject to biosecurity / quarantine rules which prevent them being opened (or destuffed) until they reach their destination.

Once the container is loaded onto a vehicle, there is little that the driver can do if the container is heavy at one end. The additional mass allowable on a tri-drive group can help with total mass, and in particular, help if the container is skewed and the heavy end is loaded over the drive axles.
Interestingly, at general mass limits, the addition of another driver axle with 4 tyres (46.0t) would deliver a lower GCM than the addition of another steer axle with only 2 tyres (47.5t – see section above). This underscores the need to make sure that HML is allowable to make the best use of the additional drive axle (at HML twin-steer = 50.5t; tri-drive = 51.0t).

ALRTA therefore recommends an increase in the allowable mass limit for tri-drive prime movers towing a semitrailer to the sum of the axle masses (46.0t tonnes GML and 51.0t tonnes HML).

**Quad Axle Groups**

ALRTA supports the proposal to allow quad-axle groups in semi-trailers and in the A trailers of B-double combinations to operate without PBS approval at:

- 24t GML; and
- 27t HML.

It is generally considered across the rural sector that quad axle groups are safer and more productive for tasks that have long stretches of straight road with limited tight turning.

While ALRTA would prefer the quad axle option to be available for appropriate applications with minimal restrictions, if the engineering analysis indicates that quad axle groups might be problematic, it may be reasonable to address these concerns by requirements road friendly suspension and a steerable rear axle.

If your office would like to discuss this matter in more detail, please contact the ALRTA Executive Director, Mathew Munro, on (02) 6247 5434 or mathew@alrta.org.au

Yours sincerely

[Signature]

Kevin Keenan
National President