18<sup>th</sup> July 2021

Marco Mens Marco Mens Transport 1142 Narrewillock-Quambatook Rd GLENLOTH EAST VIC 3527

National Transport Commission

To Whom it May Concern

I am writing to highlight some of the ongoing issues I face as an Owner Driver in the state of Victoria. I operate a B-Double tipper set, carting agricultural products, predominantly grain (wheat, barley etc) throughout Victoria.

The state of Victoria offers a registration concession to Primary Producers which gives farmers an 80% registration discount. For an Owner Operator like myself, with a prime mover, B-Double tipper, and flat top set, this would equate to a \$14,989.00 (+ TAC charges) discount if I were a Primary Producer.

I understand the reason Primary Producer registration was introduced. It was to allow for the fact that farm trucks were generally used locally and as such would do far less kilometres on the road network.

In the last 5 to 10 years the growth in Primary Producer registered trucks on our roads has exploded. When they are not carting their own produce, these trucks are on the road carting produce on a commercial basis.

Recent attempts by VicRoads to clamp down on this practice has fallen over during the court process, due to a loophole in sloppy legislation (which in my opinion should have been tightened up long ago). A more recent development because of the failure to clamp down on this concession, is that transport operators with no farming interests are registering their equipment with Primary Producer concession under the Guise of "we are carting agricultural products".

In conclusion Primary Producer registration has led to a distortion in the transport industry. Commercial operators like myself, are now subsidising farming groups to run trucks (even encouraging) on a discounted basis. Many commercial operators feel they have no choice but to register their equipment with the Primary Producer concessions, so they remain competitive.

Are these subsidies coming out of road funding? If so, this would explain the deterioration in our road network.

Are these subsidies by the state government funding anti-competitive behaviour in the transport industry?

Regards

Marco Mens