

National Transport Commission
Public submission – Easy access to suitable routes
Level 3/600 Bourke Street
MELBOURNE VIC 3000.

16/08/2019

To whom it may concern,

Re: Easy access to suitable routes

The Victorian Farmers Federation (VFF) welcomes the opportunity to comment on the National Transport Commission's Easy Access to Suitable Routes.

Access to suitable routes remains a critical challenge for farmers transporting the 80 million tonnes of agricultural output produced each year in Australia, worth an estimated \$60 billion to the economy.

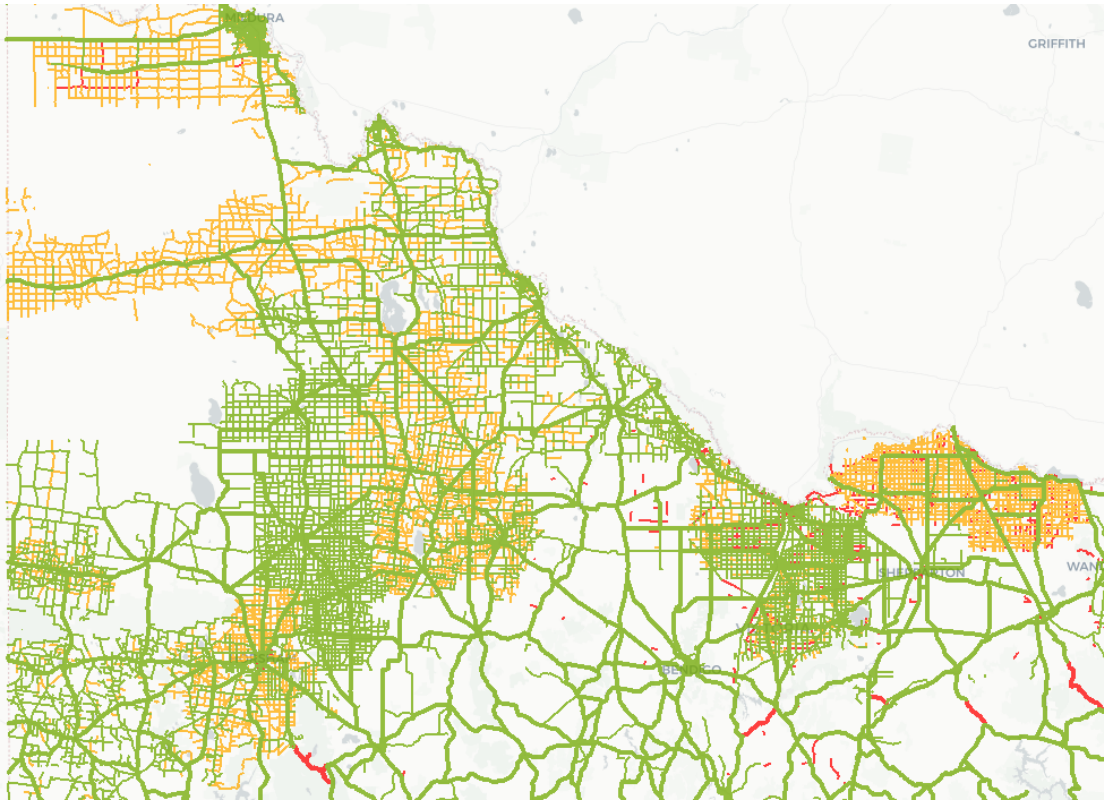
Agricultural supply chains are often characterised by their complexity, with an estimated 332,000 unique origin to destination paths and significant distances between production, processing and markets.

According to CSIRO TraNSIT estimates, road transportation for agriculture costs over \$5.2 billion each year, with the grains industry accounting for \$2.15 billion alone.

Improved regulation, however, has the potential to substantially reduce logistics costs. For example, increasing access for High Productivity Freight Vehicles (HPFVs) could significantly improve the efficient movement of agricultural freight to market. Whilst sections of the Victorian road network are currently capable of carrying HPFVs, in practice the ability of both agricultural and other industry freight operators to utilise higher mass vehicles is often inhibited by the attitudes of individual road managers.

In particular, the VFF would like to focus on the role of local government, which has been elevated under Heavy Vehicle National Law (HVNL). Whilst the law requires access requests to be made to the National Heavy Vehicle Regulator (NHVR), final decisions on access and any conditions on access are made by the road managers. As the road managers of local roads, local governments are therefore now responsible for approximately 85% of Victoria's total road network.

As the following map of the b-double network in North Western Victoria highlights, despite being the most common configuration of transporting agricultural freight, even b-double access varies significantly between councils.



Source: <https://vicroadsmaps.maps.arcgis.com/apps/webappviewer/index.html?id=636d0f14807e4b13a3414b8d48a56c0f> [accessed 24/6/2019]

Clearly, whilst some councils to the North West have gazetted nearly their entire road network for b-double access [green and yellow routes], in neighbouring shires few non-arterial roads have been gazetted.

This is clearly contrary to COAG's original objective in establishing a national regulatory system of delivering 'a seamless national regulation of heavy vehicles that achieves the same outcome in the same circumstances; and consistent and streamlined administration and service provision for the regulation of heavy vehicles'.

There are countless cases in regional Victoria of b-double gazetted roads stopping at shire boundaries, highlighting the at times arbitrary manner in which heavy vehicle access is determined.

It is clear that many rural local governments lack the resources and expertise to sufficiently evaluate the impact of road access decisions on the supply chain.

For example, many regional shires in South West Victoria have very few b-double gazetted local roads despite the increased production of grain within their regions necessitating heavy vehicle movements.

As noted in the NTC Access paper, this does not reduce the need for trucks, but instead forces less efficient truck movements or creating significant additional regulatory burden for farmers who must apply for permits to transport their grain to market. Alternately, it creates regulatory failure where drivers are unwittingly put in legal breach when

they cross an 'unmarked lines' that reside on a regulators web page.

It is important to note that the transport of bulk commodities such as grain associated with broadacre farming differs from other industries, in that heavy vehicle access is required for multiple locations and will vary year to year rather than the traditional fixed collection point of a factory or warehouse. Many farmers in South West Vic have reported needing 30-40 permits and faced delays between eight months and two years in permits approvals. This is not a viable system during key production times such as harvest.

The VFF urges the NTC consider the following recommendations to improve heavy vehicle access:

- Apply access decisions as broadly as possible to reduce regulatory burden.
- Place greater onus on road managers to provide evidence as to why heavy vehicle access has been denied and the ability of decisions to be externally reviewed.
- Introduce maximum times for road managers to provide or deny consent and greater incentives and consequences for road managers to meet decision making time frames.
- Provide centralised resources for local governments to ensure a more consistent approach to heavy vehicle access such as a dedicated officer in each state to work with councils to provide advice on heavy vehicle access.

Whilst outside the scope of HVNL, it is critical that additional funding is provided for regional councils to assess roads, bridges and culvert infrastructure. This would provide councils with a better understanding of their road networks and increase heavy vehicle access and timely permit approvals.

Please do not hesitate to contact me on 03 9207 5538 if you would like to discuss this matter further.

Yours sincerely,



David Jochinke,
President, Victorian Farmers Federation