

Submission to the National Transport Commission (NTC)

For the Review of National Transport Commission Review Easy Access to Suitable Routes

Close Date 16th August 2019

Oversize Over mass (OSOM) Access Arrangements pertaining to the Oil & Gas Industry in Australia

INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

AUSTRALASIAN CHAPTER

ABN 58 181 124 763

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1 | Page

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EXECUTIVE SUMMARY

This submission examines how better coordination and planning systems in conjunction with technology and working with Government could address process and capacity constraints of OSOM movement of gas drilling industry vehicles experienced by our membership.

Drawing on current industry experience and the extremely frustrating process of moving drilling Rigs in Australia and across borders, culminating in one-on-one meetings with over 100 individual drilling and support companies, this paper recommends immediate and long-term responses to improve current processes, to better support the issue of OSOM permits within a reasonable timeframe without compromising safety.

The paper examined the entire permit process from the time of submission to delivery of a decision, including the influence of the NHVR, Road Authorities and Road Managers, inter/intra state travel, freight type, especially resource and agricultural freight, as well as regional and remote freight.

The Paper has shown how important and essential the movement of OSOM loads is to Australia's economic prosperity and confirmed that a national approach by all tiers of government and industry is required to address the barriers that are preventing timely assessment and processing of access requests.

The Review has aimed to assess and, where possible, quantify the productivity, asset management and safety impacts of existing access arrangements for OSOM vehicles.

The movement of drilling rigs should not be constrained by borders.

The aim is to provide consistency and predictability for heavy vehicle access to improve OSOM movements and productivity should be the underlying objective.

End user experience should be of a high quality and consistent regardless of the jurisdiction or the route being proposed.



Contents

	2
_ABREVIATIONS	4
BACKGROUND	5
CONTEXT OF THE REVIEW	6
SCOPE OF PAPER	7
APPROACH	8
EXPERT REFERENCE GROUP	8
ENGAGEMENT	9
RELATED WORK	9
ISSUES	10
DISCUSSION	11
IMPROVING THE SYSTEM	11
NEED FOR ACTION	12
EXISTING ACCESS FRAMEWORK	13
PERMIT PROCESS	15
CAPABILITY AND RESOURCING	18
LOCAL GOVERNMENT	18
RECOMMENDATIONS	22
	EXECUTIVE SUMMARY ABREVIATIONS BACKGROUND CONTEXT OF THE REVIEW SCOPE OF PAPER APPROACH EXPERT REFERENCE GROUP ENGAGEMENT RELATED WORK ISSUES DISCUSSION IMPROVING THE SYSTEM NEED FOR ACTION EXISTING ACCESS FRAMEWORK PERMIT PROCESS CAPABILITY AND RESOURCING LOCAL GOVERNMENT RECOMMENDATIONS



ABREVIATIONS

ABS	Australian Bureau of Statistics		
ACT	Australian Capital Territory		
ALGA	Australian Local Government Association		
AS	Australian Standard		
DPTI	Department of Planning Transport and Infrastructure		
DTMR	Department of Transport and Main Roads		
GCM	Gross Combination Mass		
GCW	Gross Combination Weight		
HVNL	Heavy Vehicle National Law		
IAP	Intelligent Access Program		
LGAQ	Local Government Association of Queensland		
MDL	Mass, Dimension and Loading		
NHVR	National Heavy Vehicle Regulator		
NSW	New South Wales		
NT	Northern Territory		
NTC	National Transport Commission		
OSOM	Oversize Over mass		
PBPL	Port of Brisbane		
PBS	Performance-Based Standard		
PP	Period Permits		
QLD	Queensland		
RAVRAT	Restricted Access Vehicle Route Assessment Tool		
RMS	Roads and Maritime Services		
SA	South Australia		
SPV	Special Purpose Vehicle		
STP	Single Trip Permits		
TAS	Tasmania		
VIC	Victoria		
VLM	Vehicle Limits Manual		
WA	Western Australia		

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BACKGROUND

In May 2018, the Transport and Infrastructure Council directed the National Transport Commission (NTC) to review the Heavy Vehicle National Law (HVNL). This is one of eight issues papers that seek industry feedback concerning opportunities to improve the law.

This submission by the IADC focuses on Over Size Over Mass (OSOM) Class 1 access within the Oil and Gas Industry specifically gas drilling and well servicing.

The IADC submission is focused on National Transport Commission (NTC):- 4.4 Clear Responsibility and Accountability – for the transport operator, below is the extract from

To situate the submission the core statements from the NTC Easy Access to Suitable Routes Issues Paper, June 2019, 4. Aspirations - paragraph 4.4

Draft regulatory principle 4: Access decision-makers, beneficiaries, facilitators and enforcement should have clear responsibilities and accountabilities. Those who are responsible for access decisions, and those who make use of them, should be accountable. It should be possible to appeal and review decisions.

4.4.1 For the regulator The new law may permit the regulator to make access decisions on a risk-management basis, rather than being forced to follow a prescribed process. The regulator then has capacity and accountability to operate within the limits of states and territories' agreed bounds and its own risk appetite in making access decisions. On-road enforcement should be easily achieved. It shouldn't depend on operators carrying documentation.

4.4.2 For road managers Road managers should retain accountability for the roads they manage. Their role means they necessarily play a key role in access decision-making. They should also be accountable for their performance in making decisions about consent. The new HVNL should give road managers options to delegate consent decisions in a way that manages resources, expertise and risk. Depending on the circumstances, road managers might choose to delegate consent decisions to a party such as: • the NHVR • the relevant jurisdictional road authority • private assessors • other local governments (by collective agreement or by an outsourced service) • other qualified parties. Access conditions imposed should be pre-defined,

INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

predictable and consistent. This would include any requirements to use pilots and escorts. Mutual recognition will help in this regard.

A single journey should be able to rely on the same pilot and escort combination from start to finish, regardless of any border crossings.

4.4.3 For transport operators Under the new HVNL, transport operators must continue to be responsible for: • complying with access conditions • managing the risks of their operations so they operate safely. In certain cases, there may be increased or expanded accountabilities for transport operators to demonstrate their compliance and risk management. This could be done through accreditation, technology or other means. These increased accountabilities would be matched by expanded access.

NTC Question:13: How do we best share the risk management responsibilities between parties with a role in heavy vehicle access?

NTC Question 14: How do we manage the accountability of parties with a role in heavy vehicle access? "

CONTEXT OF THE REVIEW

The Australian Government announced an independent review into why some transport operators, specifically undertaking Oversize Over mass (OSOM) movements, are experiencing economic impacts and delays in being granted OSOM road access permits.

An oversize/over mass vehicle is a heavy vehicle or combination which alone, or together with its load, exceeds prescribed mass or dimension requirements, and is a class 1 heavy vehicle carrying, or designed for carrying, a large indivisible item.

This does not include road trains or B-doubles, or vehicles carrying a freight container designed for multi-modal transport. Examples of OSOM vehicles include a combination of prime movers, low loaders, low loader dollies, boosters, platform trailers and Drill Rig Carriers.

This paper was initiated by the IADC, following concerns raised by industry regarding significant waiting times for restricted-access heavy vehicles to access the road network. The focus of this review is restricted-access heavy vehicles undertaking OSOM movements, these movements require special authority to travel on the network due to safety of other road users and to protect infrastructure. The review focuses on the permit approval timing being experienced by transport operators to gain access to the road network.

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The aim of the paper is to identify the factors that are preventing timely assessment of access permits, propose short and medium-term actions and improvements to remove or decrease the process barrier impacts, thus allowing the issue of OSOM permits within a reasonable timeframe without compromising safety.

SCOPE OF PAPER

The Paper has considered the current process including a focus on permit approval times, current practices and principles and incorporate stakeholder consultation to provide further insight. The paper comprises the following:

- Current access arrangements for OSOM vehicles and permit approval times, including Heavy Vehicle National Law (HVNL) designated roles, processes and responsibilities
- Current practices and principles used by Road Managers to understand the key considerations that underpin the assessment of risk and risk-mitigation decisions
- The factors that contribute to approval times from application to issuing access permits, including route and asset assessments, the IT systems and tools used, and third-party consultation
- The impact on industry and Road Managers from existing OSOM access arrangements
- Attributes or components of equivalent best practice arrangements
- Variations in OSOM access arrangements and permit approval processes between states, territories and local governments, and communication processes for changes to operational policies
- Priority matters to be considered by the National Transport Commission Review of the HVNL
- Strategies to reduce the number of access permits issued or to reduce the time taken to issue permits, and their effectiveness in improving OSOM access arrangements.

Without compromising safety, the paper will consider recommendations which are more quickly implementable on:

- The greater use of technology and data in improving OSOM access arrangements,
- Improved reporting arrangements for industry, Road Managers, and governments including regular timely reporting and more accessible statistics
- More streamlined and visible permit approval processes
- Better identification and strategies to support the uptake of best practice

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- Improving OSOM access outcomes through better industry planning and engagement
- Improving arrangements for sector-specific vehicles, such as agriculture
- Improving permit approval timeframes
- Harmonised police and/or pilot arrangements between jurisdictions.

APPROACH

IADC undertook the following approach for this submission:

- Discovery –Process review to assess and where possible quantify the productivity, asset management and safety impact of existing access arrangements for OSOM vehicles.
- Engagement Undertook significant engagement with industry, the National Heavy Vehicle Regulator and Road Managers.

The objective of this paper has been to assess and where possible quantify the productivity, asset management and safety impact of the existing OSOM access arrangements on a national level and identify improvements to better manage OSOM activities.

EXPERT REFERENCE GROUP

The Review was guided by an industry Expert Reference Group (ERG) comprising:

- Chairman IADC Rig Move Committee CEO CTG Australia
- Secretary IADC Rig Move Committee
- CEO Transport Compliance Safety Training, Australia
- General Manager, EasternWell Group
- Vice President, Ensign Energy Australia.
- General Manager Savanna Energy Services Australia

The purpose of the ERG was to:

- Liaise with IADC on the Review
- Provide advice to IADC on stakeholder engagement in regard to the Review
- Provide guidance to IADC on the Paper in general
- Review the draft Paper and provide feedback to IADC and comments where required.

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ENGAGEMENT

This review included significant stakeholder engagement over an extended period including the following:

- NHVR The national regulator responsible for granting permits for OSOM movements.
- State Road Managers State transport agencies responsible for the state road networks and granting access.
- Local Government Associations Associations that represent the Local Government Road Managers responsible for the local road networks and granting access.
- Transport Peak bodies Associations that represent transport operators.
- Transport operators from the heavy haulage, construction and crane sectors.

The format of the engagements was targeted small group face to face meetings as well as phone interviews. This gave an opportunity for individuals to provide their views discretely. It also provided a more targeted approach to delve in more detail on specific issues.

RELATED WORK

This Paper acknowledges the significant bodies of work that have already been undertaken that deal with Heavy Vehicles in Australia. This includes inclusion of relevant work and their recommendations that are applicable in forming possible solutions to assist the issue. The key publications considered were:

INQUIRY INTO NATIONAL FREIGHT AND SUPPLY CHAIN PRIORITIES

On 18 May 2018, the Hon Michael McCormack MP, Deputy Prime Minister and Minister for Infrastructure and Transport, released the report of the Inquiry into National Freight and Supply Chain Priorities. The Inquiry was conducted by a four-member expert panel to inform the development of a National Freight and Supply Chain Strategy through the COAG Transport and Infrastructure Council.

The key critical action area that directly relates to this Review is the integrated approach, however some other key critical action areas are also referenced.

A nation-wide, consistent and integrated approach to freight and supply chain issues is needed to enhance the efficiency of the movement of freight. Other than where completely vertically integrated supply chains exist, freight modes and operators need to work together for the whole network to be efficient.

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A national approach to freight that encompasses planning, infrastructure investment and regulation is important to maximise benefits to Australia and enhance international competitiveness.

Future challenges and opportunities which require a national approach include: harmonisation, streamlined regulation and cross-border planning among Commonwealth, state, territory and local governments.

ISSUES

Key excerpts of what industry has said include the following:

Delays granting permits for OSOM vehicle movements are proving particularly costly for many parts of the industry. The flow-on effects are felt throughout the entire economy, most acutely in the mining resources, agricultural and construction sectors...

The heavy vehicle permit approval system for road access within the states is a barrier to productivity and investment, particularly for oversize/over mass operators

It can take more than 30 days to get a permit to transport OSOM Drilling rigs on the Local council roadways, because the Local Government operator and NHVR processes do not work in parallel.

The Drilling Industry are frustrated in their attempts to work within an outdated system which is prohibiting best practice demand management within already constrained supply chain's and forcing unnecessary delays and exorbitant costs back onto the industry at all levels.

it is not uncommon to change drilling locations at a moment's notice based upon industry constraints forcing transport companies to apply for multiple permits on a just in case basis, adding further congestion and complexity to an already overworked, and stretched system

New permit required for each move of the same load, same configuration and same routes

The current OSOM system falls well short in meeting a modern, efficient, dynamic distribution system within critical supply chains delivering significant GDP to Australian economy consequently carriers are forced to apply for a new permit, on a case by case basis, even though they're seeking approval for the same type of load, for the same vehicle and for the same destination, using the same road network



DISCUSSION

IMPROVING THE SYSTEM

With the ever-present focus in reducing the coal carbon footprint across the globe, the Queensland Natural Gas Industry continues to grow in exploration to facilitate the growing need for cleaner energy, for Australian Domestic and International Export through the Port of Gladstone Queensland.

As a result, the Australian Oil and Gas Industry is projected to be 1.8 times its 2019 level by 2030 which represents a significant annual growth rate for commercial and residential end users.

As part of this growth there will be an increase in demand for gas well drilling and well servicing. The majority of road movement associated with gas wells consist of OSOM freight which encompasses drilling rigs and associated equipment with movement predominantly within proponents internal lease sites every 3 to 5 days, these do not require OSOM permits as it is managed through a SIMOPS Process or (Simultaneous Process of Operations) encompassing route assessments, landscape, weather, other construction, and vehicle movements, time frames, movement duration, these are consolidated and approved internally.

As the gas fields continue to expand for new gas wells, along with maintaining existing wells, the movement of drilling rigs, will naturally increase and will be carried out on public roads as well as private including federal, state, local government road assets across all States and Territories.

The current process for OSOM freight approvals (Diagram 1) have strained the capacity of the National Heavy Vehicle Regulator (NHVR) and state and local road managers, with significant waiting periods encountered in the gaining of approvals by transport operators. <u>Current waiting periods make it</u> <u>impossible to move a drilling rig within the timeframes set by the driller's major customers.</u>

Gas well drilling and servicing agents are demand captured – they have to move rigs when directed by LNG companies.

During our stakeholder engagement process, a number of issues were raised where operators of some restricted-access heavy vehicles have been required to wait for several weeks for permits and escorts assessment and processing to allow them to access the road network.



The major themes that emerged from the issues raised in the consultations include (but are not limited to):

- Process application, assessment and response
- Communication between Road Managers for routes with multiple assessing managers
- Inconsistencies of rules across different jurisdictions and assessment paths
- Capacity for Road Managers to assess permits quantity and capability of road managers access, capability and training relating to process and assessment



Table 1 – Strategic Easement Approach _ Example

The above attachment demonstrates the complexity between federal, State and Local road access requirements supporting permit approval, this is further compounded by rerouting and changes in the drilling programs that dictate the location of the drilling activity on a day by day basis.

^{12 |} Page

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NEED FOR ACTION

A recurring theme from the review has been the need to improve the current arrangements.

This has ranged from claims the whole system is broken, to identifying areas of good practice that could usefully be applied more widely to improve those current arrangements.

While the system is not broken – as evidenced by the ongoing movement of OSOM loads across the country, the review has identified that there is considerable scope to improve systems that support the efficient assessment and operation of the OSOM transport task.

Various participants in the industry including state authorities, the mining sector and the transport industry have all demonstrated the capacity to respond quickly to deliver some of the desired efficiencies to improve OSOM movements, while mitigating their impacts on other road users and their safety.

Continuing to achieve these improvements as the number of movements expands significantly over time will require the continuing co-operation, focus and resource commitment of all participants, especially during the next two years as the processes are refined and improved. Failure to achieve the efficiencies could harm the National economy significantly.

OSOM load requirements are driven by the key mining and agriculture industries where investment and employment are dependent on economically feasible projects. Improved OSOM processes can help ensure the viability of these projects.

EXISTING ACCESS FRAMEWORK

The Heavy Vehicle National Law (HVNL) commenced on 10 February 2014 in the Australian Capital Territory, New South Wales, Queensland, South Australia, Tasmania and Victoria. Each of these regions either passed a law that adopted or duplicated the HVNL. Western Australia and the Northern Territory did not adopt the HVNL, however all heavy vehicles crossing into states and territories that have adopted the HVNL must comply.

Prior to the introduction of the HVNL and the NHVR, for OSOM Permits transport operators requested access directly with the relevant State/Territory, Local Government and private owner Road Managers, resulting in a lack of consistency in approvals, approval times, and approval conditions. The HVNL therefore sought to address these issues by providing a single national framework, with standard conditions or processes in place.

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The number of permits issued in the participating jurisdictions in Australia is approximately 46,000 through the formal process. Approximate volumes are:

- QLD 22,000
- NSW 9,000
- NHVR, which includes VIC, TAS and SA 15,000.

The following Principles need to be adopted, resulting in promotion of public safety, management of infrastructure, environment and public amenity, and promotion of industry productivity and efficiency.

These principles are as follows:

- Provide access to Federal roads on an annual basis
- Provide access to State roads on an annual basis
- Allow road users to work directly with local councils to access local council roads
- Ensure Routes are appropriate for vehicle
- Consider route and network-wide benefits
- Pro-active approach to managing access through technology enabling

The overall aim for Road Managers is to understand their assets, both road network as well as road infrastructure, and release the latent capacity of their assets to allow for increased access whilst responsibly managing the road transport infrastructure asset and public safety.

- The HVNL should not prohibit the use of restricted access vehicles but facilitate the use of such vehicles if
 - o public safety,
 - road infrastructure and
 - o public amenity is not adversely affected.

The broad philosophy underpinning these guidelines is to encouragement of innovation, productivity and efficiency in the road transport sector, whilst having the utmost regard to public safety and minimising the impact of restricted access vehicles on road infrastructure and public amenity.

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PERMIT PROCESS

The purpose of the permit process is twofold. The NHVR satisfies itself that a restricted access vehicle will not pose a significant risk to public safety, and the Road Managers assess whether the restricted access vehicle can operate safety in the environment of the roads for which it is responsible.





The permit process should include the following steps:

- Annual permits allowing operators to access the Federal Road network will significantly improve the efficiency of the process
- Annual permits allowing operators to access the State Road network will significantly improve the efficiency of the process
- Allowing operators to discuss directly with Local Councils re road access will also improve efficiency and streamline the process:

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The following Gazette examples demonstrate the Federal and State government initiative and willingness to work with industry to resolve issues causing unnecessary delays and constraints within the Heavy Vehicle National Law compliance

Gazette exemptions are not new, there are numerous examples of Government and Industry working together to facilitate a solution which allows OSOM known vehicles to operate on the road network without the need to continually apply for permits and approvals

Examples of Gazette exemptions below demonstrate both the State and Federal Governments intention to work with industry and streamline the process resulting in improved efficiency, reduced red tape and a concerted effort to improve the OSOM permit system

Exemption by notice in Gazette

Example 1

National Heavy Vehicle Standards (Special Purpose Vehicles Exceeding 40 tonnes Total Mass) Exemption Notice 2018

1. Purpose

This Notice exempts certain categories of Class 1 Special Purpose Vehicles (SPVs) with a total mass exceeding 40t from complying with certain specifications of the *Heavy Vehicle (Vehicle Standards) National Regulation* (the National VS Regulation).

Example 2

National Heavy Vehicle Concrete Agitator Work and Rest Hours Exemption Notice 2019

1 Purpose

The Authority may, by notice published in the Government Gazette, exempt vehicles or combinations from:

- (a) a mass or dimension requirement of the Mass and Loading Regulations, other than a requirement that relates to a GVM, GCM or manufacturer's limit; or
- (b) a dimension limit in the Vehicle Standards Regulations.

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A comparison of operation features between standard load carrying vehicles, agricultural machinery and gas rigs is shown below.

Gas drill rigs have more in-common with agricultural machinery as per the comparison of features above than with standard OSOM load carrying vehicles.

Agricultural vehicles have greater tolerances for oversize movement under a notice not a permit. Gas rigs movement can also be suitably regulated under a NHVR Notice instead of a permit.

Load Carrying Vehicle OSOM Class 1	Agricultural Machinery OSOM Class 1	Gas Drill Rig
One vehicle and trailer	One vehicle and implement	Multiple vehicles and trailers
Load Carrying	Non-Load Carrying	Non-Load Carrying
Dimension and mass vary with each journey	Fixed dimension and mass	Fixed dimension and mass
Primary work location – on a road	Primary work location – off road	Primary work location – off road
Driver is the primary operator of the vehicle	Driver may be the primary operator of the machinery	Driver is not the primary operator of the machinery
May require pilot and escort	May require pilot	May require pilot
High exposure to road traffic	Low exposure to road traffic	Low exposure to traffic
Multiple loading patterns and variable restraint methods	Fixed restraint	Fixed restraint
Operates under permit	Operates under a guideline/notice	Operates under a permit



What the Drilling industry needs is a process which will allow movement on the road network for registered OSOM vehicles within nominated guidelines.

- Gazette registered operators compliant to the NHVR guidelines, allowing the use of Federal, State and Local council road network based upon demonstrated compliance with axle weights and dimensions
- Annual permits allowing operators to access the Federal Road network will significantly improve the efficiency of the process
- Annual permits allowing operators to access the State Road network will significantly improve the efficiency of the process based upon nominated routes
- Allowing operators to discuss directly with Local Councils re road access will also improve efficiency and streamline the process:

CAPABILITY AND RESOURCING

LOCAL GOVERNMENT

Local governments own and manage approximately 75 per cent of Australia's road network by length. Local government Road Managers consider potential impact on infrastructure, safety and a need to balance a wide range of responsibilities to the community, including access to homes, safety and amenity of its citizens and businesses.

Prior to the HVNL being introduced Local Government were seldom consulted for consent for OSOM movements by transport operators.

Previously transport operators would request consent through the State Road Manager. The State Road Manager's permit included consent for their network with a condition to consult the Local Government for access to their network however this did not happen.

At present, most Local Government Road Managers receive requests for consent from the NHVR through the NHVR Portal.

In QLD DTMR request consent and coordinate this, in NSW transport operators request consent directly, in other jurisdictions State Road Managers assist and help educate Local Government Road Managers on access.

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The key issues identified as part of this review:

- Capacity: Local Governments do not have the resources to assess Class 1 Permits issued by NHVR, this responsibility to their Road Manager or Engineering Team who are also responsible for all other civil engineering projects including road maintenance, water systems, bridges and buildings.
- Capability: For Local Government to provide consent they need to make a decision on the capacity of their road network and key assets including bridges. These decisions need to take into consideration the asset condition, there may be little to no data on the asset condition and formal assessments may be required. Most Local Governments may not the capability or funding to undertake a detailed bridge assessment, in addition to not having a whole understanding of their assets.
- Knowledge: Some Local Governments do not have an established asset management system that contains information on their road network and key assets including bridges. This also includes no ability to assess OSOM movements in a clear, transparent and repeatable way.
- Funding: With limited available funds for Local Governments, with no incentives to increase access for OSOM vehicles, there is a focus on reconstruction and maintaining of their road network. OSOM movements may have an impact on road condition with no ability for Local Government to receive funding. There is little or no incentive to be cooperative to approve an OSOM movement that ultimately will be disruptive to their constituents.

Based upon the above principle it is essential that the operators of Drilling equipment liaise directly with Local Councils

Omitting this step for a move which adds to delays, extra costs and most of all frustration all round. The paper identified a number of blanket approvals or known access arrangements for first and last mile that the transport Industry had access to, these need to be placed on the network and formalised.

With the identification of the above issues there have already been significant bodies of work to create and formalise solutions, an example of this is the Australian Local Government Association's submission for the 2018-19 Federal Budget outlining that further investment is required for Local Government to not only maintain but to improve their network as to increase the productivity of key freight routes. Some of the recommendations include:

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- Creating a Local Freight Productivity Investment Plan, funded at \$200 million per annum for five years, to ensure that first mile/last mile and freight connectivity issues are addressed.
- Improving the safety and management of local bridges by making the Bridges Renewal Program permanent.
- To fund councils to undertake regional transport plans, including permit processing and demand forecasting on key freight routes.

There are many examples of Local Government forming strategic partnerships to develop regional transport strategies that identify key freight networks in consultation with State Road Managers and industry. These strategies take the approach that Local Government supports freight but require increased investment to ensure their network can be sustainable while increasing access. An example of this outlined in the First and Last Mile Pilot Project Case Study.

With Local Governments working together, there is an ability to address issues as a network rather than individual roads, by taking a network approach there is the ability to better define pinch points and focus funding to address them. This approach will enable more efficient and effective network development by addressing issues such as connectivity, consistency and equity. This approach also lends itself to undertaking assessments then enabling common routes to come under a notice or pre-approval.

Austroads have published a Research Report (AP-R559-18) Local Road Access for Higher Productivity Freight Vehicles that even though not specifically focussed on OSOM movements has transferrable and applicable recommendations that should also be considered as part of the Review. These include:

- Facilitate better knowledge and understanding of the Performance-Based Standards (PBS) Scheme by Road Managers - Develop and deliver nationally co-ordinated education campaigns and supporting tools targeting local Road Managers and regional state Road Managers.
- Outsource road asset audit & assessment Provide a mechanism by which local councils can apply for funding to outsource bridge asset auditing and geometric or structural route assessments to third-party professionals.
- Funding for structural upgrades/replacements Targeted funding to upgrade or replace critical structures so that high-productivity freight vehicles such as 50.5-tonne PBS quad axle semitrailers and 85.5-tonne PBS A-doubles— can access priority freight routes.

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- Improve the governance of, and confidence in, in-principle access decision-making Consider legislative amendments to introduce binding decisions within a statutory timeframe when requests are made for access prior to a PBS Vehicle Approval being issued.
- Incentivise on-time access approval Amend the legislation or provide other forms of support to better enable access approval within an acceptable timeframe.
- Strengthen Section 156(3) of the HVNL.
- Implement independent appeals process Identify options for, and implement, an independent appeals process to handle appeals against adverse access decisions, to improve confidence in the delivery of due process.
- Implement better journey planning Improve the NHVR Journey Planner so that (a) automatically-generated routes between origins, waypoints and destinations take into account the vehicle classification, the various road classifications, and other considerations that can easily be built into the tool, and (b) it reflects in a timelier manner the updates that are frequently made to online maps managed by the state road authorities.
- Implement cost recovery options Develop a suite of practice-ready cost recovery options to compensate for additional infrastructure consumption or to fund infrastructure upgrades.
- Update route assessment tools Update the PBS Network Classification Guidelines to reflect the more advanced route assessment guidelines used by state road authorities and to include additional considerations specific to local councils.
- Update the Restricted Access Vehicle Route Assessment Tool (RAVRAT) to reflect the changes.

Table 3 Regulatory Burdon



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RECOMMENDATIONS

- Access to the Federal Road Network
- Access to the State Road network
- The ability to liaise directly with local council regarding access to the Local Road Network
- The greater use of technology and data in improving OSOM access arrangements
- Improved reporting arrangements for industry, Road Managers, and governments including regular timely reporting and more accessible statistics –
- More streamlined and visible permit approval processes -
- Better identification and strategies to support the uptake of best practice
- Improving OSOM access outcomes through better industry planning and engagement
- Improving arrangements for sector-specific vehicles, such as Oil and Gas Drilling companies
 Improving permit approval timeframes
- Harmonised police and/or pilot arrangements between jurisdictions.

The IADC and its associated members therefore request a review with the NTC to discuss the process and possibility to improve access to the road network and reduce the complexity of the OSOM permit system as a step towards streamlining and improving the existing framework.