GTSN

National Transport Commission
Via email: hvnlreview@ntc.gov.au

20 November 2020
Submission to HVNL Review - Consultation Regulation Impact Statement (CRIS)

The Grain Transport Safety Network (GTSN) consists of grain supply chain parties involved in moving grain from paddock to silo and from silo to end user/export terminal with a focus on zero harm across the supply chain.

GTSN members are aware of recent HVNL enforcement action in Queensland relating to axle group mass limits on grain trucks and a proposed Improvement Notice issued to GrainCorp. The Improvement Notice requires the underloading of grain trucks to reduce the risk of exceeding axle group mass limits. Based on GrainCorp' estimates, a 10% under-loading would be required to minimise the risk of breaching these limits.

Technology and expertise to manage grain truck axle group masses is currently controlled by grain truck operators. In contrast, axle group measuring technology is extremely rare for loaders and unloaders of grain trucks, whose infrastructure is predominantly designed to measure total gross vehicle and/or combination truck mass.

Under the scenario of an industry-wide application of a 10% underloading, the implications for the grain industry would have significant safety and environmental implications due to the increase in grain truck movements.

Based on GrainCorp's assumptions, a 10% underloading extrapolated across the eastern Australian grain industry, applied retrospectively from 2011 to 2020, would have had the following impact:

- An additional 770,000 truck movements (77,000 p.a.) to transport the same volume of grain; with associated safety risks, road wear, congestion etc.
- An additional 65 million tonnes of carbon emissions (6.5m tonnes p.a.) due to the increase in truck movements.

Through the HVNL Review, the GTSN request that axle group measurement requirements do not apply to loaders and unloaders of grain trucks because of the following;

- Strict adherence to gross combination mass limits on arrival/exit from storage sites ensures substantial compliance;
- The costs and time required to ensure full and accurate compliance (if even possible) are disproportionate; and
- Truck drivers and operators themselves are best placed to ensure compliance with axle weights.

Yours Sincerely,

Derek Robjohns
GTSN Chair

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