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Enquiry Description:

Hi I would like to add my views to the Grain Harvest Management Scheme Review please. I'm not great at this so I have just tried to answer the question set out in the issues paper (22 aug 2019) as best I can.

We operate Primarily in South Australia (Viterra and Various others such as Aust Milling Group, Aust Grain Exports and some other storers/processes/packers) and also a bit with Victoria (Graincorp)

Existing State based HMS.

South Australia

Barriers-

There seem to be no real barriers to either states, generally it doesn't matter if you're in a mass scheme or not. GCorps system seems to penalise those with Mass Management as you have no allowance over your max weight at all (not even 20kgs), but anyone in a banged up old farm truck on GML can get a 5% overload allowance. Seems like the good operators who operate under schemes and have their vehicles more up to spec are the ones penalised in VIC.

There are no real barriers to moving between states, you know where you're taking the load so you try to load accordingly.

Compliance-

I think both SA and VIC schemes do force operators to be more compliant as the major receival points tend to frown upon (SA) or outright turn away overloaded vehicles (VIC)

The SA scheme is excellent. Truly I think it is pretty much perfect in an imperfect world. Drivers are given notice at the receival point of an overload and they have 2 more goes to rectify it. Sure, it is a self-regulating scheme, but for those who use it properly it is fantastic. Viterra for example have a sin bin system that any vehicle that comes in

over 5% they must sit to the side for "X" amount of time, before they unload. When you have a header driver screaming where are you that is good incentive to not be sitting on the side of a marshalling yard.

Some schemes have a 3 strikes and your truck is banned from receipt for the season. This is the stupidest rule, I mean if you get an incompetent driver that stuffs up 3 times it doesn't matter if you replace the driver, too bad, you can't use that truck again. Sometimes you don't need an idiot driver, Pretty much all my drivers including myself have gone in heavy on three consecutive occasions whilst physically putting less grain in and seeing the scales read less than the previous load. It's a very very inaccurate science. At these places you find yourself going in 2-4 tonne light just so you don't get banned and that means mass management is a waste of time. Frustrating when you know yourself you're trying to do the right thing.

Benefits -

I find the SA Harvest scheme, absolutely first class. It is easy to understand, easy to implement, it allows for mistakes and the difficulty of the loading conditions.

All my drivers still fill out their mass management sheets as it is, overload or not. That way, they don't feel pressured to fabricate figures and I can see how they are loading when I do quarterly reports. We, like everyone, try to maximise our loads and scales definitely help getting close, but occasionally we go heavy and knowing that we aren't going to lose a weeks wages or points for a simple mistake really makes the high pressure job of harvest a little bit easier.

We operate under 50 / 68 / 68.5 and for this season 91 tonne limits. Truck and Quad dog, B- Double and 30 m Road train. I don't see the need for increased limits for harvest if we continue to operate under the SA scheme. If there was say a 3 tonne "harvest tolerance" with NO overloading at all, then we would just load less to be on the safe side and still be running around the max allowable on the current SA scheme.

Designing a National Harvest Mass Management Scheme

Purpose -

I think the scheme would be better if it was a condition of the scheme that vehicles had scales. How we (personally) operate under the SA scheme is we use a combination of the scales and also 'eyeballing' the load to judge the weight. Eg if we load on a hill and are a tonne heavy, the next load we load the vehicle a tonne lighter and make sure the total amount in the

tipper 'looks' less. (I mean 15 years ago we only went on eyeballing the load and were always within cooee)

I also think that it could be extended to GML and CML vehicles as long as they have scales. Having said that it would probably go down better to only allow vehicles on Maintenance/Mass schemes the 'privilege' of the scheme as these vehicles are seen to be kept 'more' roadworthy than other. Kind of a carrot incentive to join the other schemes.

Structure -

I think if there was to be a national notice then state based GHMS could be run separately under that heading. It's a big country one size won't fit all.

Although it's obvious I'm a big fan of the SA scheme, I could see that being adopted nationally as it could work on different axle weights, gross weights , GML CML and HML, even in areas where different weights are allowed over borders. Eg if I was to deliver to a site in Vic where the network only allowed 62 tonne but I've come from a 68 tonne SA network, I could still try to load to 62 tonne with a 5% tolerance. (Scales work most accurately at max weight., in this case 68)

Administration -

In all honesty I don't think it should actually be administered at all. I mean it sounds like we would have to have separate paperwork to fill out for harvest loads.

Maybe if it's noted that the operator is in the scheme, provided they are in mass management , then come audit time it is flagged that the auditor checks the mass management paperwork to see if heavy loads are rectified in the subsequent following loads (as per SA GHMS) that would stop duplicate paperwork or separate paperwork etc. Drivers hate paperwork as it is, so by giving them more they won't do it properly, so it won't be accurate. KEEP IT SIMPLE!

Maybe if a company isn't in mass management and aren't recording their loads then yes maybe they can enter a separate scheme. Or just force them to join Mass management.

Scheme Admin should have no powers maybe other than to say you can't be in the scheme.

Scheme Admin should just be there to coordinate individual states

requirements into a gazette for that jurisdiction.

Grain receivers should really be modelled on the Viterra model of letting you know your mass has breached the limit and to try and get it back to legal limits. It should be made clear that they aren't responsible for policing the system.

Although like Viterra, a major breach (in excess of 5%) the truck is grounded for a time period until it can be escorted to a suitable grid for unloading. It's a good "stick" approach, without being too draconian.

Registration -

I think option 2 would cover all you need. In reality why bother a farmer (producer) to register into a scheme which doesn't in reality affect him. He is already covered by CoR regs, so as long as he has indicated to the transporter that they want their commodity transported legally he doesn't need to be involved.

In reality, most farmers are stuck in headers not loading trucks, it's not their job to load a truck (that they don't own or operate) so how would they know how to do it properly anyway.

Maybe grain receivers could be participants, as in they advertise (or just let it be known) that they allow acceptance to the, say SA model GHMS and that they will ground trucks for a period of time, not a 3 strikes you're banned system. That might sway producers (especially ones with their own trucks) to go there instead of a 3 strikes site. It might be beneficial for their business. (have you noticed I really hate the 3 strikes/ you're banned system, I mean we all stuff up, even us so called professionals.)

For ease for most people the registration process should be

* In mass management, apply, be granted fill in existing mass loading sheets. Auditor checks at audit time.

* Others, say farmers out of a scheme, maybe join a scheme, or model Mass management load sheets etc and submit at end of season??

Participants could be excluded if they continually breach the rules. For example over a number of years our trucks probably are loaded correctly (eg under legal limits) between 80 - 90% of the time, and maybe for the whole harvest, so 5 trucks, 500-600 loads maybe 1 or 2 individual loads over 5% breaches and in my quarterly reporting I've always found drivers get back to legal weights the next load or within 2 loads. This may also be because I tell my drivers that if you're within a tonne of legal just go. Eg if your

scales read 67 tonne and your legal at 68 that is fine, give yourself leeway. (And we still get overloads NOT trying to squeeze as much as we can on. That kinda shows how hard harvest loading can be.)

Probably the only mandatory obligation is record keeping, and auditing. Same as Mass management.

Commodities -

A commodity should be anything that is a primary agricultural product that is 'grown' for sale on a rural property. "grown" would exclude things like mined products eg coal, iron ore, sand etc, but include things like wool, grains, hay. Although in reality I think you could nearly just say "grains" as this is a Harvest Scheme, but it could come under a Commodity scheme, because I'm sure loading things like sand coal etc have the same issues.

Vehicle types -

I think any configuration should be included. I mean you're already bound by axles weights and gross weights so if an operator has a MAD combination for instance, why should they be penalised. Good for the goose, good for the gander in this case I think.

Mass allowances -

I think you're missing the boat here by allowing only an allowance on GML loads. Essentially what you're implying is that any old person can line up any truck and trailer they have, that only comes out of the shed once a year at harvest with no brakes or lights and goes and loads grain, your saying "here, have an allowance, load heavy, it's hard we know but we'll go easy on you." BUT to the operators out there that run on Mass and Maintenance schemes, who do their best to keep their vehicles roadworthy, drive un-fatigued and generally are as professional as they can be, you're saying "stuff you you've got scales you get nothing for all the money we demand you spend to be in these schemes. I feel in this case they should be in a scheme, in the end that one thing increase's safety of vehicles on the road.

I can only guess that the people writing these reports have NEVER loaded grain with scales. Scales are great, they make it easier to get closer to your gross weight without overloading, sure. BUT the problem is scales work perfectly on a weighbridge or a nice flat bit of concrete. If you're loading in a paddock (which let's be honest that's where all harvest loading is done) there are things like rocks, holes, press wheel marks even loading on the side of hill and if the axle with the height control valve on it is on a rock or in a hole then the scales read wrong, and sometimes it can be

out substantially, which is why we try to load by scale AND by eye.

It. Is. Hard.

What I really want to get across is that ANY FORM of a HMMS should incorporate not only GML loads, BUT ALL loads including HML. Again, the SA GHMS is an excellent example of what should be implemented. It has condition for mistakes, it has opportunity to rectify mistakes and for those on mass management it actually has built in accountability via the Audit process and the load sheets.

Everything you propose in this section is useless to every good operator out there. You really have to understand that even though we have scales, in a paddock loading situation they are not the silver bullet of accuracy.

IT MUST INCLUDE HIGHER MASS LIMITS OR IT IS A WASTE OF TIME.

Having said all that.. if AND ONLY IF it includes HML's then I would suggest a maximum of 5%. In our experience, if any of our loads at HML are overweight they are only usually 0.1 - 2% not the full 5%. The vast majority of them would be less than 1%.

Compliance and Reporting -

As this section generally deals with the compliance of a GML HMMS, most of the ideas are terrible. I don't think receivers should be forced to report to an authority, that's not their job, they aren't experts in the million and one different combinations of trucks and their weights. Anyway if it's used by mass management accredited operators its already reported by the load sheet documents and checked by the existing audit system

This is also the 3 strikes and you're out system which I detest, because in reality anyone who thinks this is a good idea hasn't had to deal with carting grain during harvest.

As for donating grain to charity, how do you think a farmer will take it if told he has to forcibly donate his grain to charity, that's bullshit, that's essentially blackmail. And what happens then is the farmer issued a tax invoice to show he has donated grain to a charity, I'm sure trying to do all this extra paperwork during harvest won't take long. Or does the receiver just say they will donate it and it just goes into the Christmas fund???

Again, this is the idea of someone who has never operated in the high-pressure area of a grain receival system. (Sounds great in theory, a disaster to implement)

The best option as I've said before, is, instead of forfeiting excess loads to a charity, you unload the grain in the system as per normal, up to 5% extra, the receiver issues you with a mass management warning, so they are informing you that you are heavy and to rectify it next load. And like Viterra's Sin Bin system maybe over 5% you have the truck sit in a sin bin for a predetermined amount of time before they can unload. 5- 6% - 1 hour, 6-7% 2 hours or whatever.

You can't just forcibly take someone's livelihood off them and give it to charity.

Again, the HMMS in SA allows all this to happen already. Records are kept, you have opportunity to rectify, you have to show that you have implemented corrective actions (through loading less and then has accountability by being checked through Mass Managements audits)

Routes -

I think that there is no need for specific routes, you have commodity routes now and the HML network. There has been a great deal of work in the "last Mile" to see the roads leading to receivers upgraded to receive most large trucks. If it sticks to the HML network, I think that would suffice.

No there should be no 'nearest approved grain receiver' as no one knows where there grain will go until it comes off the paddock (usually) and as long as you use the existing HML or other existing networks you should be able to go wherever you want/need to.

Timing -

Yes I think it should be year round as there's always grain stored in on farm silos, field bins and silo bags in paddocks.

Other issues -

All I can really add is that if you do a scheme, it should model the South Australian scheme, as it is the most practical, most efficient, and importantly only is accessible to those who are already on mass and maintenance schemes. (eg the safest trucks, in theory)

The SA scheme works, and it works well with existing safety practices, CoR practises, HML road networks, and is accountable with existing audit procedures. It doesn't cost operators extra on top of what they already are

prepared to spend. Implementing a scheme nearly identical to that nation wide would cost the NHVL very little money also.

Harvest for us starts next week on South Australia's Yorke Peninsula. Feel free to send someone to come along for a ride to see the issues with loading trucks by scales as it's not that accurate, which is why it needs to be also on HML vehicles.

A Harvest scheme only on GML is a waste of time and money and will not achieve any efficiencies or and real benefits to the vast majority of transport or farming operators.

Thank you for your time.

Kind Regards,

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