



Grain Harvest Management Schemes Review,
National Heavy Vehicle Regulator,
P.O. Box 492,
Fortitude Valley, QLD, 4006

16th October 2019

Email: info@nhvr.gov.au

The Livestock & Rural Transporters Association of Victoria welcomes the opportunity to provide comment on the NHVR Grain Harvest Management Schemes Review.

The Livestock & Rural Transporters Association of Victoria Inc (LRTAV) - is the peak rural transport industry body in Victoria. The LRTAV is the only body specifically representing hundreds of hard-working road transport companies & drivers, based in the small communities of regional and rural Victoria, providing the 'first and last' link of the supply chain for the state's agricultural industries.

The State of Victoria has in excess of 6,500 grain farm businesses covering more than 3.5 million hectares of land. Wheat is Victoria's largest crop, followed by barley, canola, oats and lentils. Victoria's grain farms are predominantly located in western and northern Victoria, with the majority in the Mallee and Wimmera regions. Grain growing in Victoria is continuing to expand into the high rainfall zones of southern Victoria and to a lesser extent Gippsland, on land previously used exclusively for pasture production.

LRTAV would endorse the introduction of a National Harvest Mass Management Scheme (HMMS). The introduction of a National Scheme would eliminate cross border compliance issues often faced under the current state-based schemes. Ideally, each state would adopt the National scheme, allowing Higher Mass Limit (HML) conditions.

Introduced within Victoria in October 2017, the Victorian Grain Harvest Management Scheme (GHMS) has appeared only to benefit those transporters operating without accreditation - performing under General Mass Limit (GML) requirements and in many cases working with out-dated technology such as sprung suspension and no form of weight gauge. Incentives must be initiated for transporters to participate in Mass, and particularly

Maintenance Management. It is imperative for operators to be encouraged to embrace technology and operate well maintained equipment – particularly when considering the enhanced safety aspects attained. It would be beneficial for Grain Receival sites to be increasingly vigilant in verifying Mass permit documentation in the NHVR Active Vehicle Module (AVM) Search database – allowing identification of fraudulent operators.

Under HMMS, LRTAV would propose a three per cent tolerance to an operator’s current mass limit whether that be GML, CML or HML – increasing to five per cent for those operating under Maintenance Management Accreditation.

Examples as follows:

Heavy Vehicle Combination	3% tolerance	5% tolerance (only with Maintenance Management)
GML Semi with SAA	43.0t + 3% = 44.29t	43.0t + 5% = 45.15t
GML B-Double with SAA	63.0t + 3% = 64.89t	63.0t + 5% = 66.15t
HML Semi with SAA	46.0t + 3% = 47.38t	46.0t + 5% = 48.30t
HML B-Double with SAA	68.5t + 3% = 70.55t	68.5t + 5% = 71.92t

The above tolerances would apply to all grain consignments departing farms during harvest season, with the preference of the scheme being adopted year-round. The changing face of agriculture within the state of Victoria, brings with it changing demands placed on the rural transport sector - the movement of grain within Victoria is no longer limited to the short harvest period, with transportation between farm / receival centre and port conducted over many months of each year.

Participating Grain Receival sites need to be made accountable for the reporting - to relevant State authorities - of operators that are frequently recording excess weights, with penalties applied accordingly. The [South Australian Grain Carriers Code of Practice](#) , offers protection to transporters that may be convicted of minor breaches, following the loading of product in challenging circumstances - under the Reasonable Steps defence. Consideration might possibly be made to implement such allowances within the anticipated National Harvest Mass Management Scheme.

The Livestock and Rural Transport Association Victoria looks forward to further consultation on this important matter on behalf of our members. Should you require clarification on the above comments, please do not hesitate to contact Livestock & Rural Transporters Association of Victoria, Secretary, [REDACTED] – at your convenience.