

NSW Grain Harvest Management Scheme

Transport for NSW Response to NHVR Grain Harvest Management Schemes Review Issues Paper

(1) Background

The Grain Harvest Management Scheme (GHMS or Scheme) facilitates the safe and productive movement of grain from farms to grain receivers during the peak harvest season.

The Scheme was developed by Transport for NSW (TfNSW) in consultation with NSW grain industry stakeholders and relevant Local Government road managers, in response to industry needs for improved productivity and efficiency in the grain transport task. It is designed to decrease harvest risk, protect roads and to increase productivity and efficiency by facilitating the grain industry to move the average vehicle load towards 100% of the allowable mass. The Scheme commenced for the 2013-14 harvest.

The NSW GHMS includes the following elements:

- A mass allowance of up to five per cent over general mass limit for grain trucks moving from farms to participating grain receivers. Triaxle groups are allowed an additional 0.5 tonnes as a floating mass allowance, if the combined total mass does not exceed the general mass limit by more than five per cent. The Scheme operates under a Notice (see below)
- All participating vehicles must be accredited under the mass management module of the National Heavy Vehicle Accreditation Scheme, or equipped with type-approved on-board mass units – although transport operators were exempted for the 2013-14 harvest season.
- All Participating Grain Receivers (PGRs) are required to formally report receipt records to TfNSW on a regular basis.
- Participating transport operator vehicles are allowed three non-compliance occurrences (for loads exceeding the scheme limits by up to five per cent) during one season. After this, vehicles will be removed from the Scheme for the remainder of the season.
- Operators' vehicles will be immediately expelled from the Scheme for the remainder of the season if their truck load exceeds the scheme limits by five per cent or more.
- Excess grain is to be managed at receiver sites to avoid dumping in nearby areas.
- The Scheme became effective from 15 October 2013, through a Ministerial Order. The 2013-14 season operated until 31 May 2014 and, following a review, was extended from 1 October to 31 May in 2014-15 and 2015-16. The Scheme currently operates under the *New South Wales Class 3 Grain Harvest Management Scheme Mass Exemption Notice 2016 (No.1)* and is in effect until 30 June 2021.
- As at 13 November 2013, 45 councils were participants of the Scheme. Since that time and as at 14 October 2019, 47 councils participate in the Scheme.
- The Scheme operates under the *New South Wales Class 3 Grain Harvest Management Scheme Mass Exemption Notice 2016 (No. 1)*, under the Heavy Vehicle National Law.

(2) Review of the 2013/14 GHMS

TfNSW engaged CleanStar Australia (CSA) to review the performance of the 2013/14 GHMS against its objectives. CSA undertook analysis of harvest outcomes, key grain receiver records, and TfNSW records.

The clear view of the majority of those engaged by the review team was that the GHMS 'proof of concept' had been successful. The Scheme demonstrated modified industry practices and provided no noted increases in adverse impact on the State's pavements. Pending a number of improvements and clarifications, most stakeholders supported its continuation in the next grain harvest season. However, a small number of councils reserved their agreement to participate in a future Scheme until they saw the detailed implementation proposal.

The independent review concluded that the 2013/14 Grain Harvest Management Scheme was well received and should be continued (see Attachment 1).

Link:

https://www.transport.nsw.gov.au/sites/default/files/media/documents/2017/Review%20of%20the%202013-14%20NSW%20Grain%20Harvest%20Management%20Scheme_0.pdf

(3) Transport for NSW Freight Branch July 2018 –June 2019 Harvest Period Report

TfNSW has recently compiled a report on the NSW GHMS for the 2018/19 harvest period. Key findings in the report include:

- The strong level of overall compliance from industry continues to be evident in this latest report and is an important outcome for the Scheme. For example (notwithstanding the overall reduction in the grain freight task due to the drought), total number of breaches has declined to 3.3%. The majority of these breaches (93%) were in the up to 5% overmass range. This demonstrates that the scheme continues to achieve its objectives.
- In the reporting period, 75% of grain deliveries to participating grain receivers were made under the GHMS mass concession, which represents a 3.4% saving in the number of trips required if there was no GHMS.
- Over half of the deliveries for both GHMS and Non-GHMS deliveries to participating grain receivers utilised the allowable weight limit of 95-100% (57%) whereby 100% represents the Legal Weight Limit (i.e. for GHMS deliveries, 100% includes the additional up to 5% mass provided under the GHMS).
- For GHMS only deliveries, 44% of deliveries loaded to the 95-100% of the allowable mass limit. There is therefore an opportunity to increase productivity levels, with under half (39%) of deliveries (both GHMS and non-GHMS) falling within the 0-95% mass utilised bracket.
- It is noted in the report that stakeholders in the grain industry have Chain of Responsibility (CoR) obligations under the Heavy Vehicle National Law. The report identified that there is scope to engage with the grain industry to develop Codes of Practice to actively manage overmass breaches. At present, PGRs are being engaged to better understand current

practices of overmass management. Opportunities are also being examined for adoption of a consistent approach to the management of overmass deliveries to align with CoR requirements under the Heavy Vehicle National Law.

- In the FY18 GHMS report, it was identified that there is scope to improve the quality and consistency of data reporting received from PGRs. Changes have been made to TfNSW website to support PGRs reporting on the GHMS. TfNSW Freight Branch are continuing to work with PGRs to simplify data collection processes to ensure data accuracy and reporting efficiency.
- There has been steady growth in LGA and PGR participation, and TfNSW is currently engaging industry stakeholders including the GHMS Consultative Committee members to help identify and engage PGRs.
- Overall, the data and Scheme participation by councils and industry continue to show growing support for the GHMS. TfNSW will continue to administer the Scheme, progress previously identified opportunities for improvement, and work with the National Heavy Vehicle Regulator (NHVR) and TfNSW to implement any further changes. This report will also be provided to the GHMS Consultative Committee.
- TfNSW will also continue to monitor the data for compliance purposes to ensure the Scheme continues to provide productivity benefits to compliant operators, while ensuring road safety and road use is sustainably maintained.

(4) Other issues

Eligibility - Who and which vehicles should get access to the Scheme?

The current 2016/21 NSW GHMS allows the following vehicle types:

- a rigid truck with three or more axles
- a rigid truck (with three or more axles) towing a dog trailer with not more than four axles
- a prime mover and semitrailer combination that has an overall length not exceeding 19.0m, and not more than 6 axles in total
- a B-double that has an overall length not exceeding 19.0m, and not more than 7 axles in total
- a B-double that has an overall length not exceeding 26.0m, and 9 axles in total
- a road train that has an overall length not exceeding 36.5m, and not more than 12 axles in total
- a B-triple that has an overall length not exceeding 36.5 m and consists of a prime mover and three semitrailers, and not more than 12 axles in total; and

- an AB-triple that has an overall length not exceeding 36.5m and consists of a prime mover and semitrailer combination connected, by a converter dolly, to a B-double trailer set, and that has not more than 15 axles in total.
- All eligible vehicles must have dual tyres on all non-steer axles.

In 2018/19, most GHMS deliveries were made by Truck and/or trailer vehicles (69%), followed by B-Double (20%) vehicles and Road Train (11%) vehicles. In this reporting period, B-Double vehicles were underrepresented. Contrastingly, Truck and/or trailer vehicles are highly utilised.

The NSW Heavy Vehicle Access Policy Framework encourages the creation of Performance Based Standards (PBS) networks with connectivity across the whole NSW road network. The framework fosters the take-up of more modern and safer PBS vehicles which can carry more freight, putting downward pressure on the number of trucks in operation and leading to fewer trucks on the road than would otherwise be the case. TfNSW would therefore support consideration of the inclusion of PBS vehicles in the scheme, particularly PBS level 2 and level 3 vehicles

Policy settings - How should the Scheme work and should support be provided? Delivery - Who should operate the Scheme?

The NSW Scheme is administered by TfNSW, through a NSW Mass Exemption under the HVNL.

The 2013 review commented that “Stakeholders expressed the view that improved clarity on governance issues, such as purpose and administration, will result in more efficient operation of the Scheme and significantly improved communications and stakeholder management.”

The review identified the need to increase stakeholder awareness and communicate the benefits of the Scheme. A GHMS Consultative Committee was therefore established to improve the level of stakeholder engagement and involvement, while overall administration of the Scheme is undertaken by TfNSW.

A national scheme would benefit from consideration of the NSW experience. There is a need for a consistent governance, review, engagement and administration model for all harmonised schemes that recognise the legislative roles of the NHVR and road managers under the HVNL and engage customers.

Barriers to the adoption of the current Scheme in NSW

Not all vehicles used in the collection of grain at the peak of harvest were eligible for the Scheme, which has had an adverse impact on Scheme take up. However, the take up rate was good overall and this does not significantly impact on productivity improvements while helping to protect road condition.

Expansion of the Scheme to involve additional PGRs / local government areas may increase participation however it should be noted that some councils remain decline to participate due to concerns about pavement and other infrastructure impacts. It is suggested that the justification for schemes should focus on improved safety as well as productivity.

It should also be noted that not all grain receivers participate in the scheme at present. The focus so far has been to involve those most responsible for receiving the harvest. Smaller sites can be reluctant to participate as a result of their limited resources.

National HMMS – does NSW support:

(i) Rationalise existing state-based GHMS notices to create one HMMS national notice, while allowing separate state-based GHMS to exist in their current form, or

(ii) Harmonise existing state-based GHMS notices to create one HMMS national notice, and create one national HMMS, or

(iii) Develop a hybrid model to accommodate different state requirements.

TfNSW supports maintenance of the existing arrangements where the Scheme operates within a NSW Mass exemption notice under the HVNL. TfNSW does however support collaboration among states to explore opportunities to streamline, simplify and harmonise requirements of GHMSs to support participation and greater compliance. Opportunities to explore include harmonisation of truck codes and a consistent approach to the management of overmass deliveries by PGRs. A harmonised national HMMS notice may represent a longer term aspiration.

Administration - undertaken by a regulatory body or co-operatives?

In the 2013/14 independent review of the NSW GHMS, there was a recommendation that consideration be given to a commercial tender for the administration of the Scheme for the next two years. This recommendation was partially supported and led to the establishment of a stakeholder consultative committee with oversight of the Scheme, with day to day administration undertaken by TfNSW. There are currently no proposals to alter these current administrative arrangements in NSW.

Commodities

The Scheme is open to the following grains:

- Cereals (wheat, barley, rice, oats, triticale, sorghum, maize, or millets)
- Oilseeds (canola, sunflowers, monola, or safflower)
- Pulses (chickpeas, faba beans, lupins, mung beans, field peas, soybeans, vetch, or lentils).

There are currently no plans to extend the NSW GHMS to other crops or commodities within existing arrangements.

Mass Allowances – 5% allowance (as in NSW & VIC), 7.5% (as in QLD) or 10%

While there is some support for a higher capped allowance limit of 7.5% especially for cross-border consistency with Queensland, TfNSW believes that the optimum outcomes of efficiency, safety,

infrastructure impact and greater acceptance of the Scheme by local councils for access on local roads access would be best served by maintaining the mass allowance at 5%.

Increased mass above 5% would require more detailed investigation into the impact on safety performance and pavements, particularly on council managed roads.

Improved efficiency gains on top of the present arrangements would be best served by opening the Scheme up to relevant PBS vehicles access on appropriate road networks. Experience suggests that any increase in the allowance would not be accepted by many councils especially those reducing the volumes of grains that would be moved under the Scheme. As outlined there is excellent compliance with the allowable masses suggesting industry is well able to operate within these limits.

Routes, Local Councils, Participating Grain Receivers

The success of the NSW GHMS has largely come about due to the participation of local councils as the majority of grain harvest trips commence or finish on council owned and managed roads. There are currently 47 local councils participating in the scheme, with varying access conditions relating to nominated roads and bridges, seasonal time periods, time of day restrictions, weather, speed and truck types. See the link below which shows participating councils.

<https://www.rms.nsw.gov.au/business-industry/heavy-vehicles/schemes-programs/grain-transport.html#2016/21Participatingcouncils>

In addition to council involvement, the NSW Scheme also involves Participating Grain Receivers (PGRs). PGRs sign an undertaking to participate in the scheme, and agree to provide regular data on all vehicle deliveries including overloaded vehicles, and processes in operation for managing overloaded deliveries to ensure they meet CoR obligations. There are currently 25 PGRs in NSW, compared to 22 in 2016/17. See the link below which shows Participating Grain Receivers.

<https://www.rms.nsw.gov.au/business-industry/heavy-vehicles/schemes-programs/grain-transport.html#2016/21ParticipatingGrainReceivers>

Further Review

In the early development of a harmonised a scheme a review should be carried out across all schemes identifying objectives, outcomes achieved and potential improvements in alignment with National and State policy and opportunities to improvements in safety and productivity.