

30 September 2022



National Heavy Vehicle Regulator
PO Box 492
FORTITUDE VALLEY QLD 4006
Via email: info@nhvr.gov.au

REFERENCE: SUBMISSION TO THE REVIEW OF LIVESTOCK MASS, DIMENSION AND LOADING ARRANGEMENTS

The Livestock, Bulk and Rural Carriers Association (LBRCA) welcomes the opportunity to provide a submission to the National Heavy Vehicle Regulator's Review of Livestock Mass, Dimension and Loading Arrangements.

LBRCA is an NSW regionally focussed industry association that strives to improve productivity and safety for regional businesses and industries. Our membership comprises over 230 regional road freight operators, predominantly in the business of transporting livestock, bulk, and rural commodities. The LBRCA has continued to represent our industry since 1987.

Consultation Process

LBRCA consider that a nationally applied livestock loading scheme can provide certainty of application, improve animal welfare outcomes, increase efficiencies in cross-border transport, and reduce red-tape and administrative burden.

In forming this position, LBRCA consulted broadly with our membership at our 2022 Annual Conference held in May as well as through two online forums.

Additionally, LBRCA participated in external consultation with Transport for NSW and as a federation member of the Australian Livestock and Rural Transporters Association (ALRTA), we participated in consultation with our state counterparts that delivered majority agreement on most common elements comprising livestock loading schemes. We refer you to both the Transport for NSW and ALRTA submissions for these views.

Accordingly, LBRCA is pleased to provide our independent position on vehicle mass as well as additional feedback specific to access and training below.

Vehicle Mass

LBRCA agree that mass limits are applied for driver and other road-user safety. This includes consideration of the impact of freight vehicle use of roads and impact on road surface and maintenance.

Further, LBRCA understand that managing mass is a key component of the livestock transport task where often the driver is required to estimate the GCM because accurate livestock weights are not provided by the consignor.

The inclusion of axle mass limits to livestock loading supports local councils in access decisions, reduces the risk of livestock rollovers as livestock vehicles are known to have less stability due to the nature of the load, supports compliance assurance and minimises infrastructure impact.

For these reasons, LBRCA support the retention of axle mass limits in NSW, however with additional axle and gross tolerance to overcome occasions when an accurate mass of the load is not available, for example due to on-farm loading conditions.

Due to the difficulty of loading at sites where an accurate mass of the load cannot be obtained, LBRCA support a floating mass tolerance of 1.5t over the triaxle grouping of a semitrailer combination with Farm Gate access requirements (e.g., RIM telematics).

It is essential that there is early engagement with Local Council and Road Managers, along with State Road Authorities to ensure that there is no diminution of existing scope and access delivered under the existing State based Schemes.

Access

A great deal of work has been undertaken in NSW to improve heavy vehicle access networks. This is evidenced through the NSW Farm Gate Access Network that is providing real-time assurance to Road Managers about usage on their managed networks using RIM.

The NSW Farm Gate Access Network is a new heavy vehicle initiative that introduces conditional area-wide access for Higher Productivity Vehicles transporting grain and livestock on council roads in participating council areas. This network compliments the NSWLLS enabling seamless movement of grain and livestock across state and local roads.

For this reason, LBRCA recommend that the NSW Farm Gate Network framework be adopted as part of any national livestock loading scheme.

Additionally, LBRCA support the introduction of a Remote Access Scheme that affords additional mass for eligible vehicles operating in remote areas.

Training

In 2021 new driver education and assessment was delivered in collaboration with the LBRCA. The free online education is available to all parties in the Chain of Responsibility for livestock loading and is leading livestock loading education that supports industry to safely load and drive livestock vehicles known to have a higher risk of vehicle rollover.

LBRCA does not support the removal of livestock loading education from the LLS.

Other states have no training, and we recommend that NSW training be adopted as best-practice. It is accessible, based on current learnings, cost-effective, relevant, and we can provide assurance to road managers to retain and in some cases increase high productivity vehicle access on local networks.

LBRCA recommend training be modelled on the NSWLLS Driver Learning & Assessment framework that aligns to the national unit of competency AHCLSK320 – Coordinate and monitor livestock transport, however revised to include an Animal Handling and Working with Risks (e.g., power lines, electricity).

The NSWLLS Driver Learning & Assessment framework covers key elements including preparing for the transport of livestock, loading livestock, monitoring transport, and unloading livestock as well as competing transportation operations. It focuses on eliminating risks of a heavy vehicle rollover including correctly calculating mass and penning densities.

The current NSWLLS Driver Learning & Assessment provides for two assessment pathways. An Internal or an external pathway. Internal assessors are engaged to assess only employees engaged by the company they work for. These assessments form part of a company's safety management system and are conducted as part of the company's induction process. External assessors are engaged to assess livestock drivers who do not have access to an internal assessor.

LBRCA agree this learning and assessment framework should be retained – as part of any national livestock loading scheme.

LBRCA welcome the opportunity to provide our feedback to this discussion paper and we look forward to participating in further consultation.

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Yours sincerely,

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President