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29 September 2022

National Heavy Vehicle Regulator
Via email: info@nhvr.gov.au

LRTAQ RESPONSE TO REVIEW OF LIVESTOCK MASS, DIMENSION AND LOADING ARRANGEMENTS

Livestock and Rural Transporters Association of Queensland (LRTAQ)

By way of background the LRTAQ is the voice of the livestock and rural transport industry in Queensland, made up of approximately 100 member businesses from across the state.

We work with governments, regulators, industry groups and the media to ensure a safer industry that provides good conditions and a safe working environment for our drivers and other employees, demonstrating to the community the positive and essential role that rural and livestock transport companies play in the economy and quality of life for all Australians.

The LRTAQ is a member of the Australian Livestock and Rural Transporters Association.

Consideration of Livestock Mass, Dimension and Loading Arrangements Discussion Paper

The LRTAQ Management Committee has considered the NHVR's Livestock Mass, Dimension and Loading Arrangements Discussion Paper.

The LRTAQ has contributed to the ALRTA response and is supportive of their submission.

Additionally, the LRTAQ has also prepared this response.

Context

Queensland is a major producer of cattle with 44% of the Australian herd located in Queensland (10.7 million head) produced for both domestic and export markets. Queensland accounts for more than 58% of Australia's lot fed cattle.

The cattle industry represents 44% of the total value of Queensland agricultural production and is the biggest individual agricultural sector in Queensland. It is an important industry for the economy of rural and regional Queensland and employing tens of thousands.

Almost all cattle movements are provided by truck. However, transport of cattle is only one part of the livestock transport story with sheep, pigs, horses, goats and other animals adding significantly to these numbers.

Queensland is the largest pork producing state, making up 27% of Australia's pork industry. There are approximately 1.3 million pigs processed in Queensland annually which are all transported by road freight.

6. Defining Livestock

The LRTAQ supports the ALRTA submission on the definition of livestock.

7. Regulation of Conditions within A HVNL notice

The LRTAQ agrees that with the NHVR position that improved consistency would be provided by reducing the duplication of requirements that are already provided for under other state-based laws.

Scheme enrolment - people

It is the position of the LRTAQ that workplace health and safety laws, animal welfare laws, and the HVNL general safety duty adequately ensure drivers are appropriately trained and skilled.

In addition, the Queensland Government has recently approved the industry proposal requesting the establishment of a Heavy Vehicle Driver Apprenticeship. This pathway to a professional trade will be transformative for the industry and further raise levels of safety and skill.

The LRTAQ is of the view that any expansion of scheme enrolment for people must be fully considered in the context of the labour shortage crisis that currently confronts the road transport industry.

Scheme enrolment - vehicles

The LRTAQ suggests that a national Livestock Loading Scheme should require vehicles to undergo assessment upon entry to the scheme, such as the current S10 modification plate in Queensland. This will allow the relevant authority to quickly recognise the vehicle meets the correct standards.

8. Mass limits

The LRTAQ supports the NHVR's preferred option of volumetric mass limits.

The history of livestock transportation in Queensland is one of high competition, creativity and adaption.

The development and use of larger and more productive and safer road freight combinations is an area in which Queensland leads the world. Semi-trailer tare weights have reduced significantly from 22 tonne to 15 tonne conservatively since 1983.

In 1983 the Queensland Government introduced legislation to allow livestock trucks to load by volume rather than by weight. The intent was to increase the efficiency of livestock transport in the supply chain, reduce bruising and injury to cattle and improve safety for road users by creating more stable loads.

Volumetric loading provides positive animal welfare outcomes with animals less likely to be injured or stressed in trailers loaded by volume rather than weight.

In the decades that have followed, industry has significantly invested in equipment to comply with Queensland's Livestock Loading Scheme.

For example, the Queensland volumetric loading scheme works well for the transport of pigs as there are special animal welfare requirements that is needed to transport such fragile freight. Pig crates are equipped with water tanks and on-board watering systems, shade/covered in roofing to protect animals from the elements, effluent tanks and in some cases disinfecting systems.

These additional requirements are essential in transporting pigs in Queensland due to our varying climatic conditions and stringent biosecurity requirements.

Any reduction in the flexibility and efficiency offered by the scheme is likely to result in increased truck movements as smaller loads result in the need for more trips - placing increased pressure on an already stretched road network.

9. Eligible vehicles

The LRTAQ is supportive of the ALRTA submission with regards to eligibility of vehicles.

10. Road networks

As we are seeking the status quo be retained in Queensland we believe the existing road access be retained in Queensland. We would like to see a push to increase access in other states or at the minimum the introduction of freight corridors where access would be 'as of right'.

Conclusion

It is the position of the LRTAQ to strongly support the Queensland Livestock Loading Scheme and volumetric mass limits, a system which has supported the livestock industry in Queensland with efficient, safe and competitive transport.

The LRTAQ commends the NHVR for the work that has been undertaken to produce the Discussion Paper.

Yours sincerely

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President
Livestock and Rural Transporters Association of Queensland