



LRTAV Submission to the Review of Livestock, Mass, Dimension and Loading Arrangements

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1 Executive Summary

The Livestock Rural Transporters Association of Victoria Inc. (LRTAV) thank the NHVR for taking the initiative to review the different livestock loading schemes to move towards a simpler and truly national scheme.

The LRTAV strongly advocate the harmonisation of existing state-based livestock loading notices to create **one national Livestock Loading Scheme (LLS)** that is simple for the entire industry to participate.

Implementing a national LLS will allow Australia's agricultural supply chain to remain competitive by providing legal instruments that allow trucks to load to the mass limit in a way that will maintain animal welfare penning densities, maintain road infrastructure, drive safely, and encourage seamless cross-border movements.

Below are the key themes of the LRTAV recommendations:

1. Defining livestock – All livestock should be included in a national scheme.
2. Participation – the scheme should be extended to all parties in the chain of responsibility for the transport of livestock. These parties, including scheduler, owner, operators, drivers, loading manager and transporter, should be accredited (inclusive of training) to participate in the scheme.
3. Regulation – A centralised system should be implemented with a single scheme administrator (e.g., NHVR).
 - The scheme should contain audit requirements including record keeping. If an audit identifies continual breaches, including conformance with penning densities, loss of accreditation should occur.
 - Training must be a condition of accreditation.
 - If a vehicle is identified as being in breach of scheme requirements, including but not limited to penning density limits, all parties in the COR should be subject to enforcement and prosecution.
4. Vehicle requirements - All vehicles should be enrolled in the scheme and should be fitted with an S-10 certification plate (or similar) confirming TARE weight.
 - Vehicle combinations must be harmonised. Guidance material should be produced that describes each vehicle combination eligible to operate in the scheme.
 - Eligible vehicles should include all combinations upwards from tray trucks.
 - Vehicles should undergo an inspection upon entering the scheme and when ownership changes.
5. Animal welfare standards must be adhered to. Mass limits should conform to the *Australian Animal Welfare Standard – Land Transport of Livestock* that instruct mean live weight (kg), minimum floor area (m²/head) standing and number of head per 12.25 m x 2.4 m deck.
6. Mass requirements - Group axle weights should not apply. Animal welfare standards should underpin best practice for the transport of livestock.
 - TARE weights should be realistic and assessed based on a fully-laden vehicle (including fuel). TARE weights should be raised to an acceptable level and reflective of all modern-day requirements and equipment. See 6.4. for further information.
7. The use of super single tyres on the middle axle of trailers or converter dollies should be allowed for the purpose of maximising tread on steer tyres.



8. A national scheme should support local farm-gate access as well as remote access to accommodate all realistic operating conditions.

We note that it is also important to produce national conformity on Tier 1 Bridge Assessments and a national view on all vehicle combinations.

On behalf of the LRTAV committee and membership, thank you for the opportunity to provide our submission to this paper. [REDACTED]

Yours sincerely,

[REDACTED]

LRTAV President



2 Introduction

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

All members are catered for in our membership packages and members run the association. This gives us a unique grassroots association and our motto *'Together We Are Stronger'* has never been more relevant as we work with our national body on livestock transport issues.

LRTAV was established in 1985 as the peak body representing livestock transporters, and more broadly heavy vehicle transport, in Victoria. LRTAV is a federation member of the Australian Livestock and Rural Transporters Association (ALRTA). We have collaborated with the ALRTA and our state counterparts in developing our submission.

3 Defining Livestock

1. LRTAV support Option 2 that would introduce a national uniform livestock definition.
2. LRTAV agrees all livestock should be included in a national LLS.
3. LRTAV agrees that a national LLS should include the ability to mix loads of livestock species if each species is penned separately.

4 The regulation of conditions within a HVNL notice

1. LRTAV supports the continuation of the accreditation scheme including the requirement for livestock vehicles to be enrolled.
2. LRTAV supports the requirement for livestock vehicles and trailers to undergo an approval process upon entry to the scheme or when a change of ownership occurs.
3. LRTAV supports the requirement for owners, operators, drivers, schedulers and drovers to be enrolled, including participation in mandatory training. Training contributes significantly to overall road safety. It is important that all livestock supply chain partners undergo learning to ensure everyone is aware of their obligations under chain of responsibility and animal welfare.
 - a. LRTAV does not support the removal of the requirement for driver education due to the known increased risk of livestock vehicle rollover. Rather, LRTAV recommends that work is completed to mutually recognise existing state and territory-based training schemes. Currently, NSW and Victoria mutually recognise each state's scheme training.
4. Currently, VicRoads administers and maintains the scheme in conjunction with the National Heavy Vehicle Regulator. LRTAV recommends this role could be transferred to the NHVR to administer or delegated to livestock industry organisations in each state and territory.
5. Some other states have no training, and we recommend that VLLS 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.

5 Eligible Vehicles

1. LRTAV supports the introduction of a national uniform set of eligible vehicles, however not at the expense of limiting the current access in Victoria.
2. LRTAV agrees that a national livestock loading scheme should include all vehicles upwards from tray trucks including rigid trucks and trailers.
3. LRTAV recommends that guidance material be produced that describes each vehicle combination eligible to operate in the scheme.

6 Mass Limits

1. LRTAV members loading livestock adhere to and utilise the Australian Animal Welfare Guidelines – Land Transport of Livestock to determine appropriate penning density space. LRTAV recommends these guidelines also be reviewed to ensure they meet current welfare loading requirements.
2. LRTAV agrees mass limits should conform to the Land Transport Standards, inclusive of a 5% tolerance to account for occasions when the weight of the load is not provided or is an estimation (e.g., off-farm). With a signed weight document off farmer, agent, consignor or consignee.
3. LRTAV does not support group axle weights. Animal welfare standards should underpin best practice for the transport of livestock.
4. LRTAV supports TARE weights, however these should be realistic and assessed based on modern equipment the current scheme does not allow for. E.g., FUPS, AdBlue, refrigerated bunk air conditioners, self-contained living in vehicle to ensure social distancing, engine emissions, effluent tanks, EBS/ABS, safety requirements i.e., safety gates, catwalks, swingout ladders. TARE Weights should be based on a fully laden vehicle (including fuel, tools, spare tyres, blocks, jacks, drivers' belongings etc. ready for work) and confirmed by an S-10 certification plate (or similar). Vehicle certification should confirm both the vehicles TARE and NET weight in accordance with penning density space.
5. LRTAV agrees that TARE weights should be raised to an acceptable level. LRTAV proposes the following levels be deemed acceptable:
 - Prime mover = 13.0t
 - A-trailer = 10.0t
 - Tag trailer = 13.0t
 - Converter dolly = 4.5t
6. LRTAV agrees that where acceptable tare weights are exceeded, a fee of \$1000 per tonne or part thereof, be charged to the operator on a per annum cycle.
7. LRTAV agrees that 'outer limits' should be introduced for Nett Weight. LRTAV proposes that outer limits are equal to 12-tonne per deck of cattle.
 - a. 24 tonne Single
 - b. 36 tonne B Double
 - c. 48 tonne B Triple-A Double
 - d. 60 Tonne A B Triple
8. LRTAV agrees that if an operator is found in breach of penning density limits, all parties in the chain of responsibility should be subject to prosecution, including penalties and fines.

Furthermore, accreditation in the scheme should be cancelled if an operator is found to be continually breaching penning density limits.

9. LRTAV agrees that evidence of livestock weight must be provided to the operator for every load by the consignor or consignee.
10. LRTAV agrees that for the purpose of running out steer tyres and maximising their longevity, single tyres should be able to be fitted to on the middle axle of trailers or converter dollies.

7 Access

1. LRTAV agrees that outer mass limits for loading be 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 conditions and maintenance. Consequently, it is essential that there is no diminution of existing scope and access delivered under the existing State based Schemes.
2. LRTAV recommends that general farm-gate access be given to transport livestock under any national scheme for last mile access. Not to be granted for through travel.
3. LRTAV supports access under the Notice and the reduction of permits.
4. LRTAV supports the introduction of a Remote Access Scheme that affords additional tare weights for eligible vehicles operating in remote areas of Australia. These vehicles still need to be able to continue to their destination in all parts of Australia.

8 Reference Material

1. In a joint venture between the LRTAV and Department of Transport Victoria (DOTV), Tiger Spider has been engaged to develop a technical report which will support the case for the goals of the LRTAV High-Productivity Vehicle Group.
The scope of work focuses on the technical aspects of vehicle design, bridge axle spacing, dynamic performance and road safety of heavy livestock vehicles. It includes:
 - Background research and stakeholder engagement
 - Develop the extended Road Train and PBS Livestock Network
 - Review of desired livestock vehicle configuration and bridge axle spacings
 - Dynamic Performance Assessment and Payload Centre of Gravity (CG) height estimation methods for livestock Vehicles
 - Appropriate Operating and Access Conditions for Livestock Transport
 - Discussion and Recommendations

NHVR has been provided a copy of results from Stage One of this project - *Proposed Reference Vehicle and Network Map*. The research has been used as a reference tool for the LRTAV when creating this submission. LRTAV recommends NHVR also use this research as a Reference Tool when reviewing Livestock Loading Schemes.