

REVIEW OF LIVESTOCK MASS, DIMENSION AND LOADING ARRANGEMENTS – TMR Comments/Response	
Overall Comments	
<ul style="list-style-type: none"> The Department of Transport and Main Roads (TMR broadly supports the NHVR's position to harmonise livestock transportation across jurisdictions, as appropriate. TMR would support enhanced assurance systems to support long-term safe and sustainable access for the transportation of livestock. TMR would support approaches that would manage suitable mass limits and networks that would assist in the safe and sustainable management of Queensland's road infrastructure. 	
NHVR Questions	TMR Response
Section 6: DEFINING LIVESTOCK	
6.4.1 Are there any potential issues with Option 2 about which the NHVR should be made aware?	The Queensland livestock loading exemption was developed firstly with animal welfare in mind. Accordingly, the scheme should be limited to animals that are sensitive to load density.
6.4.2 Does Table 1 list all types of livestock that would benefit from being included in livestock notices and livestock loading schemes, or are any missing?	TMR is supportive of the defined livestock species listed in Table 1. TMR is not supportive of the term "other livestock".
Section 7: THE REGULATION OF CONDITIONS WITHIN A HVNL NOTICE	
7.9.1 Considering the respective roles of the HVNL/NHVR, and those other laws (e.g., for animal welfare protection) and their state and territory regulators (transport agencies or otherwise) - which of the two options would be best?	Option 2 is TMR's preference: Remove the scheme requirements as a notice condition.
7.9.2 Is there evidence to support safer outcomes of mandating livestock loading driver training? Or are workplace health and safety laws, and the HVNL general safety duty adequate to ensure drivers are appropriately trained and skilled?	TMR does not currently include driver training as a requirement of transporting livestock. However, TMR would potentially support the development of an industry code, or similar, for best practice livestock operator training.
7.9.3 Are the livestock loading schemes still required to regulate conditions outside the powers of the NHVR? If so, what purpose would the livestock loading schemes serve and which organisation should administer them? What other options are there to manage scheme enrolment?	TMR uses the word "scheme" when referring to livestock loading. Currently the only additional requirement in Queensland relates to having a S10 certification that is addressed in the current Queensland Class 3 Livestock Loading Exemption Notice 2019. TMR wishes to retain S10.

<p>7.9.4 After enrolment in a scheme, when is unladen vehicle tare mass checked?</p>	<p>TMR does not require any routine checks of trailer tare masses as part of the S10 certification. However there have been instances where compliance officers have checked livestock trailer tare mass compliance.</p>
<p>Section 8: MASS LIMITS</p>	
<p>8.9.1 How well are operators managing compliance with prescriptive numerical mass limits? Are there any particular challenges?</p>	<p>Queensland currently has limited, prescriptive numerical mass limits for livestock loading. The S10 certification was originally designed to limit axle masses by limiting trailer deck capacity and tare masses.</p> <p>Due to the remote nature of some of the livestock operations, the low compliance activity during the COVID pandemic and no telematics requirements on these vehicles, the current level of compliance is not clearly known at present.</p>
<p>8.9.2 Are there regulatory requirements (other than the HVNL) affecting how operators manage livestock loading?</p>	<p>Queensland registration requirements and how Livestock Loading Vehicle's registration are processed require S10 modification certification and 'purpose of use' recorded as Livestock in TRAILS. Animal welfare regulatory requirements are also pertinent.</p>
<p>8.9.3 Are there any issues associated with livestock transport mass limits not addressed in this paper?</p>	<p>The discussion paper did not address the ability for industry to manage loading and animal welfare through changed loading behaviour such as partitioning or gating.</p>
<p>8.9.4 Do you agree with our assessments of volumetric loading and its effect on road infrastructure?</p>	<p>The discussion paper did not address:</p> <ul style="list-style-type: none"> • structural impacts of livestock loaded vehicles. • Pavement impacts adequately.
<p>Section 9: ELIGIBLE VEHICLES</p>	
<p>9.8.1 Is Option 2 suitable to harmonise eligible vehicle types across borders? What other options are there?</p>	<p>Livestock loading in Queensland currently provides a mass exemption to most vehicles or combinations that are already approved to operate under this scheme. There is a requirement for any component in the combination to be certified under the S10 code.</p>
<p>9.8.2 Have we excluded any factors that should be used to assess vehicle eligibility for livestock transport?</p>	<p>As above (9.8.1) and structural capacity.</p>

<p>9.8.3 How have jurisdictions assessed which vehicles to make eligible under their state notices?</p>	<p>TMR has broadly applied livestock loading to most heavy vehicle types. However certain axle groups have been limited or may not be eligible. Limited studies have been conducted of the impacts and safety benefits of different vehicle types.</p>
<p>9.8.4 Are there options to better utilise PBS vehicles in livestock transport and overcome the identified barriers?</p>	<p>TMR would be supportive of the utilisation of PBS vehicles for the transportation of livestock, noting that PBS vehicles are limited to HML and upper GCM limits.</p>
<p>Section 10: ROAD NETWORKS</p>	
<p>10.8.1 Are there options for the livestock industry, state, and territory transport agencies and the NHVR to better support road managers in improving livestock transport access, such as by helping them with gazetting more roads under notice?</p>	<p>Currently Queensland provides access to all roads provided they are approved for the configuration type and suitably s10 certified.</p>
<p>10.8.2 Is Transport for New South Wales' Farm Gate initiative an approach that could be adopted in other states and territories, as an initiative to improve livestock transport access?</p>	<p>Under the current livestock loading mass exemption, Queensland is not experiencing the same access issues as New South Wales.</p>