



QUEENSLAND
FARMERS'
FEDERATION

Heavy Vehicle National Law Review

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The united voice of
Queensland agriculture

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This submission is provided to:

National Transport Commission

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Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

About the Queensland Farmers' Federation



The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

We are a member-based organisation representing the interests of peak agriculture industry organisations, both state and national. Through our members QFF represents more than 13,000 primary producers across the cotton, sugarcane, horticulture, dairy, nursery and garden, poultry, eggs, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

Submission

QFF welcomes the opportunity to provide comment on the Heavy Vehicle National Law review.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Overview

The Heavy Vehicle National Law (HVNL) review addresses 3 key areas including fatigue management, general access limits and the National Heavy Vehicle Accreditation Scheme (NHVAS). QFF support the regular and transparent monitoring of the current framework and its limitations, as well as data driven changes to this legislation. The current HV law, while comprehensive, does not adequately address the diverse haul periods and varying risk profiles across heavy vehicle industries, particularly in regards to fatigue management and the NHVAS. QFF highlights that any amendments to these sections, should not only enhance HV safety, but also consider the practical realities and varying risk levels within the heavy vehicle sector. Amendments to the HVNL which prioritise productivity and protect primary producers in the transportation sector would also be supported.

To address the Commission's series of questions upon the review, QFF has provided the below feedback and suggestions. These can be summarised as:

- QFF is not supportive of the removal of current work diary exemption for local work drivers.

- QFF would support *practical* amendments to FM requirements that maintain or enhance safety management for HVs, without imposing undue strain on operators.
- QFF are supportive of consulting on and investigating mass and dimension limit reforms for general access.
- Inspection scheduling, criteria and annual reporting requirements need to be scaled with risk profiles accordingly. The extensive criteria that needs to be supplied is a large time burden for small businesses.
- QFF supports the recommendation to include ‘primary production’ as an ‘industry sector’ factor which can have significant weight in directing a HV classification towards ‘low risk’.

Fatigue Management

Of concern is the proposed fatigue management (FM) reform options, in particular the removal of the current work diary exemption for local work drivers. Local HV drivers travel shorter distances and hours than long-haul operators and as such are low risk for fatigue monitoring. QFF are supportive of practices that eliminate duplicative requirements and streamline administrative processes applicable to heavy vehicles (HV) and understand that this should not be at the expense of workplace health and safety standards. However, the answer to lowering Queensland’s HV fatigue offenses is not the implementation of impractical and unnecessary regulations on low risk local HV drivers. QFF would support *practical* amendments to FM requirements that maintain or enhance safety management for HVs, without imposing undue strain on operators.

QFF suggests adopting an updated approach to addressing fatigue management offenses—leveraging educational measures rather than solely punitive actions. There is a need for a more nuanced and case-by-case consideration of fatigue-related offenses, a system that includes proactive education and warnings alongside more formal measures. QFF stresses the importance of instigating a shift in attitudes toward fatigue management, as it is a vital component for bringing about effective and sustainable change within the industry.

Access

QFF are supportive of consulting on and investigating mass and dimension limit reforms for general access. The suggested limit changes appear unproblematic, relatively minor and would be acceptable for most HVs across industry.

Operator assurance and inspection schemes

The HVNL review states the proposed NAS changes would improve robustness of the current audit standards as well as the consistency of these standards across accreditation schemes. There is a lack of mutual alignment across accreditation schemes within Australia, however comparably, Queensland is somewhat rigorous with HV standards and inspection regimes when evaluated against surrounding states. In-line with the recent feedback provided regarding the Best Practice Review 2017, QFF would support an approach to workplace health and safety that increases safety across industry but also doesn’t hinder workplace productivity or create undue financial burdens on small businesses. Annual inspections may make sense for high-risk heavy vehicles in industries such as mining or commercial freight, which are long-haul, high usage and high risk. However, inspection scheduling, criteria and annual reporting requirements need to be scaled with risk profiles accordingly, as the extensive criteria that needs to be supplied is a large time burden for small businesses.

It is understandable increased measures would be implemented at high risk levels; however, it is important to avoid unnecessary red tape for low-risk operators and businesses. QFF support the right to review risk classifications, however, revocations of classification should not be required if risk profiles are developed well and identified properly. QFF supports the recommendation from other industry bodies to include 'primary production' as an 'industry sector' factor which can have significant weight in directing a classification towards 'low risk'. This is particularly pertinent to the Queensland sugarcane industry and QFF's industry member CANEGROWERS. Vast majority of these HVs are only in use seasonally, during the crushing season from June-December, and larger vehicles such as harvesters (21-22t) are floated for movement. Other tractors and haul out vehicles are used predominately on farm roads and headlands and in general travel low distances and hours. Due to their low risk, maintenance for these HVs is commonly carried out on farm by the producer (with the appropriate experience) or a local diesel mechanic. The link between age vs usage also needs to be considered in risk profiling, as with HVs similar to the above, the low-level hours/months of usage per year will lower the risk normally associated with older vehicles. QFF advocates for a logical and industry directed approach to HV risk classification.

Yours sincerely



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