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National Transport Commission  
Level 3, 600 Bourke Street  
Melbourne VIC 3000

Via email: [HVLNteam@ntc.gov.au](mailto:HVLNteam@ntc.gov.au)

Australian Lot Feeders' Association (ALFA) welcomes the opportunity to make a submission to the Heavy Vehicle National Law Review.

ALFA is the Peak Industry Council representing 356 accredited cattle feedlots, with approximately 1.4 million cattle on feed. The feedlot industry makes up 47% of the cattle slaughtered in Australia and contributes to over 35% of Australia's total beef exports. As a key contributor to a trade-exposed industry, up-stream supply chain operators, such as meat processors, retailers, and exporters, rely heavily on the feedlot industry for the supply and export of high quality, safe, grain-fed beef to feed families in Australia and abroad.

Heavy vehicle transport is a significant aspect of lot feeding. The feedlot industry relies on the use of heavy vehicles to transport cattle to and from feedlots as well as for the delivery of feed commodities.

ALFA and its members recommend that the National Transport Commission (NTC) consider the following key issues within the Heavy Vehicle National Law Review:

#### Fatigue Management

ALFA acknowledges that fatigue management and record keeping is an important part of road safety. ALFA supports consistent, proactive, risk-based fatigue management requirements for all heavy vehicles over 4.5 tonnes. Drivers should be empowered to proactively manage fatigue and stop when they are tired. Drivers and operators should have the appropriate level of flexibility to ensure that they are able to rest at times that support their individual needs and cater for the range of tasks and general variability of the freight industry.

As the Peak Industry Council for the feedlot industry, ALFA supports the highest achievable animal welfare standards. Fatigue management strategies must ensure animal welfare is maintained during the transport of livestock, including minimising time off food and water. Operators and drivers should be able to manage fatigue in a way that does not create adverse animal welfare outcomes. The NTC should consider the *Australian Animal Welfare Standards and Guidelines - Land Transport of Livestock* as part of the Heavy Vehicle National Law Review. The standards provide a basis for developing and implementing consistent legislation and enforcement across Australia, and provide guidance for all people responsible for livestock during transport. They are based on current

scientific knowledge, recommended industry practice and community expectations. ALFA urges NTC to balance animal welfare and driver fatigue priorities in the review.

Further, fatigue management record keeping requirements should be clear and ensure accountability, whilst not creating unnecessary onus or administrative burden. Heavy Vehicle National Law must acknowledge and be adaptable to the growing opportunity to use fatigue safety technology. There must be provisions that provide an incentive for drivers and operators to invest in a safety and risk-based approach to the management and monitoring of driver fatigue.

#### Mass, Dimensions and Loading

ALFA supports increasing limits to general access to the road network to reduce regulatory burden and allow for increased productivity within the freight industry. This includes increasing the prescribed height limit to 4.6 metres and increasing the length limit for vehicles.

ALFA has heard from members and that some operators are required to apply for over 500 permits per month to transport livestock through the supply chain. Increasing the general access limits would reduce the need for permits to access road networks already being used by heavy vehicles to transport livestock and feed commodities. ALFA notes the importance of ensuring that this is complemented by adequate road maintenance to ensure road safety for all road users. Further, there needs to be a simplified application and timely approval process for road network access in emergency events, such as fires or floods. This is particularly important for the feedlot industry, as livestock and feed commodities must continue to be transported to ensure positive animal welfare outcomes.

ALFA supports the implementation of trailer stability controls and height data mapping tools to mitigate the risks regarding possible increases in rollovers and issues with clearance heights. The increase in productivity and reduced regulatory burden outweighs the risks posed by not increasing height limits.

ALFA acknowledges that there are a number of challenges associated with road network access across jurisdictions. Heavy vehicles must have access to road networks to ensure that livestock and commodities are able to be transported between producers, lot feeders and processors.

#### General

ALFA is supportive of measures that harmonise auditing and assurance measures across the supply chain. The development and adoption of a national audit standard should seek to reduce administrative burden on operators whilst ensuring safety objectives are achieved.

Thank you for the opportunity to make a submission on the Heavy Vehicle National Law Review. Should you have any questions or require further information, please contact [policy@feedlots.com.au](mailto:policy@feedlots.com.au) or (02) 9290 3700.

Sincerely,



Michael Lancaster  
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**Australian Lot Feeders' Association**