

Transport of Wool Bales

Regardless of the density, cut, quality of the wool, the type of wool press used and the expertise of the wool-presser the wool bale invariably bulges at the end away from the seam. The Association would like to see Vehicle Regulation Notice 40 reintroduced which states that if the seams of the wool bales are loaded so that they are within the 2.5 metre width of the truck, even if the bulge of the bale creates a width breach, they should be classified as a legal load. Moreover the downward horizontal angle along the bale towards the centre of the truck that is created when the outer seam of the bale is resting on top of the gunnel rail actually creates a safer foundation for the load to be carried, resulting in a more stable load.

Transport of Hay Bales

NSW is the only major hay producing State which does not have width limits of 2.7 m for hay bales. Victoria, South Australia and Western Australia all have 2.7 m. The Association seeks that the NSW legislation move from the current width limit for Hay Bales of 2.5 metres to the Victorian standards of 4.6 metres high and 2.7 metres wide.

In NSW the *Class 3 Baled or Rolled Hay and Straw (Disaster Relief) Exemption Notice 2011* has allowed hay loads up to 2.7 metres and previously the *General Oversize (Baled or Rolled Hay) (Drought Assistance) Exemption Notice 2007* and the *General Oversize (Baled or Rolled Hay) (Bushfire Assistance) Exemption Notice 2009* allowed hay loads up to 2.83 metres, with no width related transport problems reported. An information bulletin from VicRoads is included with this briefing note.

Volumetric Livestock Loading

Current NSW provisions regarding livestock and grain handling are prescriptive, and inconsistent with Victoria and QLD.

Under the previous Government, agricultural producers in NSW were burdened by inefficient transport policies. If the NSW agricultural sector is to remain price competitive in international markets and overcome the wide geographic spread of the State's producers, it must have the support of an efficient transport infrastructure network.

The Association is strongly supportive of livestock loading schemes that are safe, simple and improve productivity outcomes. The long-standing Victorian and Queensland Livestock Loading Schemes facilitate the safe and efficient transportation of livestock by:

- Reducing the chances of animals being injured
- Increasing the productivity of livestock transport
- Protecting road and bridge infrastructure
- Reducing the chances of vehicles rolling over

Scheme participants in Victoria and Queensland are exempt from complying with vehicle mass limits so long as they comply with animal welfare legislation and manufacturer's ratings. The mass requirements are dictated by tare weights and stocking density. The Association calls on the NSW Government to introduce this policy in NSW. Not only will this increase the productivity of regional NSW, it will also lead to cross-border efficiencies. An information bulletin from VicRoads is included with this briefing note.

Grain Harvest Management Scheme

In Queensland there is a Grain Harvest Management Scheme ('GHMS') which permits those drivers registered in the scheme a degree of flexibility in truck masses. The Association is calling for this scheme to be implemented in NSW with a flexibility of 10% for accredited participants. Due to vagaries associated with loading grain ex-farm at harvest time, this flexibility would better enable compliance with road

transport legislation, and the opportunity for NSW farmers to compete on a level playing field with other States.

Transport of Machinery

The face of agriculture is changing with agricultural equipment becoming larger to achieve economies of scale. Farmers need to be able to continue carrying on with their businesses without overly burdensome limitations.

Grain Augers

Grain augers have increased in size for on-farm occupational, health and safety reasons, to cope with the geometry of increasing silo sizes to improve economies of scale. Due to occupational health and safety reasons, these augers are required to be constructed at an approved industrial site, and then towed to the farm. They cannot be dismantled, transported and then put back together again on-farm, as the requirements for lifting apparatus, and other site requirements make this practice impossible. The majority of augers, once on-farm, are no longer required to be transported on the road.

The Association seeks an amendment to the Grain Auger Combination Exemption Notice 2010 to allow auger combinations up to 35 metres in length and a rear overhang maximum of 60% instead of the current 53%.

Fodder Carrying Trailers

The Association has been advised by the RTA that trailers designed for carrying fodder towed behind a conditionally registered vehicle (i.e. tractor) cannot be fodder laden if wider than 2.5m. The Association is requesting an exemption so that fodder carrying trailers wider than 2.5m can be laden, if travelling short distances between farm blocks to feed livestock, provided that they meet certain access, loading, dimension and construction requirements.

Details gathered from the Association's 2010 survey of its Members have shown that the mean distance travelled between farms is 17.9km (which becomes 12km when the top 5% are removed). Of the 133 responses, 68.4% were <2.5m, 22.6% between 2.5 and 3m and 9% between 3m and 4m (most of these 9% were grain chaser bins which travel unladen anyway).

An extension to 3m would require an amendment to clause 3.1(b) of the *General Class 1 Oversize (Agricultural Vehicles) Notice 2007*. The Victorian Agriculture Minister Joe Helper in 2010 announced a similar exemption allowing silage trailers to be up to 3m wide and to be towed laden on the road without registration. Trailers that do not meet the standards for registration - for example, if they are not fitted with the required type of brakes - will be allowed to operate on the roads under strict operating conditions, including how far they can travel and at what speed. Silage trailers constructed from July 1 onwards will need to meet the standards for registration, except for the width requirement. Older silage trailers will have until 2015 to comply with normal trailer braking and tow coupling requirements. An information bulletin from VicRoads is included with this briefing note.

There have also been instances of tractors not able to carry hay bales down the road as it is classified as a conditionally registered vehicle, and conditionally registered vehicles are not permitted to carry a load. Surely common sense should prevail. The Association seeks an exemption for conditionally registered vehicles such as tractors to be able to carry a round bale or large square bale of hay on hay forks.

Road Access

The Association is seeking more access for more efficient transport means such as B-Doubles and Road Trains. These type of trucks are no less damaging to roads than semi-trailers if they are corresponding to the manufacturer's specifications of mass per axle.

Newell Highway

The Association does not want lack of spending on arterial roads such as the Newell Highway to be an excuse for lowering the speed limit. The Association recommends more overtaking lanes be built on the Newell, at least one every 20 km, and the speed limit be restored to 110 km/hr.

NSW Grain Freight Review

The NSW Grain Freight Review recommended the NSW Government set up a Grains Industry Coordination Forum to remedy identified gaps in the grain road network to ensure Higher Mass Limit (HML) operation is possible on all critical grain routes. Of approximately 185,000 kms of total road network in NSW, there is a mere 15,000 km appropriate for HML access. Moreover the lack of interconnectivity between the HML routes in the network compounds the inadequacy of this asset.

National Heavy Vehicle Regulator

The Association has concerns that the Regulator and the Law could result in another layer of bureaucracy which will make it difficult for state based organisations such as ourselves to have realistic access to decision makers. Great uncertainty remains around the funding, structure and role of the Regulator. It is claimed that securing 'last mile' access will now be easier and fairer because the Regulator can co-ordinate access request on behalf of the operators; it is uncertain how this will change the dynamics of the current arrangements and lead to better outcomes. It is imperative that productivity variations that provide the most benefit are nationalised in absence of a case as to why they are not suitable for transfer across jurisdictions.

Transport Policy in NSW

Currently the RTA is the judge, jury and execution within NSW. The separation of the RTA's roles of an infrastructure provider, a road safety monitor and a service provider would remove this conflict of interest. This change will also allow a much needed focus on improving the economic efficiency of NSW's road network.

The Association has lobbied for the creation a Department of Regional Roads to address the metropolitan focus of policy-making in NSW. This will also allow for the provision of customer service to rural and regional residents, who currently have great difficulty in obtaining information from the RTA's Sydney Office.

Overzealous enforcement activities

Members have been fined for having an oversize sign which is 150 mm too high and for having a ripped red flag. RTA compliance and enforcement staff claim that hay and silage must be covered, as it deemed to be rubbish by the RTA, even though it is organic matter.

Weighing of Trucks on unlevel surfaces

Quite often trucks are pulled up by the RTA and weighed on uneven surfaces adjacent to country roads during harvest periods. The split axle weights are often unreliable due to the uneven surfaces and should be disregarded. Trucks should only be weighed on level surfaces at accredited weighing sites to ensure that road-users are not being unduly fined.

Heavy Combination Licence Requirement

A Heavy Combination (HC) Licence is required to drive a tractor with a silage trailer, due to the combination forming a heavy vehicle combination, even if the trailer only has to travel a short distance between farms to feed livestock. This licence category mostly requires competency based assessment, which can come at a cost of up to \$1000. Tractor and trailer combinations are completely different to

truck and trailer combinations. Tractors are not designed to cover long distances and generally do not travel greater than 40km/hr. This requirement should be removed.

Registration of oversize loads on trailers if load is a divisible item

A case study of an Association member has shown a header and comb trailer to be 23 m in total length. The maximum length for a divisible load is 19 m. Therefore the two items must be loaded on two separate low-loader trailers, thus doubling the cost to transport them. Due to the Member not having the finances after 10 years of drought to purchase this extra equipment, his contract harvesting work is restricted. The Association seeks for the increase the length for oversize loads (such as header and comb trailers on a low loader) from 19 metres to 23 metres.

Clarification on Requirement for Police Escorts for Oversize Equipment

The Association has had conflicting reports from the Police compared to the RTA regarding the requirement for police escorts, when transporting oversize agricultural equipment (eg header or airseeder), as per the *General Class 1 Oversize (Agricultural Vehicle) Notice 2007*. The Police have a maximum width of 5.6 m before it is necessary for a police escort (which is applicable only in the southern region – what is the southern region?) whereas the RTA (as per the Notice) have a maximum width of 6m before it is necessary to “contact police”.

Further confusion arises when consideration has to be given to what is a major and minor route (as requirements for escorts differ between major or minor roads), and whether terrain limits a clear view of approaching traffic to less than 500 m. If a police escort is required, at least 2 days notice needs to be provided to the Police. The police car costs \$480 per day. Sometimes due to weather constraints impeding upon farming operations such as grain harvest, providing notice is not always feasible. Ultimately harmonisation between Police and RTA inspector's interpretation of the regulation should be an imperative.

PILOT VEHICLES - Daytime Pilot Requirements for agricultural vehicles (regardless of which zone in being travelled)

Area of operation	Vehicles wider than 3.7m but not wider than 4.5m	Vehicles wider than 4.5m but not wider than 6m	Vehicles wider than 6m
If terrain limits a clear view of approaching traffic to less than 500m	1 pilot vehicle	2 pilot vehicles	2 pilots and contact police
A major road	1 pilot vehicle	2 pilot vehicles	2 pilot vehicles and contact police
If there is a clear view of approaching traffic for at least 500m, but not on a major road	No pilot vehicle required	1 pilot vehicle	2 pilots and contact police

No Travel During Public Holiday Period for Oversize Equipment

Another concern for many farmers, particularly in southern areas of the State where grain harvest is still in full swing around the Christmas/New Year period, is the inability to transport oversize equipment in a public holiday period. Around Christmas the public holiday period is classified as between sunrise 23 December until sunset 3 January. As soon as the crop is ripe it must be harvested as soon as possible.