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Productivity Commission Locked Bag 2, Collins St East Melbourne VIC 8003

Lodged via on-line portal:

19th December 2025

## **RE: Public Consultation – Impacts of Heavy Vehicle Reform**

Dear Sir/Madam,

Please find below Grain Trade Australia's (GTA's) submission to the Productivity Commission 'Impacts of Heavy Vehicle Reform' (Reforms) consultation.

## Introduction

Grain Trade Australia (GTA) welcomes the opportunity to respond to this Productivity Commission consultation. GTA members (see <u>Link:</u> and attached below) are intrinsically involved across the Australian grain supply chain—including grain receival/storage sites, bulk terminals, transport operators, and technology providers. Any improvements in heavy vehicle reform will substantially assist in the transport of grain throughout the grain supply chain and will have flow on efficiency benefits for all participants.

## **About Grain Trade Australia (GTA)**

Grain Trade Australia is the peak industry body representing the commercial grain supply chain in Australia. GTA's members include grain marketers, storage and handling companies, transport operators, exporters, and technology providers. GTA works to:

- Promote trade facilitation and supply chain efficiency
- Develop and maintain industry standards, codes of practice, standard form contracts and trade rules
- Advocate for regulatory frameworks that support safe, efficient, and competitive grain supply chains
- Provide training, technical guidance, and dispute resolution services to support industry professionalism and compliance.

Our submission draws extensively from the principles and responsibilities embedded in the <u>GTA Transport Code of Practice</u>, which has been in place in the grain industry since 2014. The GTA Transport Code of Practice is a key element of the Australian grain industry self-regulatory framework. It sets out industry-endorsed obligations for safe and compliant transport operations, including load management, vehicle standards, fatigue, and chain of responsibility. This Code has been widely adopted by GTA members and provides a practical benchmark for aligning industry practice with NHVR's regulatory objectives.

In terms of key focus areas of the Productivity Commission Reforms GTA offers the following feedback and recommendations:

 Increasing heavy vehicle road access to increase productivity and to reduce emissions:

The grain industry strongly supports initiatives to increase road access for high-productivity freight (PBS) vehicles as a means of reducing emissions while maintaining the efficiency and competitiveness of Australia's grain supply chain.

Current road access arrangements and mass limits restrict where PBS vehicles can operate, particularly on first- and last-mile routes between farms, receival sites, rail terminals, and ports. These constraints limit the productivity benefits PBS vehicles are designed to deliver and reduce the efficiency of grain movements, particularly during peak harvest and export periods.

Expanding road access for PBS vehicles in conjunction with improving the access arrangements and processes of attaining permits would allow more grain to be transported per journey, reducing the total number of truck movements required. This would:

- Improve efficiency during harvest and export task peaks
- Reduce congestion on regional and arterial roads
- Lower freight costs per tonne for the grain industry
- Improve reliability and resilience across the grain supply chain

Given the seasonal and time-critical nature of grain movements, access to high-productivity vehicles is essential to ensuring grain can be moved efficiently.

## **Priority Actions**

The grain industry supports the following targeted actions to unlock the full productivity benefits of PBS vehicles:

- Expanding approved PBS road access networks, particularly on key grain freight corridors and first- and last-mile routes servicing farms, grain receival sites, intermodal terminals, and export facilities.
- Remove any burdensome steps associated with the PBS permit application approval process. As well as the focus on removal of bureaucracy there are also benefits that may be achieved through streamlining the existing regulatory and administrative frameworks.
- Targeted investment in regional road and bridge upgrades to remove infrastructure constraints that unnecessarily limit PBS access, based on clear evidence of freight demand and network importance.
- Increase the focus and resources to support the implementation of a true National Regulatory system for heavy vehicles. Current arrangements across the multiple jurisdictions lead to inefficiencies, administrative burdens and limit the potential that PBS vehicles can bring to the industry. Government has an opportunity to reform these arrangements to deliver productivity.

GTA extends its appreciation for this consultative process and looks forward to continuing to be informed and involved as this important work proceeds. Reform is required and would be welcomed as it will deliver a safer, more competitive and efficient grain supply chains for the benefit of all stakeholders.

Please do not hesitate to contact GTA at any stage.

Yours faithfully,

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Pat O'Shannassy

CEO, Grain Trade Australia



Membership List as of 25 November 2025

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Ag Connex Pty Ltd	Geoff Barker	www.agconnex.com.au
Agmark Commodities	Richard Alcorn	www.agmark.com.au
Agri Om Australia Pty Ltd	Kishore Bulchandani	www.agriom.com.au
Alliance Grains	Luke Walker	www.alliancegrains.com.au
Arya Pulses Australia Pty Ltd	Aravindhan Ravindraraj	www.aryapulses.com.au
A T Waterfield & Son Pty Ltd	Brad Waterfield	linkedin.com/in/brad-waterfield-8767869b
Australian Choice Exports Pty Ltd	James Hunt	www.australianchoiceexports.com.au
Australian Country Choice Feedlots	Brad Taylor	https://www.accbeef.net.au/
Australian Grain Storage	Matt Bailey	www.sunrice.com.au
Australian Growers Direct Pty Ltd	Tyrone Stowers	www.ausgrowersdirect.com.au
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Australian Mungbean Company Pty Ltd	Damien White	www.australianmungbean.com.au
A W Vater & Co	Kim Vater	www.vater.com.au
Baker Grain	Richard Baker	www.bakergrain.com.au
Ballarat Grain	Ashley Haase	
Boort Grain Co-Operative	Jon Bucknall	www.boortco-op.com.au
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C & S Trading Pty Ltd	Craig Scholz	www.scholzbh.com.au
Carpendale Agri Pty Ltd	Andrew Kluck	www.carpendale.com.au
Carson Stockfeed Pty Ltd	John Carson	03 6634 7376
CHA Pacific Pty Ltd	Ryan Yang	http://www.chapacific.com.au/
Chester Commodities	Richard Black	www.chestercommodities.com.au
C K Tremlett Pty Ltd	Andrew Tremlett	linkedin.com/in/andrew-tremlett-36a06385
CL Commodities	Robert Lean	www.clcommodities.com.au
Coorow Seeds	Brian Pover	www.coorowseeds.com.au
Cory Johnston (Aust) Pty Ltd	Alicia Dolan	www.coryjohnston.com.au
Defiance Maize Products Pty Ltd		
·	Rodney Walker	www.corson.co.nz
Direct Commodities	Hamish Robertson	<u>www.directcommodities.com.au</u>
DSL Pacific	Katarina Lindkvist	https://www.dslpacific.com/
East Coast Stockfeeds	Stuart Dolden	www.ecsf.com.au
Ellerslie Free Range Farms Pty Ltd	Maria Sue-Tin	www.dahall.com.au
ETG Processing Pty Ltd T/A Wimpak	Brock Tait	www.wimpak.com.au
Excel Farms	Nicholas Paterson	excelfarms.com.au
Export Import Australia	Dhanesh Kumar	www.exportimportaustralia.com.au
Export Trading Group Australia Pty Ltd	Cassandra Tipler	www.etgworld.com
Fanmac Logisitics Pty Ltd	Chris Fanning	www.fanmacag.com.au
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Grainforce Pty Ltd	Stella Larnach	<u>www.grainforce.com</u>
Grain Link WA Pty Ltd	Andrew Goyder	www.grainlink.com.au
Grenfell Commodities Pty Ltd	Peter Gordon Mawhinney	www.grenfellcomm.com.au
GV Grain & Fodder	Joanne Harry	linkedin.com/in/joanne-harry-707119116
	·	IIII/REGITI.COM/III/JOANNE-HAITY-707119110
Harrold Pastoral Co	Patrick Harrold	
Harwood Grains & Stockfeeds	Paul Harwood	www.harwoodgrains.com.au
Horizon Commodities Pty Ltd	Aaron Jones	www.horizoncommodities.com.au
Jatlee Australia	Sunil Kumar	www.jatleecorp.com
JH Grain Pty Ltd	Geoff Zhou	www.jhgrain.com.au
J W Koek & Company	Brian Algate	07 3341 4548
J W KOEK & Company	Dilali Algale	07 5541 4546
Kangaroo Island Pure Grain	Emma Tonkin	www.kipuregrain.com
Kangaroo Island Pure Grain KB Agri Services Pty Ltd	Emma Tonkin Karl Bliss	www.kipuregrain.com linkedin.com/in/karl-bliss-916bb679
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Symbio Laboratories Kristian Just <u>www.symbiolabs.com.au</u>	
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Amspec Australia Lee Shilvock <u>www.amspecgroup.com.au</u>	
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AgriDigital Emma Weston <u>www.agridigital.io</u>	
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Aperture Ag Pty Ltd Alex Campbell <u>www.apertureag.com.au</u>	
Basis Commodities Chris Whitwell <u>www.basiscommodities.com</u>	
BSM Global Jason Flemming <u>www.buysellmove.com</u>	
Cloudbreak Grain Marketing Ed Scamps <u>www.cloudbreak.com.au</u>	
Cropify Anna Falkiner <u>www.cropify.io</u>	
Delta Agribusiness   Michael Parry   www.deltaag.com.au	
E P Integrated Commodities Tracey Lehmann <u>epicbrokers.biz</u>	
Farmanco Marketing Pty Ltd Donald McTaggart <u>www.farmanco.com.au</u>	
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Goldstar Commodities Geoff Webb www.goldstarcommodities.com.au	
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	Saputo Dairy Australia	Ashley Denishensky	<u>www.saputo.com</u>
	SGA Solutions Pty Ltd	David Hudson	linkedin.com/in/david-hudson-8240b913
	Sizer & Cogill (T/A NQ Bulk)	Chris Sizer	www.sizercogill.com.au
	Ten Tigers	Chris Tonkin	www.tentigers.com.au
	TE Storage & Logistics Pty Ltd	Tom Hage	www.testorage.com.au
	TT Club Mutual Insurance	Rhys Richards	www.ttclub.com
	Wattletree Consulting	Joe Righetti	www.wattletree.net.au
	Windarra Grain Storage	Jessica Russ	https://www.facebook.com/p/Windarra-Grain-Storage-Pty-Ltd-61553819494644/
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International Affiliate	CIS Commodity Inspection Services	Paul Schweitzer	www.cis-inspections.com
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Industry Association	Grain Growers Limited (GGL)	Shona Gawel	www.graingrowers.com.au
	Grain Industry Association of WA (GIWA)	Peter Nash	www.giwa.org.au
	Grain Producers Australia Ltd (GPA)	Colin Bettles	www.grainproducers.com.au
	NSW Farmers Association	Elen Welch	www.nswfarmers.org.au
	Stock Feed Manufacturers' Council of Australia (SFMCA)	Ellen Buckle	www.sfmca.com.au
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Merchant Association	Grain Industry Association of SA (GIASA)	Marie Cunningham	www.giasa.org.au
	Grain Industry Association of VIC (GIAV)	Georgie van Beek	www.giav.com.au
	Grain NSW	Joanne Ware	www.grainnsw.com.au
	Queensland Agricultural Merchants (QAM)	Rob Imray	www.qam.org.au
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