



NATIONAL FREIGHT DATA HUB OPTIONS DISCUSSION PAPER

DEPARTMENT OF INFRASTRUCTURE, TRANSPORT, REGIONAL DEVELOPMENT AND COMMUNICATIONS

AUSTRALIAN TRUCKING ASSOCIATION & NATROAD SUBMISSION 16 SEPTEMBER 2020

1. About the ATA and NatRoad

The Australian Trucking Association and its member associations collectively represent 50,000 businesses and 200,000 people in the Australian trucking industry. Together we are committed to safety, professionalism and viability.

NatRoad is Australia's largest national representative road freight transport operators' association. NatRoad represents road freight operators, from owner-drivers to large fleet operators, general freight, road trains, livestock, tippers, car carriers, as well as tankers and refrigerated freight operators.

2. Summary of recommendations

Recommendation 1

The proposed hub design principles must be amended to incorporate:

- Data provision by industry to be voluntary
- Data to not be used for regulatory or enforcement purposes
- Confidentiality of firm and individual data
- Data should only be available in de-identified, aggregate form.

Recommendation 2

The hub must be linked to achieving outcomes including:

- National leadership of efforts to improve data
- Better infrastructure investment and management of urban traffic
- Development of key indicators, including on heavy vehicle access and land use encroachment of logistics sites
- Improved monitoring of freight bottlenecks, supply chain cost comparisons, how freight is moved
- Better accessibility of existing government data.

Recommendation 3

The proposed hub must not require additional regulation or cost burdens on industry.

3. Introduction and data principles

The National Freight Data Hub Options Discussion Paper was released by the Australian Government in August 2020. Due to the short consultation timeframe, during a global pandemic and the worst economic downturn since the Great Depression, this submission focuses on key priorities for the trucking industry and is unable to respond to every issue raised by the paper.

The ATA and NatRoad support improving data collection and frameworks, where that data will be utilised to achieve better outcomes for the trucking industry and meets industry principles for data collection and use.

Data principles which should be incorporated into the design of the National Freight Data Hub should include:

- Data provision by industry should be voluntary
- Data should not be used for regulatory or enforcement purposes
- Confidentiality of firm and individual data should be protected
- Data should only be available in de-identified, aggregate form.

This reflects recommendations from the ATA submission in 2017 to the National Infrastructure Data Collection and Dissemination Plan, and principles adopted by the Bureau of Infrastructure, Transport and Regional Economics in a project on heavy vehicle telematics data.

The incorporation of the above principles was important to developing industry trust and participation in the BITRE project.

These principles should be incorporated into the design principles for the hub. Currently, the discussion paper sets out the proposed design principles for the hub:

- Demonstrate value, early
- A trusted, independent facilitator
- Lead by example
- Data exchange is a collaboration
- High quality data and insights.

Recommendation 1

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4. Data outcomes

There will be no point to establishing the proposed hub if it is not connected to delivering clear outcomes. Data for the sake of data will not establish trust with industry.

The discussion paper sets out three purposes of the hub:

- **Evaluate the system.** Enable end-to-end performance evaluation of the freight system
- **Strategic planning.** Improve infrastructure and transport network investment, regulatory and other decisions
- **Operations.** Support day to day operations by fostering data standards and exchange, and providing timely insights about freight system performance and bottlenecks to industry.

Broadly, NatRoad and the ATA support these purposes. Specifically, the following outcomes should be an objective of the hub:

- **Improving infrastructure investment decisions.** This should be broader than identifying roads with increasing heavy vehicle traffic, and also include metrics to identify gaps in the network (such as access for high productivity freight vehicles and locations for rest areas).
- **National leadership.** Improving telematics data has been raised by the Productivity Commission, the NHVR, TCA, university projects and others. Multiple data projects that do not interact will not provide useful data outcomes on a national level.
- **Development of a heavy vehicle road access indicator.** This was previously proposed by BITRE and could potentially provide information including the percentage of the road network accessible to each heavy vehicle class and the percentage of producers within a set distance of network for each class. These should be made available by local government area.
- **Land use/encroachment indicator.** BITRE also previously proposed potential indicators for encroachment of key logistics sites, such as population and jobs density within a set distance or congestion on key roads approaching key logistics sites (such as a port or distribution centre).
- **Improved management of urban traffic.** There is potential for real-time data to better inform management of urban traffic, such as traffic light sequencing. This may require technology upgrades for road managers.
- **Freight bottlenecks.** The discussion paper sets out identifying physical and regulatory bottlenecks and barriers for freight movement as a foundation enduring question.
- **Monitoring international cost comparisons.** There is a critical public policy need to identify where Australia's supply chain costs become internationally uncompetitive.
- **How freight is being moved.** Consideration should be given to gaps in the NTC project *Who moves what where*.
- **Existing government data.** Existing data, such as from the ABS on numbers of businesses, employees and vehicles should be made easily accessible.

NatRoad has endorsed the NSW Freight Data Hub. The NSW Hub publishes freight data to support evidence-based policy, improve transparency and accountability and provide support for innovation.

Recommendation 2

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5. Other issues

Consistent with the ATA 2017 submission, the ATA and NatRoad do not support increasing regulation or costs on industry to meet the objectives of the proposed National Freight Data Hub. The discussion paper rightly identifies the Australian Government Guide to Regulation when discussing possible regulation.

Any proposal for new regulation or charges on industry would need to be subject to a Regulation Impact Statement.

Ultimately, if the hub was to levy additional costs and regulation on industry it would likely fail to deliver the value and trust that are part of the proposed design principles. It would also fail the wider test of achieving better outcomes for Australia's freight system. No justification has been made for additional regulation or costs.

Recommendation 3

The proposed hub must not require additional regulation or cost burdens on industry.

6. Consultation and contact

This submission has been developed in consultation with ATA and NatRoad members.

The contacts for this submission are:

ATA: Samuel Marks, Transport and Infrastructure Adviser, samuel.marks@truck.net.au and 02 6253 6923

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