



The Secretariat
Draft National Remote and Regional
Transport Strategy
NT Department of Transport
GPO Box 2520
DARWIN NT 0801

Dear Sir/Madam

National Remote and Regional Transport Strategy Consultation Draft

Thank you for the opportunity to comment on the draft *National Remote and Regional Transport Strategy* (NRRTS). Sensible steps towards national coordination of transport infrastructure are welcomed by the Australian Trucking Association, as are realistic plans for mitigating the many social and economic challenges facing rural Australians.

The strategy's long-term scope and goals are encouraging because our national capabilities will not be realised until all our communities are supported and their local resources unleashed to reach full potential. A weak rural Australia is disastrous for the entire country.

The NRRTS intends to lift productivity through better transport infrastructure supply and services. One strength is in the acknowledgement of the special conditions and limitations circumscribing quality of life for more isolated Australians. It implies that modern policy thinking must be integrated, and not confined to traditional cost benefit analyses, funding arrangements or to repeating historically uneven patterns of industry-government interaction. All Australians are stakeholders in the effort to lift the fortunes of rural Australia.

The implementation plan that is outlined is commendable in that it takes a logical approach to the allocation of roles and responsibilities for lifting productivity nationwide. It is hoped the strategy will also link explicitly to other pertinent national initiatives such as:

- Australia's economic development strategy, defence strategy, and trade and investment strategy
- Port strategies
- Bridges Renewal Program
- Heavy Vehicle Safety and Productivity Program
- National guidelines on transport system management
- Heavy vehicle road charging reform

Unleash productivity through better rural roads and better access

The road freight transport industry is strongly focused on establishment of nationally defined routes to support the larger heavy vehicle combinations that are undertaking the safest, most efficient and cost-effective freight tasks today.

High quality national freight arteries are needed for swift cross-country movements to port and through necessary urban areas. This helps avoid undue interference from road agencies or councils through endless first-last mile, bridge access or other approval processes.

Establishment of a high level, tiered approach to a national road network incorporating rural and remote arterials and strategic regional secondary roads is endorsed by the ATA. The 2013 PricewaterhouseCoopers report, *A Future Strategy to Road Supply and Charging*, recommended this network approach to target investment and lead to improved economic and social connectedness.

I would also like to draw your attention to a separate submission to be made on this matter by ATA member association, the Australian Livestock and Rural Transporters Association (ALRTA). ALRTA has a fundamental and expert interest in the transport of key commodities through the use of the most productive modular vehicle combinations available. In its submission, ALRTA provides detailed, constructive comments on the draft recommendations in the Strategy and the ATA urges you to consider ALRTA's recommendations carefully.

Simplified governance

The ATA is a longstanding supporter of the move towards one rulebook for the trucking industry through introduction of the Heavy Vehicle National Law (HVNL) in 2012. However, reform has proven to be a long process and despite achievements to date, trucking operators remain buried under mountains of guidelines, rules, regulations, laws and varying legal regimes which collectively choke national road transport productivity.

Industry's criticism of a piecemeal regulatory environment does not amount to a demand for no state intervention. It simply restates the ATA's clarion call for fewer, better operating rules under one, less costly mode of governance for a priceless economic activity on which the entire nation depends. A reputation for over-regulation in this important industry also sends entirely the wrong signal to potential market entrants at a time when deep, underlying growth is most needed.

The ATA has proposed a variety of transport reforms that would dramatically streamline HVNL legislation and bring it into line with best practice in safety regulation. These reforms are being considered through the NTC chain of responsibility duties review.

Longstanding access concerns include access for freight vehicles such as B-doubles and road trains, access for PBS-approved truck and trailer combinations on B-double routes; and policy failures to reconsider axle mass limits, use of ultra-wide single tyres or even European vehicle width standards for safely increasing payloads.

With respect to vehicle standards, Australia's prescriptive 2.5 metre width rule conflicts with the 2.55 m standard in the European market and with 2.591 m (102") in the USA. The ATA has also been very clear with the authorities that PBS access permits are decided and issued too slowly, and that many local councils need to review the efficiency of their administrative processes as well as their interactions with the national regulator in order to expedite the national freight task to the widest extent possible.

Road funding for Remote and Regional Australia

The ATA seeks clear, strategic recognition from decision-makers that traditional funding and budgeting approaches for the supply and maintenance of country roads do not and cannot meet the needs of many people and businesses.

The challenge facing rural Australia (and our associated export trade) is to make domestic agriculture businesses more productive and commercially viable. This will not happen without the presence of reasonable road infrastructure because air services cannot fill the gap in freight delivery. It may also not happen without alleviating the large economic burden placed on local government areas for road upkeep and other costly municipal infrastructure.

Therefore the ATA makes the following recommendation:

That the Actions proposed in Strategic Areas, Transport Infrastructure and Transport Regulation, be implemented because they present a logical approach to increasing the productivity and economic possibilities for infrastructure in remote and regional areas.

The ATA would also like to be consulted on the implementation of any action items relevant to the heavy vehicle transport industry.

The ATA contact for this matter is Bill McKinley, National Manager, Government Relations and Policy, on 02 6253 6921 or bill.mckinley@truck.net.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Melham', written in a cursive style.

Christopher Melham
Chief Executive

31 July 2015