

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 [Link](#): and attached below) are intrinsically involved across the Australian grain supply chain—including grain receipt/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 [GTA Transport Code of Practice](#), 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,

Pat O'Shannassy
CEO, Grain Trade Australia

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	A3	Cargill Australia	Zsolt Kocza	www.cargill.com.au	
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			8		
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TRC International	Yohan Goonetilleke	www.trcglobal.com.my
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			105	
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			4	
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			14	
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		Priag Marketing Pty Limited	Kevin Schwager	www.priag.com.au
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		42	
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