

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 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 [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



Membership List as of 25 November 2025

Member Type	Member Level	Account Name	Primary Contact	Website
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		CBH Group	Ben Macnamara	www.cbh.com.au
		GrainCorp Australia	Robert Spurway	www.graincorp.com.au
	A3		3	
		Cargill Australia	Zsolt Kocza	www.cargill.com.au
	A4		1	
		ADM Trading Australia	Darryl Borlase	www.adm.com
		Louis Dreyfus Company	David Johnson	www.ldc.com
	B1		2	
		Arrow Commodities	Dom Vanzella	www.arrowcom.com.au
		Australian Grain Export Pty Ltd	Tim Martin	www.australiangrainexport.com.au
		CHS Broadbent	Steve Broadbent	www.broadbentgrain.com.au
		George Weston Foods	Michael Schmidt	www.gwf.com.au
		Manildra Group	Peter Sloan	www.manildra.com.au
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		Inghams Enterprise Pty Ltd	Matt Clarke	www.inghams.com.au
		J K International Pty Ltd	Sandeep Mohan	www.jki.com.au
	B3	Ridley Agriproducts	Reagan Stroud	www.agriproducts.com.au
		Riverina (Australia)	Jon Mulally	www.riverina.com.au
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		Allied Pinnacle	Brett Duzmal	www.alliedmills.com.au
		Brahman Commodities	Michael Aikman	www.brahmancommodities.com.au
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		K M & W M Kelly & Sons	Matt Kelly	www.kellygrains.com.au
		Quadra Commodities	Robin Cassar	www.quadra.com
		Qube Logistics (SB) Pty Ltd (T/A Qube Agri)	Jeremy Brown	www.qube.com.au
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		Associated Grain T/A Agrocorp Processing Australia	Russell Darbey	www.agrocorp.com.au
		Australian Food & Fibre Processing	Peter Webb	www.australianfoodandfibre.com.au
		Australian Fresh Milk Holdings (AFMH)	Jill Smith	www.afmh.com.au
		BFB Pty Ltd	Shane Bird	www.bfb.com.au
		Blairs Produce Company	Sean Blair	crt.com.au/store/blairs-produce-company/
		Boolah Farms Pty Ltd	Stuart Tighe	www.boolah.com.au
		Castlegate James Australasia Pty Ltd	Kevin O'Brien	www.castlegatejames.com.au
		COPRICE	Kirsty Cutter	www.coprice.com.au
		Darwalla Milling Co Pty Ltd	Gary Heidenreich	www.darwalla.com.au
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		Fodder Link Pty Ltd	Cameron Angel	www.fodderlink.com.au
		Hanlon Enterprises	Chris Coates	www.hanlonenterprises.com.au
		Hazeldenes Chicken Farm	Marcus Dingle	www.hazeldenes.com.au
		IGH Commodities	Brad Bryant	www.igh.net.au
		Inari Australia	Karan Singh	www.inariaustralia.com.au
		Irwin Stockfeeds	Bryan Irwin	www.irwinstockfeeds.com.au
		Itochu Australia Ltd	Nick Poutney	www.itochu.com.au
		JBS Pork Australia Pty Ltd	Andrew Philpotts	www.rivalea.com.au
		Jerilderie Grain Storage & Handling	Tyler Caddy	www.jgsh.com.au
		Laucke Flour Mills Pty Ltd	David Harris	www.laucke.com.au
		Lawson Grains	John Marshall	www.lawsongrains.com
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		Malteurop Australia Pty Ltd	Eric Fisher	www.malteurop.com/en/australia
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		MSM Milling Pty Ltd	Peter MacSmith	www.msmmilling.com.au
		Namoi Cotton Ltd	Nathan Hunter	www.namoičotton.com.au
		Pentarch Agricultural Pty Ltd	Simon Yuncken	www.pentarch.com.au
		Premium Grain Handlers Pty Ltd	John Orr	www.pgh.com.au
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		Reid Stockfeeds Pty Ltd	Ian Reid	www.reidstockfeeds.com.au
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QS Commodities Pty Ltd	Nick Slipper	www.qscommodities.com
RP Grain Pty Ltd	Gordon Pulham	randpcarriers.com.au/r-p-grains
Rural Logic (Aust) Pty Ltd	Michael Wood	www.rurallogic.com.au
Shannon Bros Bulk Storage Pty Ltd	Clayton Shannon	www.shannonbros.com.au
Silo Bag Grain (NSW QLD) Pty Ltd	Lesley Kilby	www.silobaggrain.com.au
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Sun Euro Australia	Tarun Saxena	www.suneuro.com.au
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Tasman Agri	Stuart Clarke	https://www.tasmanagri.com.au/
TRC International	Yohan Goonetilleke	www.trcglobal.com.my
Trentham Grazing Pty Ltd T/A Godde's Grain & Fertiliser Pty Ltd	Barry Fisher	www.goddesgrainandfertiliser.com.au
Ulupna Pastoral Co Pty Ltd	Carly-Lee Perkins	www.ulupna.com.au
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Universal Commodity Management	Tim Dean	www.commoditymanagement.com.au

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Transport Operator		Crawfords Freightlines Pty Ltd	Phillip Davis	www.crawfordsfreightlines.com.au
		Gehrke Grains & Transport Pty Ltd	Julian Gehrke	www.gehrke.com.au
		Pacific National (NSW) Pty Ltd	Paul Scurrah	www.pacificnational.com.au
		SEAWAY Intermodal Pty Ltd	Bikash Ram	www.seawayintermodal.com.au
				4
Broker	Medium	Fox Commodities Pty Ltd	Paul Cochrane	www.foxcommodities.com.au
		Grain Brokers Australia	Jeff Winspear	www.grainbrokers.com.au
		Horizon Grain Brokers Pty Ltd	Ash Munro	www.horizongb.com.au
		ICAP Futures (Australia)	Brett Cooper	www.tpicap.com
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		Quest Commodities	Jayne Barker	www.questcommodities.com.au
		Rain Agribusiness	Ian Grellman	www.rainag.com.au
		StoneX Financial	Stefan Meyer	www.intlfcstone.com
		Teague Australia Pty Ltd	Tim Teague	www.teague.com.au
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Sole Operator	Sole Operator	A C Grain	Adam Clarke	www.acgrain.com
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		Lotema Pty Ltd	Todd Lees	www.lotema.com.au
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		Wardi Broking	Sam Ward	www.wardi.com.au
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				11
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		BoortMalt Asia Pacific Pty Ltd	Simon Robertson	www.boortmalt.com
		CIS Control Union Australia	Ashok Rana	www.cis-controlunion.com
		Commonwealth Bank of Australia	Tom Morgan	www.commbank.com.au
		NSW Ports (Port Kembla Unit Trust)	Joshua Lawrence	www.nswports.com.au
		Regulator Markets	Angus Knight	www.regulatormarkets.com
		Sanitarium Health Food Company	Nathan Bullock	www.sanitarium.com.au
		Symbio Laboratories	Kristian Just	www.symbiolabs.com.au
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	Medium	AgriFood Technology	Doreen Fernandez	www.agrifood.com.au
		Amspec Australia	Lee Shilvock	www.amspecgroup.com.au
		Australian Superintendence Company (ASC)	Andrew Parry	www.austsupco.com.au
		Clear Grain Exchange	Nathan Cattle	www.cleargrain.com.au
		Foss Pacific	Karl Hansal	www.foss.com.au
		HFW Australia	Stephen Thompson	www.hfw.com
		Holding Redlich	Geoff Farnsworth	www.holdingredlich.com
		Intertek	Debrah Millard	www.intertek.com
		Mars Petcare Australia (T/A Mars Birdcare)	Kurt Sosinski	www.mars.com.au
		Oldendorff Carriers Melbourne	Allen Dewhurst	www.oldendorff.com
		PSC Griffith Goodall Insurance Brokers	Mandy Gladman	www.pscgib.com.au
	Small	SBA Law	Jeremy Rosenthal	www.sbalaw.com
		SGS Australia	Trent Charlton-Maughan	www.au.sgs.com
		T-Ports	Nathan Kent	www.tports.com
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		Advance Trading Australia	Andrew Woodhouse	www.advance-trading.com.au
		AgriDigital	Emma Weston	www.agridigital.io
		Ag Scientia	Lloyd George	www.agscientia.com.au
		AgVise (WA) Pty Ltd	Shane Sander	www.agvise.com.au
		Aperture Ag Pty Ltd	Alex Campbell	www.apertureag.com.au
		Basis Commodities	Chris Whitwell	www.basiscommodities.com
		BSM Global	Jason Flemming	www.buyseilmove.com
		Cloudbreak Grain Marketing	Ed Scamps	www.cloudbreak.com.au
		Cropify	Anna Falkiner	www.cropify.io
		Delta Agribusiness	Michael Parry	www.deltaag.com.au
		E P Integrated Commodities	Tracey Lehmann	epicbrokers.biz
		Farmanco Marketing Pty Ltd	Donald McTaggart	www.farmanco.com.au
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		Futari Grain Technology Services	Leah Petrie	www.futari.com.au
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		Grainx	Judi Morgan	www.grainx.com.au
		Greenoaks Agriculture Pty Ltd	Richard Perkins	www.greenoaksag.com.au
		Harvestcheck Pty Ltd	Stephen Schumacher	www.harvestcheck.com.au
		Hay Plains Grain Storage Pty Ltd	Ron Harris	www.fellowsbulk.com.au/grainstorage
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		MarketAg Pty Ltd	Mark Martin	www.marketag.com.au
		McMullen Consulting	Gerard McMullen	www.mcmullengrainagricultural.com
		National Grower Register	Debbie Newmarch	www.ngr.com.au
		OMIC Australia Pty Ltd	Koji Nakashima	www.omicaustralia.com.au
		Perten Instruments	Raul Ovelar	www.perten.com
		Pinion Advisory	Chris Heinjus	www.pinionadvisory.com
		Planfarm Marketing Pty Ltd	Jerome Critch	www.planfarm.com.au
		Priag Marketing Pty Limited	Kevin Schwager	www.priag.com.au
		Profarmer and Australian Crop Forecasters	Rod Baker	www.nzx.com

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	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
		1	
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	Stock Feed Manufacturers' Council of Australia (SFMCA)	Ellen Buckle	www.sfmca.com.au
		5	
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		4	