1. Executive Summary

1.1 About ALRTA

The Australian Livestock and Rural Transporters Association (ALRTA) is the national peak body for livestock and rural road freight operators. Our members keep regional supply chains moving—linking farms, processors, saleyards and ports.

1.2 Core thesis

Australia's productivity problem is not abstract. It shows up as wasted hours, idle capital and missed windows. Freight is where those losses become real. Recent global and domestic disruptions have destabilised the container freight supply chain, contributing to congestion, delays and higher costs for businesses and consumers.[1] That matters because freight friction is an economy-wide cost, not a trucking problem. Remove the friction and you lift output per hour across the chain. You also unlock investment. When compliance infrastructure is available where it's needed and regulatory compliance is reusable, operators back safer, more productive equipment and better systems. That is capital deepening in practice. Complementary tax settings can accelerate that capital deepening—particularly certainty in Fuel Tax Credits and investment write-off settings that bring forward fleet and compliance equipment upgrades.[2]

1.3 The three major productivity reforms

Reform 1 — National washdown and managed effluent disposal network (corridor compliance infrastructure)

Make lawful biosecurity and hygiene compliance predictable, not a trip-stopper. Co-fund priority corridor and hub facilities, publish a single national register, and remove the detour and queue time tax that turns compliance into lost freight hours.

Reform 2 — Harmonised, digitised regulation to cut compliance deadweight

Stop making operators re-prove the same facts, in different formats, to different agencies. Keep safety. Cut duplication.

Reform 3 — Workforce mobility and resilience settings for regional freight continuity

Make skills portable, speed up conversion, and keep essential freight moving through shocks.

---

[1] Australian Competition and Consumer Commission (ACCC) 2024, *Disruptions and price rises persist in the container freight supply chain* (media release, 20 December), ACCC, https://www.accc.gov.au/media-release/disruptions-and-price-rises-persist-in-the-container-freight-supply-chain, viewed 18 February 2026.

[2] business.gov.au (n.d.), *Claim fuel tax credits*, Australian Government, viewed 18 February 2026, https://business.gov.au/finance/tax/claim-fuel-tax-credits; Federal Register of Legislation 2006, *Fuel Tax Act 2006*, Australian Government, viewed 18 February 2026, https://www.legislation.gov.au/Series/C2006A00009.

1.4 How success will be measured

Within 12 months, governments should publish a baseline and targets, then publish quarterly scorecard updates, backed by an annual review.

1. Washdown/effluent coverage: share of priority corridors and freight hubs with compliant washdown and lawful effluent disposal available within a practical distance/time threshold.
2. Compliance time tax: detour minutes and queue time required to comply (median and 90th percentile) on priority routes/nodes.
3. Facility availability: operating hours/uptime and practical access (including during peak seasonal demand and surge events).
4. **Compliance admin burden**: hours per operator per year (survey-based), segmented by fleet size.
5. **Duplicate audit / duplicate evidence rate**: share of compliance activity covering equivalent controls already accepted elsewhere.
6. **Workforce conversion time**: days from entry to verified competence, plus RPL processing time.
7. **Disruption recovery time** for essential regional freight: time to restore safe, reliable throughput after major events.

2. Why freight is a national productivity lever

The Committee's discussion paper points to three drags on productivity: weak capital deepening, rising regulatory burden, and labour market frictions.[3] It also flags freight supply chains, where disruption and fragmented settings raise costs and suppress output. Freight is high-leverage because those drags hit in real time: delay, variability, and duplicated processes.

2.1 Freight is not a "transport issue" — it is system productivity

Freight is the economy's connective tissue. It links regional producers to processors, processors to ports, inputs to factories, and essentials to households. When that system is slow, uncertain, or administratively fragmented, the cost does not sit neatly inside "the transport sector" — it shows up as higher economy-wide costs, lower output per hour, and weaker competitiveness.

Freight is a productivity lever for two reasons.

First, the scale is enormous. In 2024–25, Australia's road freight task was around 253 billion tonne-kilometres, and rail freight around 447 billion tonne-kilometres — before considering coastal

[3] Senate Select Committee on Productivity in Australia n.d., *Productivity in Australia: Discussion paper*, Parliament of Australia, https://www.aph.gov.au/-/media/Committees/Productivity_in_Australia/Productivity-Discussion-paper.pdf, viewed 18 February 2026.

shipping and air freight.[4] At that scale, small gains compound. Minutes matter. Variability matters. Avoidable detours matter.

Second, freight is big enough to move the dial. The Australian Government estimates the freight and logistics sector accounts for approximately 8.6% of GDP.[5] So a "modest" lift in freight productivity is not modest in impact. It flows into the cost base of almost every industry.

Freight is a general-purpose enabler. It shrinks the penalty of distance, lifts utilisation, and keeps supply chains functioning when shocks hit. The Committee should treat freight reform as system productivity—practical change with measurable upside.

2.2 Defining "structural friction" — the hidden tax on output

ALRTA uses structural friction to describe the system features that make freight slower, less predictable, and more expensive than it needs to be—even when operators are efficient and doing everything right.

It is not one problem. It is an accumulation of time taxes, uncertainty taxes, and transaction costs that compound across supply chains, including:

1. Delay and variability. Reliability often matters more than raw speed. When lead times swing, firms carry buffer inventory, extra working capital, and slack labour to cope—and productivity falls. International logistics research is blunt on the point: variability is a productivity killer because it forces the whole chain to build in waste as insurance.[6]
2. Missing compliance infrastructure (the compliance time tax). Where essential compliance infrastructure is patchy or unavailable—particularly washdown and lawful managed effluent disposal—compliance becomes downtime: detours, queues, missed booking windows, and idle assets. This is not "operator inefficiency"; it is a system design failure that turns lawful compliance into lost freight hours.
3. Duplicated and inconsistent compliance processes. Where the same or similar evidence must be re-provided in different formats, to different agencies, under different interpretations, time is diverted from productive work into administration. Safety can be maintained while duplication is stripped out through harmonisation, digitisation, and "once-only" approaches.[7]
4. Workforce mobility and surge constraints. In regional freight, the labour pool is thin and disruptions hit hardest. Friction in licensing, recognition of prior learning, cross-border rules

---

[4] Bureau of Infrastructure and Transport Research Economics (BITRE) 2025, *Australian Infrastructure and Transport Statistics Yearbook 2025: Freight* (webpage), Australian Government, https://www.bitre.gov.au/publications/2025/australian-infrastructure-and-transport-statistics-yearbook-2025/freight, viewed 18 February 2026.

[5] Department of Infrastructure, Transport, Regional Development, Communications and the Arts n.d., *Freight and supply chains* (webpage), Australian Government, https://www.infrastructure.gov.au/infrastructure-transport-vehicles/transport-strategy/freight-and-supply-chains, viewed 18 February 2026.

[6] Hummels, D & Schaur, G 2013, 'Time as a trade barrier', *American Economic Review*, vol. 103, no. 7, pp. 2935–2959, https://doi.org/10.1257/aer.103.7.2935, viewed 18 February 2026; Sheffi, Y 2007, *The resilient enterprise: overcoming vulnerability for competitive advantage*, MIT Press (selected excerpts available at https://dspace.mit.edu/handle/1721.1/52330), viewed 18 February 2026.

[7] Infrastructure Australia 2019, *Australian Infrastructure Audit 2019: Freight*, Infrastructure Australia, viewed 18 February 2026, https://www.infrastructureaustralia.gov.au/sites/default/files/2020-09/audit_freight.pdf; Department of Infrastructure, Transport, Regional Development, Communications and the Arts (n.d.), *Heavy vehicle regulation*, Australian Government, viewed 18 February 2026, https://www.infrastructure.gov.au/infrastructure-transport-vehicles/roads/heavy-vehicle-regulation; Department of Infrastructure, Regional Development and Cities 2018, *Review of Oversize Overmass (OSOM) Access Arrangements (Final Report)*, Australian Government, viewed 18 February 2026, https://www.infrastructure.gov.au/sites/default/files/migrated/vehicles/vehicle_regulation/files/Oversize_Overmass_review_September_2018_FINAL_REPORT_sans_appendices.pdf.

and inconsistent competency pathways slows recruitment, delays conversion, and weakens the system's ability to surge during seasonal peaks or shocks.

Structural friction is a hidden tax. It makes Australia use more hours, more capital, and more vehicles to move the same freight. It concentrates in three places the Committee can help fix: (1) compliance infrastructure gaps (washdown/managed disposal), (2) duplicated regulation and compliance, and (3) workforce mobility and resilience.

2.3 The investment link — compliance infrastructure unlocks capital deepening

Productivity lifts when workers have better capital to work with. The Committee rightly points to investment and capital deepening as central drivers of productivity, and notes that slower capital deepening has likely weighed on Australia's performance.[8] The Reserve Bank makes the same point: more capital per worker usually means more output per hour.[9] Treasury's own productivity overview notes that capital deepening has delivered almost half of Australia's productivity growth since Federation.[10]

In livestock and bulk agricultural freight, capital deepening is not abstract. It is the fleet. It is specialised equipment. It is compliance-ready fit-outs. But the business case only holds when the task flows. When lawful washdown and effluent disposal are missing, the network forces detours, queues and downtime. Utilisation falls. Costs rise. Investment gets delayed or scaled back.

That is why Reform 1 is a productivity reform. A washdown and managed effluent disposal network turns hygiene into a predictable step, not a trip-stopper. It cuts dead running. It shortens turnaround. It reduces compliance risk. That makes returns on fleet upgrades and better operating systems more predictable—and lifts capital deepening where it matters: on the road, in regional supply chains. In practice, two tax levers influence whether that investment happens. Fuel Tax Credits reduce the effective fuel-tax cost embedded in eligible business fuel use, which matters in high-fuel, high-kilometre tasks. And accelerated depreciation measures (including the instant asset write-off for eligible small businesses) improve cash flow and can bring forward investment in safer, more efficient fleet upgrades and compliance equipment.[11] These levers do not replace structural reform—but they can keep investment moving while the system fixes the friction.

Governments already recognise this logic. Tasmania is investing $2 million over four years to improve washdown infrastructure, explicitly linking facilities to biosecurity, hygiene and better amenity outcomes.[12] A Biosecurity Tasmania-commissioned strategic review also found unmet demand for

---

[8] Senate Select Committee on Productivity in Australia n.d., *Productivity in Australia: Discussion paper*, Parliament of Australia, https://www.aph.gov.au/-/media/Committees/Productivity_in_Australia/Productivity-Discussion-paper.pdf, viewed 18 February 2026.

[9] Hambur, J & Andrews, D 2023, *Doing Less, with Less: Capital Misallocation, Investment and the Productivity Slowdown in Australia*, Research Discussion Paper RDP 2023-03, Reserve Bank of Australia, March, viewed 18 February 2026, https://www.rba.gov.au/publications/rdp/2023/2023-03/

[10] The Treasury 2025, *Productivity* (Economic Reform Roundtable—Productivity overview) (PDF), Commonwealth of Australia, viewed 18 February 2026, https://treasury.gov.au/sites/default/files/2025-08/productivity-overview.pdf

[11] business.gov.au (n.d.), *Instant Asset Write-Off*, Australian Government, viewed 18 February 2026, https://business.gov.au/grants-and-programs/instant-asset-writeoff; Department of Finance 2025, *FOI 25-26/144 Document 07* (brief referencing 2025 PEFO), viewed 18 February 2026, https://www.finance.gov.au/sites/default/files/foi-25-26-144-document-07.pdf; The Treasury 2020, *Fact sheet: Delivering support for business investment*, Australian Government, viewed 18 February 2026, https://treasury.gov.au/sites/default/files/2020-03/Fact_sheet-Support_for_business_investment.pdf.

[12] Department of Natural Resources and Environment Tasmania 2024, *Agricultural Hygiene Washdown Infrastructure*, last published 19 April 2024, viewed 18 February 2026, https://nre.tas.gov.au/biosecurity-tasmania/biosecurity/agricultural-hygiene-washdown-infrastructure

publicly accessible washdown infrastructure and identified the lack of effluent dump sites as a problem, with stakeholders viewing effluent dump sites as a necessary part of an integrated washdown network.[13]

3. Reform 1 — Build the missing compliance infrastructure: washdown and managed effluent disposal for livestock and bulk agricultural freight

This reform removes an avoidable drag on regional freight: time lost to detours and delays when washdown and lawful effluent disposal are missing.

This is basic freight infrastructure. Without it, the system runs slower and riskier. The Committee is asking what practical infrastructure and resilience settings reduce disruption costs and lift economy-wide productivity.

3.1 The productivity problem

Livestock freight carries hygiene with it. It is not optional. You cannot digitise it away.

Trucks must be able to do three basic things on route and near major nodes:

- Wash down between loads and dispose of washwater/effluent safely and lawfully.
- Empty on-board effluent tanks at a lawful disposal point.
- Meet biosecurity, environmental, work health and safety (WHS) and animal welfare duties without detours or ad hoc workarounds.[14]

When the infrastructure is missing, the system pays three times.

1. First, it loses time: extra kilometres, queues and downtime just to find a compliant facility.
2. Second, risk rises: compliance becomes fragile when lawful options are patchy or absent.
3. Third, shocks bite harder: in an animal disease event, decontamination and waste control become system-critical.[15] [16]

---

[13] Murphy, P, Statham, A & Tyler, J 2016, *Strategic review of truck wash facilities in Tasmania: final report*, Department of Primary Industries, Parks, Water and Environment (Tasmania), https://nre.tas.gov.au/Documents/Final%20report%20for%20the%20strategic%20review%20of%20truck%20wash%20facilities%20in%20Tasmania.pdf, viewed 18 February 2026.

[14] ACIL Allen Consulting & GHD 2024, *Biosecurity Truck Wash Facilities for SA Livestock Transhipping Hubs: Preliminary Business Case* (PDF), report commissioned by Livestock SA Inc. and Department of Primary Industries and Regions South Australia (PIRSA), 31 July, viewed 18 February 2026, https://livestocksa.com.au/assets/lsa/documents/SA-Truck-Wash-Facility-Preliminary-Business-Case-31July24.pdf

[15] Safe Work Australia n.d., *Model WHS laws*, Australian Government, https://www.safeworkaustralia.gov.au/law-and-regulation/model-whs-laws, viewed 18 February 2026; Animal Health Australia 2012, *Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock*, Australian Government (DAFF hosting), https://www.agriculture.gov.au/sites/default/files/documents/australian-animal-welfare-standards-and-guidelines-land-transport-of-livestock.pdf, viewed 18 February 2026.

[16] Animal Health Australia 2021, *Operational manual: Disposal* (version 5.0), *Australian Veterinary Emergency Plan (AUSVETPLAN)*, edition 5, Canberra, viewed 18 February 2026, https://animalhealthaustralia.com.au/wp-content/uploads/dlm_uploads/2021/12/AUSVETPLAN-_Operational_Disposal_Manual.pdf

Governments already treat this as real infrastructure. Biosecurity Tasmania notes that on-board effluent tanks can fill quickly, and gaps between wash sites raise spill and dumping risk.[17] A strategic review of truck washes in Tasmania found a consistent pattern: no managed disposal, inconsistent effluent handling, and some sites using infrastructure not designed for heavy vehicles.

3.2 What the Committee should recommend

Committee Recommendation 1: Establish a National Washdown and Managed Effluent Disposal Network for livestock and bulk agricultural freight, focused on priority corridors and high-throughput hubs and designed with states, local government and industry.

Component A — Build where the time tax is highest

Co-fund new builds and upgrades at high-throughput hubs (saleyards, feedlots, processors) and on the corridors that connect them. Put facilities where freight actually stops, not where funding is easiest.[18] [19]

Component B — Set a minimum, practical national standard

Set a baseline that can be delivered locally: a contained washdown pad, managed capture and storage, contracted lawful disposal, clear access controls, and operating hours that match the task.[20]

Component C — Fix eligibility settings that block delivery

Some Commonwealth guidance treats washdown and effluent disposal as freight infrastructure. Other guidance treats truck wash and stand-alone effluent disposal as ineligible. That mismatch blocks the most practical delivery model: integrated corridor compliance nodes at existing stopping points.[21]

The Committee should recommend a clear eligibility fix so integrated washdown and managed disposal is fundable where it is integral to lawful operations and community amenity.

Component D — One source of truth: find, book, comply

Create a national register of facilities—location, hours, capability and any booking rules. No new regulator. Just one source of truth so operators can plan and comply, and governments can see the gaps.

---

[17] Murphy, P, Statham, A & Tyler, J 2016, *Strategic review of truck wash facilities in Tasmania: final report*, Department of Primary Industries, Parks, Water and Environment (Tasmania), https://nre.tas.gov.au/Documents/Final%20report%20for%20the%20strategic%20review%20of%20truck%20wash%20facilities%20in%20Tasmania.pdf, viewed 18 February 2026.

[18] ACIL Allen & GHD 2024, *Truck wash facilities for SA livestock transhipping hubs: preliminary business case* (final report, 31 July), Livestock SA, https://www.livestocksa.com.au/wp-content/uploads/2024/09/ACIL_Truck-Wash-Preliminary-Business-Case_Final-Report.pdf, viewed 18 February 2026.

[19] Standards Australia 2020, *AS 5340:2020 Livestock loading ramps*, Standards Australia (catalogue entry via Intertek Inform), https://www.intertekinform.com/en-au/standards/as-5340-2020-1201425_saig_as_as_2899406/, viewed 18 February 2026.

[20] Livestock SA & PIRSA (ACIL Allen with GHD), *Biosecurity Truck Wash Facilities for SA Livestock Transhipping Hubs — Preliminary Business Case* (principles, requirements, viability findings, and recommendations including co-financing a pilot). (Livestock SA)

[21] Department of Infrastructure, Transport, Regional Development, Communications and the Arts 2024, *Safer Local Roads and Infrastructure Program: Heavy Vehicle Rest Areas Stream – Grant opportunity guidelines (GO7031)*, Australian Government, https://investment.infrastructure.gov.au/sites/default/files/2024-02/go7031_slrip_hvra_grant_opportunity_guidelines.pdf, viewed 18 February 2026; Transport for NSW 2017, *Fixing Country Truck Washes program overview*, NSW Government, https://www.transport.nsw.gov.au/system/files/media/documents/2020/fixing_country_truck_washes_program_overview.pdf, viewed 18 February 2026.

Component E — De-risk delivery with a circular-economy pathway (CRC-P-ready)

Where feasible, washdown and effluent nodes should be designed to *treat transport biowaste as a resource, not a liability*. Circular-economy options—such as contained capture with beneficial reuse pathways, composting, or anaerobic digestion—can improve whole-of-life viability and community acceptance.[22] ALRTA is developing a Cooperative Research Centres Programme—Projects (CRC-P) collaboration to map washout "hotspots", model site options, and produce a decision-support tool and staged investment roadmap governments can use to roll out a national network quickly and efficiently.

3.3 Why this lifts productivity

This reform lifts productivity in three direct ways:

- It cuts disruption costs by reducing detours, downtime and spill-related clean-ups.
- It turns compliance from a paper standard into a practical standard. Enforcement cannot substitute for physical capacity.
- It strengthens resilience. ABARES has estimated the economic impact of a large multi-state foot-and-mouth disease outbreak at around $80 billion over 10 years (present value).[23] Hygiene infrastructure is a low-regret investment in that risk profile.

3.4 Governance and roles

- **Commonwealth:** set the baseline, fix eligibility, co-fund priority sites, and publish performance data (coverage, utilisation, uptime).
- **States/territories:** deliver and regulate within existing biosecurity and environmental frameworks, with clear approvals pathways.
- **Local government and facility owners:** operate, maintain uptime, and manage waste streams, with user-pays where appropriate.

---

[22] Department of Climate Change, Energy, the Environment and Water 2024, *Australia's Circular Economy Framework*, Australian Government, viewed 18 February 2026, https://www.dcceew.gov.au/sites/default/files/documents/australias-circular-economy-framework.pdf; Productivity Commission 2025, *Australia's circular economy: unlocking the opportunities*, Productivity Commission, viewed 18 February 2026, https://www.pc.gov.au/inquiries/completed/circular-economy/report; NSW Environment Protection Authority (n.d.), *Managing odour*, NSW Government, viewed 18 February 2026, https://www.epa.nsw.gov.au/your-environment/air/odour/managing-odour; Department of Environment and Science (Queensland) 2021, *Composting – using controlled biological processes to improve waste management and resource recovery*, Queensland Government, viewed 18 February 2026, https://www.business.qld.gov.au/__data/assets/pdf_file/0014/265271/composting.pdf.

[23] Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) 2022, 'Direct economic impacts of a foot-and-mouth disease (FMD) incursion in Australia: an update of ABARES 2013 estimate', Department of Agriculture, Fisheries and Forestry, page last updated 22 July 2022, viewed 18 February 2026, https://www.agriculture.gov.au/abares/research-topics/biosecurity/biosecurity-economics/fmd-update-of-2013-estimate

4. Reform 2 — Cut regulatory deadweight with harmonisation and digital compliance

4.1 The Committee's regulatory burden lens

The discussion paper is clear: regulation is essential, but it can also stymie productivity. It points to evidence that Commonwealth regulatory complexity is imposing large and rising compliance costs. It asks which requirements impose the greatest burden—and how to streamline them without compromising safety or the public interest.[24]

In freight, compliance is not a one-off task. It is recurring, time-sensitive, and too often duplicated across jurisdictions, schemes and portals.[25]

4.2 What the Committee should recommend

Committee Recommendation 2: A National "Once-only and Digital" Freight Compliance Reform Package

The Committee should recommend a nationally agreed package that makes freight compliance harmonised and reusable—so operators and regulators stop re-proving the same facts in different formats.

Component A — "Once-only" evidence and mutual recognition for equivalent assurance controls

Set a national rule: if an operator has already demonstrated an equivalent control, regulators should accept that evidence once and reuse it. Allow exceptions only where a clear risk trigger exists (for example, an incident history, a material change, or non-conformance).

This is not theoretical: the Productivity Commission has identified duplicative audits across multiple schemes, including repeated provision of similar information in different formats.[26]

Component B — National data standards for freight compliance (a common dictionary and reusable fields)

Create a nationally consistent "freight compliance data standard" (operator, vehicle, accreditation, audit outcomes, nominated controls) so businesses aren't re-keying and re-formatting data for each scheme or jurisdiction. This should include:

- a common data dictionary (definitions and required fields),
- interoperability requirements (APIs) so systems can exchange validated data, and
- a consistent approach to evidence retention, privacy, and consent.

---

[24] Senate Select Committee on Productivity in Australia, *Discussion paper*, section "Australia's regulatory burdens that limit productivity" (includes the Committee's questions on streamlining without compromising public interest or safety).
[25] Senate Select Committee on Productivity in Australia, *Discussion paper*, "Freight supply chains" (notes disruptions causing congestion/delays/higher costs and asks whether harmonised freight/logistics regulations would better support the economy).
[26] Productivity Commission 2020, *National Transport Regulatory Reform* (Inquiry Report No. 90), Productivity Commission, https://www.pc.gov.au/inquiries/completed/transport/report/transport.pdf, viewed 18 February 2026, pp. 268–271 (duplicative audits).

Component C — Audit interoperability and consistent expectations

Publish national guidance so audit expectations and evidence requirements are consistent across jurisdictions and schemes, and audit outputs are usable (with consent) across regulators. This fixes the problem of the same intent producing different audit expectations.

Component D — Digitised compliance "by default", with SME-scalable options

Digitisation must not become a compliance upgrade tax. It should be designed to scale down to small regional fleets through:

- simple templates and pre-approved system modules,
- tiered requirements proportionate to risk and fleet size, and
- offline-capable options so regional connectivity constraints don't exclude operators.

Small operators wear fixed compliance costs hardest.[27] Digital compliance must be designed to work for small regional fleets, not just the best-resourced businesses.

Component E — Performance transparency (regulation as a measurable productivity input)

Require public reporting of:

- duplicate audit incidence (how often an operator is audited for equivalent controls more than once),
- time-to-decision for key approvals/recognitions, and
- operator time/cost spent on compliance administration (measured via a standard survey instrument).

4.3 Why this lifts productivity without lowering safety

This reform lifts productivity by converting compliance from a repeated transaction cost into a reusable asset:

- Faster, more predictable decisions reduce delay variance and cut "dead time" waiting on approvals. That lowers friction and lifts investment confidence. The Productivity Commission notes that statutory timeframes do not always prevent long delays, and that penalties for missing timeframes may be weak or absent.[28]
- Safety is protected through risk-based escalation. It shifts resources from low-value duplication to higher-value targeting where non-compliance or elevated risk is detected.
- Governments are already moving toward "once-only" digital government and interoperable data sharing. Apply the same logic to compliance evidence and audit outputs.

---

[27] Douglas, J & Pejoska, J 2017, 'Regulation and small business', *Economic Roundup*, Issue 1, Australian Government Treasury, https://treasury.gov.au/publication/economic-roundup-issue-1-2017/regulation-and-small-business, viewed 18 February 2026.

[28] Productivity Commission 2020, *National Transport Regulatory Reform* (Inquiry Report No. 90), Productivity Commission, https://www.pc.gov.au/inquiries/completed/transport/report/transport.pdf, viewed 18 February 2026, p. 372 (no penalty for failure to meet statutory decision timeframes).

5. Reform 3 — Workforce mobility and resilience settings for regional freight continuity

This reform lifts labour productivity by cutting workforce friction—portability, recognition and onboarding time—and by reducing disruption costs through real surge capacity and continuity settings.

5.1 Labour market dynamism: why this is a productivity reform, not a "transport workforce" side issue

The Committee's discussion paper highlights labour market dynamism, and the drag created by licensing, skills recognition and portability barriers. Regional freight feels that drag immediately. Workforce constraints show up as unproductive capital. Trucks and trailers sit idle because drivers are scarce, onboarding is slow, recognition is inconsistent, and surge capacity is thin in peaks and emergencies.

This is not marginal. The freight task will grow, and workforce bottlenecks will bite harder.[29] As the freight task grows, any workforce bottleneck becomes a direct productivity constraint—raising unit costs, increasing delays/variability, and discouraging investment in more efficient equipment and systems.

5.2 The productivity problem: shortages, ageing, and high-friction onboarding

Driver availability and portability are now binding constraints. Jobs and Skills Australia's occupation shortage analysis shows Truck Drivers are among the largest employing unit groups in shortage—this is a scale problem.[30] Jobs and Skills Australia estimates 148,400 people are employed as Truck Drivers (General) and the median age is 48 (vs 40 across all occupations), which lifts replacement demand.[31] Bureau of Infrastructure, Transport and Regional Economics (BITRE) profiling points to the same ageing pattern.[32] [33]

At the same time, the shortage dynamics are not neatly characterised as 'long training gap' problems. Jobs and Skills Australia's Occupation Shortage Drivers analysis shows Truck Drivers are among the largest employing unit groups in shortage; in 2025 the shortage driver is assessed as uncertain (reflecting multiple drivers), whereas in 2024 it was assessed as a short training gap. So

---

[29] Bureau of Infrastructure and Transport Research Economics (BITRE) 2022, *Australian aggregate freight forecasts to 2050: 2022 update* (Report RR 154), Australian Government, https://www.bitre.gov.au/publications/2022/files/rr154.pdf, viewed 18 February 2026.
[30] Jobs and Skills Australia 2025, *Occupation shortage drivers report 2025*, Australian Government, https://www.jobsandskills.gov.au/reports/occupation-shortage-drivers-report-2025, viewed 18 February 2026.
[31] Jobs and Skills Australia 2025, *Truck Drivers (General): occupation profile*, Australian Government, https://www.jobsandskills.gov.au/data/occupation-shortages/occupation-profiles/truck-drivers-general, viewed 18 February 2026; Transport for NSW 2024, *Heavy vehicle driver pathways: behavioural and communications research report* (median-age comparison cited), NSW Government, https://www.transport.nsw.gov.au/system/files/media/documents/2024/heavy-vehicle-driver-pathways-behavioural-and-communications-research-report.pdf, viewed 18 February 2026.
[32] Jobs and Skills Australia n.d., 'Truck Drivers (General) (ANZSCO 733111)', Occupation and Industry Profiles, Australian Government, viewed 18 February 2026, https://www.jobsandskills.gov.au/data/occupation-and-industry-profiles/occupations/733111-truck-drivers-general.
[33] Bureau of Infrastructure, Transport and Regional Economics (BITRE) 2019, *Transport, postal and warehousing workers: 2016 Census* (Information Sheet 104), Australian Government, https://www.bitre.gov.au/publications/2019/files/is_104.pdf, viewed 18 February 2026.

policy should focus on faster conversion, consistent competence recognition, and retention—rather than assuming the answer is simply longer training pipelines.[34]

On the ground, operators see three productivity drains:

- **Slow conversion:** time to competence and time to employment is longer than it needs to be, because training expectations vary, assessment quality is uneven, and regional training access is thin.
- **Recognition friction:** workers with relevant experience face slow, inconsistent recognition pathways, which blocks mobility to where demand is highest.
- **Thin surge capacity:** during floods, bushfires, animal health incidents or seasonal peaks, the system lacks a fast, trusted way to redeploy credentialled people across regions without rework.

5.3 What the Committee should recommend

Committee Recommendation 3 — Establish a National Freight Workforce Mobility and Resilience Package, built around portable competence and rapid redeployment.

The Committee should recommend that the Commonwealth, working with states and territories through National Cabinet, adopt a package with three integrated components:

Component A — Make freight skills genuinely portable

Australia already has an emerging national foundation to do this: Austroads' National Heavy Vehicle Driver Competency Framework (NHVDCF). Austroads has stated that the updated NHVDCF rollout begins in 2026, supporting more consistent training and assessment and helping create clearer pathways and mobility for heavy vehicle drivers.[35] The accompanying Decision regulatory impact statement (RIS) frames the reform as setting consistent minimum competence expectations and improving consistency across jurisdictions.[36]

The Committee should recommend:

1. Accelerate and fully implement NHVDCF nationally (all jurisdictions, not a patchwork), including transparent milestones and public reporting of implementation progress.
2. Create a digital "Freight Skills Passport" aligned to NHVDCF (licence class, verified competencies and endorsements), so employers and regulators can trust and rapidly verify capability without duplicative re-proving. This is a productivity reform because it reduces onboarding time and increases cross-regional matching.

---

[34] Jobs and Skills Australia 2024, *Occupation shortage drivers report 2024*, Australian Government, https://www.jobsandskills.gov.au/reports/occupation-shortage-drivers-report-2024, viewed 18 February 2026; Jobs and Skills Australia 2025, *Occupation shortage drivers report 2025*, Australian Government, https://www.jobsandskills.gov.au/reports/occupation-shortage-drivers-report-2025, viewed 18 February 2026.

[35] Office of Impact Analysis 2024, *National Heavy Vehicle Driver Competency Framework* (impact analysis), Australian Government, https://oia.pmc.gov.au/obpr/issues-impact-analysis/ii02559, viewed 18 February 2026.

[36] National Transport Commission 2024, *Decision RIS – Heavy vehicle driver competency* (August), NTC, https://www.ntc.gov.au/sites/default/files/assets/files/NTC%20Decision%20RIS%20-%20Heavy%20vehicle%20driver%20competency%20-%20August%202024.pdf, viewed 18 February 2026.

3. Standardise recognition of prior learning (RPL) evidence requirements and timeframes, so the same evidence set is accepted nationally for defined competencies. RPL is a direct pathway to faster labour mobility within the vocational education and training (VET) system—and it should be used properly.[37]

Component B — Build a regional workforce pipeline that matches the settlement strategy

The discussion paper explicitly links regional growth to constraints such as skilled worker retention and training infrastructure.[38] Freight is an enabling system for regional economies: if the workforce pipeline is weak, regional production and supply chains become fragile, and costs rise.

The Committee should recommend:

1. **Regional training capacity upgrades** in priority freight hubs (TAFE/RTO access, assessment availability, and modern training methods such as simulation where appropriate), tied to measurable throughput (starts, completions, conversion time).

2. **Stackable, targeted micro-credentials** for high-value competencies that matter in rural freight (e.g., livestock handling/welfare, biosecurity hygiene practices, chain-of-responsibility compliance, fatigue risk systems). The National Microcredentials Framework defines micro-credentials as shorter, targeted learning that can be quality assured and, where designed appropriately, **stacked** towards broader qualifications.[39]

3. **Targeted migration settings where shortages are demonstrated**, using existing skilled visa architecture designed to address labour shortages when employers cannot source appropriately skilled Australians.[40] This should be tightly framed: competence verification (via NHVDCF-aligned assessment), regional placement, and safeguards to prevent misuse—so it supports productivity and regional resilience rather than becoming a blunt lever.

Component C — Resilience enablers as continuity infrastructure

Regional freight continuity is a productivity issue because disruptions create economy-wide costs (missed export windows, processor downtime, retail shortages, animal welfare risks, and recovery inefficiency). The Committee should recommend:

1. A "credentialled surge" model: a mechanism for rapid redeployment of verified drivers during declared disruptions, including extreme weather, major road closures and animal health incidents.

2. Agreed continuity protocols (pre-agreed operational arrangements across jurisdictions and key agencies) so that, during disruptions, the system prioritises safe continuity of essential freight without ad hoc, last-minute improvisation.

---

[37] NCVER 2023, *Exploring the recognition of prior learning in the Australian VET sector*, National Centre for Vocational Education Research, https://www.ncver.edu.au/research-and-statistics/publications/all-publications/exploring-the-recognition-of-prior-learning-in-the-australian-vet-sector, viewed 18 February 2026.
[38] Senate Select Committee on Productivity in Australia, *Productivity in Australia: Discussion Paper* (regional settlement strategy constraints including skilled worker retention/training infrastructure).
[39] Australian Government Department of Education n.d., *National Microcredentials Framework*, https://www.education.gov.au/higher-education-standards-panel/national-microcredentials-framework, viewed 18 February 2026.
[40] Department of Home Affairs n.d., *Skills in Demand visa (subclass 482): Core Skills stream*, Australian Government, https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/skills-in-demand-482/core-skills-stream, viewed 18 February 2026.

3. Embed livestock welfare competence within surge arrangements, consistent with Australia's land transport livestock welfare standards which emphasise competent handling and transport practices.[41] This ensures resilience does not trade off welfare.

5.4 Why this lifts productivity

This reform increases productivity through four channels:

- **Higher utilisation of capital:** fewer parked assets due to driver scarcity and slow onboarding.
- **Lower matching friction:** qualified people can move to where demand is, faster.
- **Faster conversion of adjacent labour:** experienced workers gain recognition without redoing learning they already have (RPL and competence verification).
- **Lower disruption costs:** trusted surge deployment reduces downtime and variance during shocks.

5.5 Implementation and sequencing

0–12 months

- National Cabinet commitment to NHVDCF implementation milestones and reporting.
- Design the Freight Skills Passport data standard (competencies and verification and privacy).
- Publish nationally consistent RPL evidence packs and target decision timeframes for priority competencies.

1–3 years

- Pilot Passport in 2–3 regional freight hubs; expand to all jurisdictions.
- Fund training capacity uplift in priority hubs (measured by completions and conversion time).
- Deploy initial stackable micro-credentials aligned to the National Microcredentials Framework.

3–10 years

- Continuous improvement and benchmarking: conversion time, mobility outcomes, disruption recovery time.
- Periodic refresh of competencies to reflect technology, safety systems, and supply chain needs.

[41] Animal Health Australia 2012, *Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock*, Australian Government (DAFF hosting), https://www.agriculture.gov.au/sites/default/files/documents/australian-animal-welfare-standards-and-guidelines-land-transport-of-livestock.pdf, viewed 18 February 2026.

6. Implementation and sequencing

6.1 Implementation principles

Measure the friction. Publish it. Remove it. Freight performance is measurable. That makes it a practical place to start.

ALRTA proposes three delivery rules:

- Start with targets and transparency. Put the system on the clock.
- Build the digital base once. Use the same data standards for compliance evidence and reporting.
- Fund the binding constraints first. Fix compliance infrastructure (washdown and lawful managed effluent disposal) and the regional workforce pipeline before anything else.

This sequencing matches the Committee's focus on measurement gaps, capital deepening, regulatory burden, and labour mobility barriers.

6.2 First 12 months: set targets, publish baselines, run pilots

System-wide actions

- Create a National Freight Productivity Scorecard with 8–12 measures. Report quarterly. Use the median and the 90th percentile.
- Set national targets for washdown/effluent coverage and compliance detour/queue time, duplicated steps, and workforce conversion time. Publish the baseline.

Reform 1 — Washdown and managed effluent disposal

- Publish a baseline of washdown and lawful managed effluent disposal coverage on priority corridors and at key hubs. Report detour and queue time (median and 90th percentile) and the main failure points.
- Stand up a national register and a staged rollout pipeline. Set minimum facility standards, fix eligibility settings that block delivery, and co-fund the first tranche of priority corridor and hub sites.

Reform 2 — Harmonise and digitise regulation

- Define what counts as "once-only" evidence. Publish the exceptions.
- Agree minimum national data fields and definitions. Run 2–3 pilots that stop operators re-keying and re-proving the same information.

Reform 3 — Workforce mobility and resilience

- Set target processing times for licensing, RPL and skills recognition. Publish performance against those targets.

- Pilot 2–3 regional hubs. Lift training throughput. Cut time-to-competence. Test a simple surge protocol for major disruptions.

6.3 Years 1–3: scale what works, remove constraints

Reform 1 — Washdown and managed effluent disposal

- Deliver the first tranche of priority corridor and hub sites, with consistent minimum facility standards and operating availability.
- Scale the network nationally through a staged corridor plan and co-investment, expand the national register, and build surge capacity for seasonal peaks and biosecurity escalation.

Reform 2 — Harmonise and digitise regulation

- Make once-only evidence the default. Limit duplicate audits to published exceptions.
- Roll out digitised compliance templates that work for small regional fleets. Avoid a "compliance upgrade tax".

Reform 3 — Workforce mobility and resilience

- Scale training throughput and portability nationally. Track starts, completions and time-to-competence.
- Create a credentialled surge pool for peak periods and major disruptions. Redeploy verified people fast, without rework.

6.4 Years 3–10: continuous improvement and benchmarking

- Shift from projects to system improvement. Refresh standards. Improve automation. Tighten targets as capability grows.
- Benchmark against comparable jurisdictions and publish annual results.

7. Monitoring, evaluation and benchmarking

Measurement matters. Productivity is hard to count, but benchmarking is non-negotiable. Freight is easier. Friction shows up in time, variance and rework. Measure it. Publish it. Fix it.

7.1 What to measure and how

ALRTA proposes a single public National Freight Productivity Scorecard, aligned to the three reforms. It should do three things:

1. Track time, variance and duplication.
2. Report the median and the 90th percentile. The median shows the typical case. The 90th percentile shows the worst delays, where productivity bleeds out.
3. Publish quarterly results, backed by an annual review.

7.2 The KPI set

Keep the KPI set small. Tie each metric to a decision. Below is a proposed KPI set aligned to the three reforms.

Reform 1 — Washdown and managed effluent disposal: remove the compliance time tax

These KPIs show whether lawful washdown and disposal is practical where the task occurs.

Coverage

Share of priority corridors and hubs within a defined distance/time of a fit-for-purpose facility.

Uptime

Facility availability (hours open, outages, and peak congestion periods).

Time saved

Detour and queue time avoided on priority routes and nodes (before/after).

Compliance outcomes

Trends in effluent spill incidents and unlawful disposal events (where data exists).

Shock readiness

Time to activate surge capacity and operational changes during a biosecurity escalation.

Reform 2 — Harmonise and digitise compliance: cut duplicated transactions

These KPIs show whether compliance becomes a reusable asset, not repeated paperwork.

Duplication and re-entry

- **Duplicate audit incidence**: share of audits covering equivalent controls already audited elsewhere.
- **Data re-entry burden**: number of separate submissions or portals requiring the same core data fields.

Time and cost

- Compliance administration hours per operator per year (measured by an annual survey).
- Time to recognition for equivalent controls.

Safety and targeting

- Maintain or improve safety outcomes. Redirect effort from duplicate audits to risk-based activity.

Reform 3 — Workforce mobility and resilience: cut onboarding time and keep freight moving

These KPIs show whether labour can move to where the task is, fast.[42]

Portability and conversion time

- **Time to employment** for new entrants and experienced conversions (median days).
- RPL and recognition processing time for defined competencies.
- **Portability indicator**: share of hires filled using portable, verifiable competence recognition.

Pipeline throughput

- **Training throughput in priority hubs**: starts, completions, and time-to-competence.
- **NHVDCF implementation coverage**: jurisdictions adopting updated standards and assessment materials as rollout begins.

Resilience

- **Surge activation time** during declared disruptions (time to mobilise credentialled workforce and restore continuity).
- **Continuity performance**: days of critical service interruption during major events, and time to restore normal flows.

7.3 Data sources and reporting

Use existing systems. Standardise the data. Publish one national view.

- Washdown/effluent: a national register of washdown and lawful managed disposal facilities (location, capability, hours and disposal arrangements), supplemented by facility reporting on uptime/capacity and operator reporting (e.g., detour and queue time) aligned to common standards.
- Compliance duplication and admin hours: a simple national survey instrument (annual), plus regulator reporting on duplicate audits and decision timeframes for recognising equivalent controls.
- Workforce pipeline: VET/RTO throughput metrics, licensing and recognition processing times, and adoption milestones for national competency frameworks.[43]
- Productivity context: align definitions with national statistical practice so freight metrics can be interpreted alongside economy-wide productivity measures.[44]
- Labour-market context: align reporting to national analysis on productivity, participation and barriers, including where portability and structural friction slow matching.[45]

---

[42] Parliament of Australia, Select Committee on Productivity in Australia, Discussion paper, 2025, section 'Dynamism of Australia's labour market' (accessed 17 February 2026).
[43] Austroads, National Heavy Vehicle Driver Competency Framework (NHVDCF), 31 March 2025 (accessed 17 February 2026).
[44] Australian Bureau of Statistics 2025, 'A primer on labour productivity' (webpage, 3 September), https://www.abs.gov.au/articles/primer-labour-productivity, viewed 18 February 2026.
[45] Jobs and Skills Australia, Jobs and Skills Report 2025: Connecting for impact, 4 November 2025 (accessed 17 February 2026).

7.4 Evaluation and course-correction

- Publish a baseline set of results in year 1. Set year-3 and year-10 targets. Update annually.
- Each year, publish what moved, what stalled, and what decisions are needed next.
- Keep safety guardrails explicit. This is not de-regulation. It is removing duplication while protecting outcomes.[46]

7.5 Benchmarking: compare, lift, and sustain

Benchmark in three layers:

1. **Within Australia:** compare performance across jurisdictions on washdown/effluent coverage, uptime and time-tax measures, as well as compliance duplication/admin burden and workforce conversion times (including disruption recovery for essential regional freight).
2. **Against best practice**: identify the best-performing corridors and jurisdictions, then lift the laggards to that bar.
3. **Internationally where it fits**: use comparable national productivity and competitiveness context, consistent with the Committee's benchmarking focus.[47]

[46] Parliament of Australia, Select Committee on Productivity in Australia, Discussion paper, 2025, section 'Australia's regulatory burdens that limit productivity' (accessed 17 February 2026).
[47] Parliament of Australia, Select Committee on Productivity in Australia, Discussion paper, 2025, sections 'Challenges in measuring productivity' and 'Australia's global competitiveness' (accessed 17 February 2026).