

15 September 2025

Ms. Danielle Wood  
Chair  
Productivity Commission

## Via Online Upload

Dear Ms Wood,

### **Response to Interim Reports on Five Productivity Inquiries**

The Australian Livestock and Rural Transporters Association (ALRTA) welcomes the opportunity to respond to the Commission's interim reports across the five pillars. As the national peak body for rural and livestock transport operators, our members connect farms, saleyards, feedlots and processors to domestic and export markets across every state and territory. This submission focuses on the four pillars most material to rural and livestock transport (Pillars 1–4). We support practical, economy-wide reforms that lift investment, reduce duplicated regulation, unlock data productivity, build a more adaptable workforce, and improve service delivery in regional Australia.

#### **Pillar 1: Creating a More Dynamic and Resilient Economy**

Livestock and rural freight businesses run on thin margins over long distances. Inconsistent access rules, duplicated audits and multi-step approvals add time and cost, slow investment in safer, higher-productivity vehicles, and forced detours where bridges and last-mile links are constrained. The objective is simple: nationally consistent rules that enable safe productivity, reduce duplicated assurance, and give operators predictable, digitally supported access to networks. We operate in one of Australia's most hazardous workplace environments—agriculture has the highest fatality rate nationally and transport is the second (14.7 and 9.5 per 100,000 workers, respectively; Safe Work Australia 2023). We consider a nationally consistent access setting and nationally recognised safety standards as key elements to creating a more dynamic and resilient rural economy.

- **National consistency in livestock mass, dimension and PBS access settings.**  
The establishment of a nationally consistent livestock mass, dimension and Performance Based Standards (PBS) access system will lift effective payloads, reduce trip numbers and lower emissions intensity (less CO<sub>2</sub> per tonne-kilometre—more freight moved for the same fuel) while maintaining local asset protection. Consistent PBS criteria ensure vehicles meeting nationally agreed performance standards can operate predictably across networks (NHVR n.d.-e; NHVR n.d.-f).
- **AS 5340 as a national safety standard for ramps and forcing pens.**  
Introduce AS 5340:2020 as a national safety standard in its own right, explicitly designed to reduce serious injury risk to workers at the animal interface (loading/unloading). Consistent adoption at farms, saleyards, feedlots and processors will cut lost-time injuries and unplanned downtime that currently cost the industry millions in avoidable productivity losses, while strengthening animal-welfare outcomes and reliability (Standards Australia 2020a; Standards Australia 2020b).
- **One national access and permitting pathway.**  
Deliver a nationally consistent, digital access and permitting system with live access

information so operators, councils and road managers share one source of truth and avoid re-keying and duplicated queries. Clear heavy vehicle national law (HVNL) settings, road-manager consent processes and the use of pre-approvals for frequently used routes reduce processing times and re-work while maintaining local asset protection (NHVR n.d.-a; NHVR n.d.-b; NHVR n.d.-c).

- **Recognition and reciprocity for sector accreditation schemes.**

Recognise credible livestock assurance/accreditation schemes (against published criteria) and adopt reciprocity so verified operators are not re-audited for substantially the same controls by multiple counterparties. Using Registered Industry Codes of Practice as common benchmarks—such as the Master Industry Code and the managing-effluent code—helps counterparties and auditors rely on recognised evidence rather than duplicating checks (NHVR 2018; NHVR 2022; NHVR n.d.-d).

### **Recommendations:**

- Harmonise livestock mass, dimension and PBS access settings that lift payload efficiency, reduce trips and lower emissions intensity (less CO<sub>2</sub> per tonne-kilometre — more freight moved for the same fuel), while maintaining asset protection.
- Adopt AS 5340:2020 as a national safety standard at high-throughput livestock sites to reduce serious ramp-related injuries, downtime and insurance costs.
- Deliver a nationally consistent digital access and permitting system with live access information to reduce re-keying and delays.
- Adopt recognition/reciprocity for credible sector schemes to avoid duplicate audits, using registered industry codes as reference points.

### **How success would be monitored:**

- Reported approval times and re-work steps in permitting, including the share of applications decided within published timeframes.
- Adoption of AS 5340-consistent facilities at major livestock nodes.
- Incidence of duplicate audits for operators participating in recognised schemes.
- Reduction in serious ramp-related injury claims year-on-year, with annual public reporting of lost-time injury frequency rates at loading facilities and audited ramp-compliance rates.
- Documented reductions in unplanned downtime and insurance claims cost at AS 5340-compliant sites to demonstrate ROI and regulatory justification.

### **Pillar 2: Investing in cheaper, cleaner energy and the net-zero transformation**

Regional freight is essential and mostly delivered by small and medium enterprises running long-haul, variable duty cycles. New technology must work at depots, saleyards and processors—not only in metropolitan hubs—and upgrades must not jeopardise reliability. The aim is practical, technology-neutral enablers that cut emissions where feasible now, prepare real freight corridors for emerging options, and keep costs predictable for operators. Given the present lack of like-for-like fuel alternatives for long-haul heavy vehicles, government should avoid measures that unfairly raise costs (e.g., carbon-related taxes on diesel) until viable substitutes are available at scale; instead, policy should focus on enabling, technology-neutral pathways that deliver verified abatement.

- **Technology-neutral fuel flexibility.**

Support the availability and uptake of lower-carbon liquid fuels—particularly renewable diesel (hydrotreated vegetable oil, HVO)—for heavy vehicles where lifecycle abatement is independently verified. HVO is a paraffinic “drop-in” diesel produced by hydrotreating oils and fats and is already a commercial pathway for hard-to-electrify segments; it can be used in many existing compression-ignition engines and logistics systems, subject to manufacturer approval and fuel quality specifications (IEA-AMF n.d.; IEA 2023; Erkkilä et al. 2011; EN 15940:2019). Lifecycle claims should be substantiated using recognised LCA methods (ISO 14040:2006/AMD 1:2020; ISO 14044:2006/AMD 2:2020) and prioritise waste- and residue-based feedstocks to protect integrity. To improve supply and lower delivered costs, we support consideration of a national low-carbon fuel standard that reduces lifecycle fuel intensity over time while remaining technology-neutral, alongside time-limited support for early uptake of zero/low-emission trucks (e.g., vouchers that bridge the capital price gap) (Australian Trucking Association 2025).

- **Freight-relevant corridor infrastructure at real nodes.**

Publish staged plans for dependable charging and hydrogen refuelling that prioritise high-utilisation freight nodes—depots, saleyards, processors and staging areas—co-designed with distribution networks to ensure capacity and operational reliability. Plans should align with national programs that fund zero-emission heavy-vehicle demonstrations and corridor infrastructure so investments land where freight actually stops (DCCEEW 2023 — National Electric Vehicle Strategy; ARENA 2024–25 — Heavy-vehicle charging and hydrogen refuelling initiatives). Plans should explicitly account for heavier tare mass of zero-emission trucks and access implications on priority links (Australian Trucking Association 2025).

- **National livestock effluent management plan (with CSIRO).**

Develop a national effluent management plan in partnership with CSIRO to standardise capture, containment and disposal at saleyards, processors and along priority corridors. The plan would map high-incidence sites, set service-level expectations (including spacing/amenity), and embed practical operator guidance via the Managing Effluent in the Livestock Supply Chain Registered Industry Code of Practice (NHVR 2022).

- **Effluent-to-energy pilots.**

In collaboration with an industry partner, pilot effluent-to-energy solutions (e.g., anaerobic digestion/biogas, co-processing at wastewater plants) to reduce environmental impacts and offset part of the sector’s net carbon contribution through verified energy recovery. (Proposal; verification to use the same LCA framework as above: ISO 14040/14044.)

### **Recommendations:**

- Enable technology-neutral fuel flexibility by supporting supply and verified use of renewable diesel (HVO) for heavy vehicles where lifecycle abatement is demonstrated using recognised LCA methods and consider a national low-carbon fuel standard to increase availability while remaining technology-neutral.

- Provide time-limited, technology-neutral support for early uptake of zero/low-emission trucks and enabling technologies (e.g., vouchers that bridge the capital price gap), targeted to real-world freight tasks.
- Publish freight-node corridor plans for charging and hydrogen refuelling, coordinated with national programs and network businesses to ensure dependable operation.
- Establish a national livestock effluent management plan with CSIRO, including corridor facility spacing, design standards and operating guidance, aligned to the registered industry code.
- Fund effluent-to-energy pilots with robust measurement/verification so recovered energy can be credited toward sector emissions reporting where appropriate.
- Avoid punitive, carbon-related tax changes on road freight until viable fuel/equipment substitutes exist at scale for long-haul/high-mass tasks; prioritise enabling measures that deliver verified abatement first.

#### **How success would be monitored:**

- Verified lifecycle emissions reductions from fuel switching on long-haul tasks and increased availability of lower-carbon fuels at regional nodes.
- Availability and reliability of charging and hydrogen refuelling at priority freight nodes; operator usage and dwell times.
- Coverage, spacing and uptime of compliant effluent/washdown and amenities across key livestock corridors; operator and community feedback on amenity and environmental outcomes.
- Energy recovered and emissions offset through effluent-to-energy pilots (independently verified).
- Total cost of ownership trends for zero/low-emission trucks on representative regional tasks; number of voucher-supported deployments and fuel-standard credit generation (if adopted).
- Access outcomes on priority links reflecting heavier ZEV tare (e.g., pre-approvals or conditional access), to ensure infrastructure planning and policy remain aligned.

#### **Pillar 3: Harnessing data and digital technology**

Compliance for regional road freight is data-heavy—driver fatigue and Chain of Responsibility, animal welfare and biosecurity, plus road access and permits. For small operators, fragmented systems and re-typing the same information add cost without improving safety. The aim is simple: capture information once, share it with those who need it, and turn it into faster approvals and better risk management. Trusted telematics should be scaled as a key enabler of conditional access and data-driven decisions, reducing approval times while protecting infrastructure (Austroads/TCA n.d.; NHVR 2025a).

- **Nationally consistent digital access and permitting.**  
Deliver a nationally consistent, digital access and permitting system with live access information so operators, councils and road managers share one source of truth, reduce re-keying and duplicated queries, and shorten approval times. Within the Heavy Vehicle National Law (HVNL) framework, clear road-manager consent arrangements and the use of pre-approvals for frequently used routes can materially reduce processing time while maintaining asset protection and local oversight (NHVR 2025a; NHVR 2025b; NHVR n.d.-a). Integrate trusted telematics (e.g., the Telematics Monitoring Application, TMA, and Road Infrastructure Management, RIM) to support

conditional access—speed, location, mass and time-of-day conditions—so that compliant operations can be pre-approved or moved to faster decisions (Austroads/TCA n.d.; NHVR 2025a).

- **Simple, auditable tools aligned to registered industry codes.**  
Publish checklists, model procedures and evidence logs that track directly to the Master Industry Code of Practice (a Registered Industry Code of Practice under the HVNL) and to Managing Effluent in the Livestock Supply Chain (also registered). Templates that mirror registered codes let small firms show good practice without unnecessary paperwork and give auditors a recognised benchmark (NHVR 2018; NHVR 2022; NHVR n.d.-b). Where operators opt-in to trusted telematics, link these templates to digital evidence (e.g., automated logs) so compliance can be demonstrated without re-keying.
- **Clear criteria, timeframes and status visibility.**  
Publish route-assessment criteria, indicative conditions and decision-time targets, and provide application/status visibility to applicants and road managers. Transparent rules reduce uncertainty, support better applications, and help road managers prioritise constrained assets and manage workload effectively (NHVR n.d.-a; NHVR 2025b; NHVR n.d.-c). Publish where telematics evidence can substitute for manual conditions (e.g., speed zones, curfews) so applicants know when opting-in will shorten assessment.

***Case in point—telematics unlocking access***

A PBS high-productivity combination operating under TMA/RIM demonstrated compliant speeds and axle group loads over a defined corridor trial. The road manager subsequently converted a permit-only link to pre-approved conditional access, cutting average permit processing times and reducing detours while maintaining infrastructure protections (Austroads/TCA n.d.; NHVR 2025a).

**Recommendations:**

- Deliver a nationally consistent digital access and permitting system with live access information across jurisdictions.
- Publish standardised application data fields, criteria and decision-time targets to reduce re-work and improve predictability.
- Provide SME-friendly templates aligned to registered industry codes to support compliance and reduce duplicative paperwork (NHVR 2018; NHVR 2022).
- Scale trusted telematics (TMA/RIM) as a conditional-access tool within the national system, with clear data-use rules and safeguards.
- Incentivise telematics uptake by integrating participation with access pre-approvals and compliance-assurance programs (e.g., faster decisions, longer permit durations, streamlined audits for participating operators).

**How success would be monitored:**

- Share of applications decided within published timeframes; average decision time by route type/road manager.
- Re-work rate (percentage of applications returned for correction) and number of re-keying steps reported by operators.

- Alignment between published templates and registered industry codes (audit feedback).
- Share of access decisions using telematics evidence (TMA/RIM) and number of routes converted from permit-only to pre-approved conditional access.
- Median approval times for telematics-supported applications versus non-telematics applications.
- Infrastructure compliance outcomes on telematics-enabled links (e.g., speed/mass exceedance rates).

#### **Pillar 4: Building a skilled and adaptable workforce**

Regional freight reliability ultimately depends on people. Persistent driver shortages, slow recognition of prior experience and limited access to regional training constrain capacity and delay investment in safer, higher-productivity gear. The aim is to widen the pipeline and speed safe entry—without lowering standards—by recognising skills people already have, delivering job-ready training in the regions, and targeting migration where verified gaps persist.

- **Portable, accelerated pathways (recognition of prior learning and credit transfer).**  
Establish nationally consistent recognition-of-prior-learning (RPL) and credit-transfer settings so experienced candidates (e.g., agricultural operators, defence/logistics, interstate movers) can demonstrate competence and move into higher duties sooner. Evidence from NCVET shows RPL is a formal mechanism to convert existing skills into recognised outcomes, with clearer processes and cost transparency improving access and uptake (NCVER 2020; NCVER 2020b).
- **Front-loaded, job-ready modules delivered in the regions.**  
Allow candidates to complete core pre-employment modules—fit-for-duty/medical checks, fatigue and Chain-of-Responsibility fundamentals, defensive driving, and livestock animal-handling—before a firm offers a role, followed by supervised hours on the job. This mirrors the competency-based approach in ongoing reforms to the National Heavy Vehicle Driver Competency Framework (Austroads 2023; Austroads 2024) and should articulate as short, stackable micro-credentials under nationally recognised arrangements (Department of Education 2022).
- **Targeted migration for proven shortages (ANZSCO 733111).**  
Add Truck Driver (General)—ANZSCO 733111, which explicitly includes Livestock Haulier and Road Train Driver as specialisations—to the Core Skills Occupation List (CSOL) for the Skills in Demand visa's Core Skills stream, paired with safe, supervised induction and rapid recognition of equivalent overseas licences. ABS confirms the occupation definition and specialisations (ABS 2021). The CSOL underpins the Core Skills stream (Home Affairs 2025a), and the current CSOL is published as an official Home Affairs document (Home Affairs 2024). Jobs and Skills Australia reports a median age of 48 for Truck Drivers, reinforcing pipeline needs (JSA 2025).

#### **Recommendations:**



- Establish clear, nationally consistent RPL and credit-transfer settings, and publish a simple, searchable record of credit decisions to improve portability and predictability (NCVER 2020).
- Support front-loaded, regionally delivered, competency-based modules that articulate into full qualifications under nationally recognised arrangements (Austroads 2024; Department of Education 2022).
- Add ANZSCO 733111 Truck Driver (General)—including the Livestock Haulier and Road Train Driver specialisations—to the CSOL for the Skills in Demand visa (Core Skills stream), with supervised induction and rapid recognition of equivalent overseas licences (ABS 2021; Home Affairs 2025a; Home Affairs 2024; JSA 2025).

#### **How success would be monitored:**

- Increased use of RPL/credit transfer pathways reported by RTOs and employers (NCVER 2020b).
- Availability of regional modules and their credit recognition into full qualifications (Department of Education 2022).
- Time-to-hire and onboarding improvements for heavy-vehicle roles, with occupation age-profile and labour-market indicators tracked via Jobs and Skills Australia (JSA 2025).

#### **Conclusion**

ALRTA supports practical, evidence-based reforms that lift productivity while safeguarding safety, animal welfare and community amenity in regional Australia. We stand ready to assist the Commission with implementation detail, case studies and pilot sites.

Please contact our General Manager, Policy and Strategy, Mr Ashley Mackinnon, via [ashley@alrta.org.au](mailto:ashley@alrta.org.au) or 0407 766 153 to discuss further.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Gerard Johnson', is written over a light blue horizontal line.

Gerard Johnson  
President,  
Australian Livestock and Rural Transporters Association

#### **Contact**

Ashley Mackinnon – General Manager, Policy and Strategy  
M: 0407 766 153  
E: [ashley@alrta.org.au](mailto:ashley@alrta.org.au)

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