

Regional Development Australia Wheatbelt: Agriculture Regulations Submission – August 2016

1 INTRODUCTION

Regional Development Australia Wheatbelt Inc. (RDA Wheatbelt) is a locally based, not-for-profit, incorporated association governed by a volunteer committee, and funded by the Federal Government. RDA Wheatbelt makes this submission as a stakeholder in the rural and remote location of the Western Australian Wheatbelt. The key role of RDA Wheatbelt is to build strong and effective partnerships across all levels of government, industry, community groups and other regional stakeholders to boost the economic capability and performance of the Wheatbelt.

As the following illustrates, the Wheatbelt makes a considerable contribution to the State and National economy. The region produces approximately 50% of WA's grain¹ and has around 50% of the state's sheep flock². It also comprises a major element of the state's poultry industry contributing 51% of WA's egg production in 2010-2011³. In addition there is substantial horticulture industry in the region producing 88% of the state's olives, 64% of oranges, 57% of limes and 58% of lettuce⁴. Mining likewise has a considerable presence in the Wheatbelt contributing approximately \$2.5 billion in 2012-2013⁵.

However the funding and logistics associated with transport requirements and maintaining roads in delivering these outcomes are extensive. The Wheatbelt region of Western Australia has 42 Local Governments which represents 31% of all local governments in WA. There are approximately 5,000 agribusinesses dispersed across 155,000 square kilometres in over 200 communities in the region. This includes about 4,000 broadacre farms producing grain and stock with the balance being mostly horticulture enterprises. In undertaking business these enterprises rely on 44,854 km of road which represents 29% of WA's road km and includes: 41,843 km of local roads; 2,482 km of state roads and 529 km of Federal funded roads⁶.

¹ DRD 2014. Wheatbelt: A Region in Profile 2014; Department of Regional Development, Perth

² DRD 2014. DRD analysis of ABS data 7503.0; Value of Agricultural Commodities Produced, Australia, 2013-2014 (Unpublished) Department of Regional Development, Perth in Wheatbelt Development Commission 2015. Wheatbelt Blueprint: A vision for a vibrant future.

³ DRD 2014. DRD analysis of ABS data 7503.0; Value of Agricultural Commodities Produced, Australia, 2013-2014 (Unpublished) Department of Regional Development, Perth in Wheatbelt Development Commission 2015. Wheatbelt Blueprint: A vision for a vibrant future.

⁴ DRD 2014. DRD analysis of ABS data 7503.0; Value of Agricultural Commodities Produced, Australia, 2013-2014 (Unpublished) Department of Regional Development, Perth in Wheatbelt Development Commission 2015. Wheatbelt Blueprint: A vision for a vibrant future.

⁵ DMP 2015. Western Australian Mineral and Petroleum Statistics Digest 2013-2014, Department of Minerals and Petroleum, East Perth, WA.

⁶ MRWA 2016. Main Roads in the Wheatbelt Region. Main Roads WA presentation to joint WDC/RDAW meeting, Dalwallinu, WA.

There are a range of issues associated with governance, usage, road maintenance issues, funding and charging frameworks that need to be addressed to ensure future sustainability of road infrastructure in the Wheatbelt and state. However, based on consultation with Wheatbelt stakeholders the issues this submission addresses, are:

- Regulatory concerns in relation to restrictions on access to the road network, especially for the 'first and last mile' of a journey.
- Processing times for road access permits.
- Restrictions on moving agricultural machinery.

The structure of the submission will address issues and present comments from Wheatbelt stakeholders where relevant, and offer recommendations based on the comments and additional consultations with other stakeholders.

Summary

An overriding aim of Main Roads WA (MRWA) is to initiate a distinct continuous freight network in the Wheatbelt. This has added importance due to the proposed closure of the Tier 3 rail network which will shift more freight such as grain onto the region's road network.

MRWA in addressing what is at the moment a 'wicked problem' in trying to balance the need for sustainable funding now and into the future while at the same time ensuring cost impacts on productivity are limited are developing the "Wheatbelt Freight Strategy: Local Roads". In providing a definitive freight network in the Wheatbelt, MRWA will work with Local Government Authorities (LGA) to classify and decide which Local Government roads should be the main collector roads to bring freight traffic to the Main Roads Network. Additionally MRWA will have in place three work streams which will address: the Restricted Vehicle Access (RVA) assessment backlog; the Final Mile and the development of a plan for a secondary road freight network in the wheatbelt.

At the same time there is concern that the current model for road funding and use is under duress and could be unsustainable in the future. It is argued that existing road governance, funding and charging frameworks will be inadequate in addressing future challenges derived from sustainable funding for maintenance which in turn will lead to declining road quality and restriction on increased load limits.

MRWA propose that a road user charging system would, through 'pay for use', increase access as rising road maintenance costs could be recovered from users. However this approach conflicts with the situation in WA where the emphasis is on providing access to heavy vehicle operators to achieve productivity gains.

Issue: Regulatory concerns in relation to restrictions on access to the road network, especially for the 'first and last mile' of a journey.

The regulations associated with access restrictions especially with the first and last mile of the journey is a major issue for local governments in the Wheatbelt where: "...the level of access is lower than on available freight routes."⁷ A key concern is that more often than not local roads do not meet the necessary criteria for heavy vehicle usage. This results in larger heavy vehicles legally able to use arterial roads being unable to legally access local roads off the arterial routes to collect or deliver loads. As a consequence either productivity is compromised in meeting the legal requirements or as the accompanying case study illustrates, heavy vehicles illegally access local roads through necessity

⁷ Australian Local Government Association: First and last mile issues topic of Roads Congress discussion <http://alga.asn.au/?ID=11812>

to complete deliveries or collections (Comment 1). The Australian Local Government Association acknowledge that the first and last mile access problems also extend to state and territory roads and limit the use of heavier vehicles which in turn has a negative impact on productivity.

Comment 1: Cr. L, Baker, Corrigin Shire President, Head of Wheatbelt South Regional Road Group

First and last mile is the greatest issue in the Shire of Corrigin. The fact is that “first and last mile” local roads are currently being used illegally and will continue to be, simply because fertiliser and produce must be moved on and off farm. It was reported recently that a local grocery store was “illegally” receiving its weekly order because the road was not rated for heavy vehicle use.

It is not envisioned that a massive program of upgrading last mile roads be undertaken but instead a system of permits be put in place to accommodate farmer’s seasonal requirements in regard to using heavy vehicles on local roads. In effect the farmer would nominate a time period to move produce from specific paddock, gate or road locations during harvest or receive heavy load deliveries to specific locations on their property prior and during seeding periods. In addition the farmer would nominate specific contractors or trucks and specified conditions would be applied to each ‘final mile’.

While the first comment was largely focused on productivity issues for farmers and contractors the second comment considers questions of safety particularly in regard to the people and families who live along or use the affected local roads in undertaking normal daily travel routines of travelling to and from local towns for work or school.

Comment 2: Cr. R, Storer; Koorda Shire President, Head of Wheatbelt North Regional Road Group

I agree that the final mile is an issue, but a couple of things that need to be remembered are, that in regards especially to "network 7", some roads will not meet basic requirements of swept paths and interface distances, which would not allow longer vehicles to operate safely under any conditions.

The majority of traffic on these final miles will be from the people actually living on these roads and if we allow, even under permit conditions, large vehicles to travel on unsuitable roads, it is these farmers and their families that will be at risk. I’m not sure that anyone would endorse this practice if it could result in a family member being seriously injured or worse. It is not only the risk of collisions and run offs, but also the detrimental impact of heavy vehicles on poorly constructed road surfaces, and the resulting damage that could cause accidents.

The other thing to be mindful of is that where will this end. If we allow network 7, how long before there will be “c trains” and “triples” being used. At some point a line needs to be drawn. While this may impact on some businesses, unfortunately without very expensive upgrades, I’m not sure of other safe alternatives and it will have to be a cost figured into individual businesses just the same as any other freight charges.

Having said that, I agree with Lyn, that with permits and under strict condition, mainly speed restrictions and operating times as well as identified routes that provided the roads meet basic network requirements, that this would be an acceptable solution to both Local Government Authority’s (LGA’s) and growers.

I would have thought that throughout Wheatbelt North, there would be very few roads that once assessed would not meet a basic standard of a network 4, and many a network 7, therefore a permit scenario would work well.

It may well be that LG's will need to allow for larger parking bays strategically placed to enable truck configurations to be split up to travel the "final mile" as appropriate vehicles in areas that are serviced by these minor roads. This strategy would allow for a legal and more cost effective solution than the present situation.

Recommendations

- RDA Wheatbelt in view of these comments and additional consultation with other Wheatbelt stakeholders submits that consideration be given to implementing a permit system similar in the provisions outlined in Comment 1 in the interim. That is that farmers nominate periods of time, locations and contractors and trucks when access for heavy vehicles is required for collection of produce or delivery of necessary farm inputs such as fertiliser.
- In addition RDA Wheatbelt submits that the construction of strategically based bays to allow for truck configurations to be split to facilitate the legal and safe 'Final Mile' travel of appropriate vehicles on local roads be considered in the medium term while long term strategies are formulated.

Issue: Processing times for road access permits

It has been noted by Wheatbelt stakeholders that there are delays in Main Roads WA (MRWA) processing access permits that is frustrating for road users and Local Government Authorities (LGA). However one LGA representative observed that LGA's may have contributed to this situation as many have applied to have multiple roads assessed in the shires which has taxed the MRWA limited resources.

There is an option for LGA's to self-assess which is seen by some as being costly and regarded as a cost shifting exercise but others view self-assessment as a viable option to be encouraged as a means of speeding up the process and enabling compliance to be assessed on a random basis.

RDA Wheatbelt views streamlining the road access permits as integral to the previous recommendations and optimising productivity without compromising safety of other local road users.

Recommendation

- Local Government Authorities are encouraged and financially assisted if necessary to move towards increased self-assessment to decrease lag time in permit approvals and alleviate delays and backlogs in permit assessment and approvals.

Issue: Restrictions on moving agricultural machinery

With the danger of stating the obvious RDA Wheatbelt contends that it is essential that farmers are able to move machinery between farm locations with minimal regulatory paper work and operational disruption. This has grown as an issue due to the increase in the land area of Wheatbelt farms. For example a study conducted in the Wheatbelt shires of Cunderdin and Trayning found that the average farm size of farm business participants was 5,100 ha with an average range between 1,300 ha and 12,000 ha⁸. With the increase in size many farm businesses have found themselves working locations within the same area but not directly adjoining the original property and having to access the road network to undertake farming operations.

The difficulty in managing the issue to ensure good outcomes for farmers and the safety of other road users is illustrated in the following comment.

⁸ Lacoste, M., Lawes, R., Ducourtieux, O. and Flower, K. 2015. "Farming practices at the landscape scale: A novel approach investigating rotations in the WA Wheatbelt". Presented at Proceedings of the 17th ASA Conference, Hobart. <http://www.agronomy2015.com.au/papers/agronomy2015final00340.pdf>

Comment 3: Cr. R, Storer; Koorda Shire President Wheatbelt North Delegate

With the use of larger farm machinery this is becoming an even bigger issue. Operators must be aware of restrictions before purchasing equipment.

There needs to be a realistic approach to restrictions so that it still allows for farmers and contractors to carry out their normal activities while allowing safe travel for other road users.

These should be applied differently depending on significance of the routes. For example, conditions applied to movements that are to travel on major highways would be more onerous than those on low volume roads.

Unfortunately, with the movement of agricultural machinery as with the use of heavy vehicle operators, there will always be cowboys. The challenge is to educate and eliminate these operators without penalising the majority who are responsible.

A part of this education process could include presentations by road and traffic managers, at the many grower meetings that are held at most communities across the Wheatbelt prior to harvest.

Recommendations

- RDA Wheatbelt views the observation that permits should be applied differently depending on the road classification and volume loads as a valid proposal that should be considered.
- RDA Wheatbelt also supports the suggestion that an education process be undertaken in relevant locations to ensure farm business and contractors are aware of their obligations to other road users.

Conclusion

An efficient, safe and maintainable road network is integral to the continued economic development and population growth of the Wheatbelt. Every effort must be invested to ensure sustainable outcomes are reached for the cross benefits of maintaining the road network without impacting productivity in the region.

Given the substantial contribution agriculture and mining make to the Wheatbelt Region and the importance of the extensive road network to those and other industries along with the community, RDA Wheatbelt values the opportunity to make this submission in consultation with and on behalf of all Wheatbelt stakeholders.

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