

5 October 2023

Department of Infrastructure, Transport,  
Regional Development,  
Communications and the Arts  
GPO Box 594  
CANBERRA ACT 2601

**Re: Review of the National Freight and Supply Chain Strategy**

GrainGrowers welcomes the Review of the National Freight and Supply Chain Strategy (NFSCS).

Increasing the productivity and efficiency of the supply chain is critical for the long-term viability of Australia's \$19 billion grain industry.

The Australia grain freight supply chain is characterised by long, complex, and multi-directional freight journeys across multiple modes of transport. From paddocks across regional and rural Australia, grain travels either by road, rail or a combination of both, to port for export or to domestic markets such as feed mills, malthouses and feedlots.

Inefficient supply chains have a significant and direct impact on Australian grain growers, undermining the global competitiveness of the Australian grain industry as well as threatening Australia's food security.

GrainGrowers recent report [Connecting the Dots: Improving Australian Grain Supply Chain Efficiency](#) highlights the key issues that are impacting freight efficiency, reducing grower profitability, and affecting international competitiveness. GrainGrowers is developing a grain-specific strategy to help guide our industry in tackling the biggest issues hampering productivity and a strengthened NFSCS will be critical to addressing these issues.

While the development of the NFSCS promised a holistic approach to improving supply chains, the full benefits of the strategy have not been realised. Recent events including bushfires, floods and COVID-19 have highlighted the inherent weaknesses of Australia's supply chains with aging infrastructure, disjointed regulation and the urgent need to reform our supply chains and update the NFSCS so it's equipped to address the enormity of the challenge.

To strengthen the NFSCS, GrainGrowers makes the following recommendations:

**1) Include decarbonisation as a goal of the NFSCS**

Decarbonisation will represent a fundamental shift to Australian grain production and the broader freight industry. As a hard to abate industry, this will require a nationally-coordinated, strategic and staged transition with collaboration across the supply chain and therefore it is vital that it is a core goal of the strategy.

**2) Include supply chain resilience as a goal of the NFSCS**

A resilient supply chain is critical for ensuring the efficient movement of grain to market. Severely damaged rail and roads are dramatically increasing the time and cost of moving freight to and from our rural production centres. Repeated flood events and persistent and unprecedented rainfall have deteriorated critical road infrastructure across Australia's grain growing regions and exacerbated systemic long-term underfunding of our regional road network. With climate change expected to increase the frequency and intensity of weather events such as heat waves, floods, and extreme temperatures, it is vital all levels of government use the current recovery period to strengthen Australia's long term supply chain resilience.

**3) Elevate the NFSCS as a priority at National Cabinet**

To ensure that NFSCS is actioned it is critical it is elevated as a priority in National Cabinet. National Cabinet is Australia's premier interjurisdictional body, providing the Prime Minister, Premiers and Chief Ministers with a forum to work collaboratively on issues of national significance. Ministerial Councils responsible for delivering these priorities are required to report regularly to National Cabinet on their progress, ensuring First Ministers continue to drive these reforms. Currently, the only transport priority identified as a priority for National Cabinet is rail interoperability.

**4) Strengthen NFSCS governance structures**

GrainGrowers is deeply concerned there is a lack of clarity on who is responsible for the delivery of the NFSCS. There are limited formal obligations across all levels of government to consider the NFSCS, which has only been exacerbated by the dissolution of the Infrastructure and Transport Council. It is vital formal mechanisms such as Intergovernmental Agreements are considered to clarify roles and responsibilities of Commonwealth and state governments, underpinned by transparent, ongoing monitoring and evaluation to increase accountability and adequate departmental resourcing.

**5) Increase formal mechanisms for engaging with industry within the NFSCS**

To ensure the ongoing success of the NFSCS it is crucial there is increased formalised engagement with industry, especially small, rural, and agricultural businesses to ensure the diversity of the industry properly considered. Industry knowledge and expertise is crucial in identifying issues and implementing initiatives. This must be through structured, ongoing processes rather than ad-hoc or informal departmental activities. It also requires engagement with diverse stakeholders. Despite the volume and economic importance of agricultural freight, farmer organisations are often not included in government consultation especially at a federal level. The current Freight Industry Reference Panel is too narrow and must be replaced with a broader panel that better reflects the diversity and breadth of the freight industry.

**6) Formalise the role of local government in the NFSCS**

Local government plays a key role in first and last mile infrastructure and regulations, and must be provided with suitable funding, support, and land use planning skills to deal with the increasing complexity of freight supply chains and challenges with managing

community expectations for both accessibility and amenity. Many local councils are still not aware of the National Urban Freight Planning Principles, which were designed to guide land use decision-making across all levels of government to improve planning for freight in Australia's metropolitan areas.

**7) Ensure better use of new and existing funding mechanisms to support NFSCS objectives**

Funding must be better utilised as a mechanism to influence practical behaviour change and uptake of NFSCS objectives. Indeed, states are typically listing existing infrastructure projects in their NFSCS implementation plans rather than funding targeted projects to achieve the aims of the strategy. It is crucial that targeted funding is provided to all levels of government to support NFSCS objectives. Additionally, NFSCS objectives must be inbuilt into Infrastructure Australia and state equivalent infrastructure organisations with funding of major transport, infrastructure, and planning projects contingent on demonstrable support for NFSCS to achieve long term change.

**8) Develop clearer objectives for the National Freight Data Hub and ensure up to date datasets**

GrainGrowers strongly supports the need for increased data to inform strategic planning for infrastructure and transport network investment. While the development of the National Freight Data Hub was one of the major initiatives of the NCSCS to address a lack of accessible national data, despite several years of operation and significant government investment, it continues to not provide meaningful, granular data. For example, many of the data sets including Number of Trucks on Roads (Heavy Vehicle Asset Register) and Road Condition and Expenditure are over 5 years old and still lacking nationally consistent data, inhibiting the value of the resources. It is crucial clear objectives are developed to ensure industry participation and work is prioritised on developing up-to-date, national consistent data sets to ensure the value of the National Freight Data Hub.

GrainGrowers would welcome the opportunity to discuss these issues further. Should we be able to provide further assistance or if there are any enquiries relating to our submission, please

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Yours sincerely,

[Redacted]

**Zachary Whale**  
**General Manager, Policy and Advocacy**