



## SUBMISSION

24 May 2024

Yorke Peninsula Council  
PO Box 57  
MATITLAND SA 5573

By Email: [admin@yorke.sa.gov.au](mailto:admin@yorke.sa.gov.au)

Dear Sir/Madam

**Re: Submission to Yorke Peninsula Council Heavy Vehicle Access Strategy**

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. With a membership of 3,600 sheep, beef cattle and goat production businesses, we work to secure a strong and sustainable livestock sector. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state which supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA welcomes the opportunity to provide comment on the Council's *Strategy for managing risk of B Double+ access to YPC's road network post HDS road network reviews* (strategy), which is important to our members.

### Background

The South Australia livestock industry acknowledges Council's efforts to improve road safety and infrastructure through the proposed strategy. However, we have significant concerns about some of the limitations and the potential adverse effects on transport of livestock and their associated supplies such as fodder.

Livestock and grain producers are critical to the region's economy. These businesses rely on the efficient heavy vehicle movement. The proposed restrictions, such as speed reductions, night curfews, and restrictions on certain vehicle configurations, will severely impact logistical efficiencies. This will contribute to delays in transporting livestock and fodder, resulting in potential financial losses as well as compromised animal welfare outcomes.

### Concerns with the strategy

#### 1. Data gaps

Throughout the strategy there is a lack of critical supporting data and evidence that is required to ensure decisions are being made in the best interests of the ratepayers and communities. We acknowledge that data may be costly and time consuming to acquire, but without it Council risks creating compromised outcomes for the livestock industry.

## 2. Night curfew

Livestock SA does not support the proposed night curfew (i.e. between 5pm to 7am). Livestock transport requires flexibility to move animals when it is most suitable for their welfare and market demands, as well as to comply with Heavy Vehicle National Law. Drivers of fatigue-regulated heavy vehicles are not allowed to drive or work more than the maximum work hours or rest less than the minimum rest hours in a certain period set out by law. Restricting movements to daylight hours would severely limit the flexibility needed to transport of livestock from the Yorke Peninsula. Negative impacts include compromising animal welfare, ability to meet markets, ability to effectively operate a business during busier times, and profitability of livestock transport companies.

## 3. Speed limits

Without further data, Livestock SA does not support the proposed speed limit reduction to 30 km/h for heavy vehicles on certain roads. This appears to be an arbitrary limit that does not account for the practical needs of livestock transport. Unjustified low-speed limits will result in increased travel times potentially reducing animal welfare outcomes, higher operational costs, and potential safety risks as drivers through driver fatigue.

## 4. Restricted vehicles and B-Double HML

Livestock SA questions the proposed restrictions on certain vehicle configurations, such as B-Double HML access, as we consider this may have perverse outcomes. B-Double configurations distribute weight more evenly across axles compared to separate prime movers pulling individual trailers. Therefore, to transport the same number of animals would require more trucks on the road that have a greater cumulative weight.

There are also practical implications for such restrictions including:

- increased operational costs as more prime movers and drivers are required
- time-consuming and logistically challenging activities involved with splitting trailers
- increased use of transit yards and potential delays for transporting livestock, which may create animal welfare concerns.

## 5. Inadequate infrastructure and support

The proposed strategy does not adequately address the underlying infrastructure issues that make HV operations challenging. With over 1,020 kilometres of narrow unsealed roads that lack sufficient passing opportunities, imposing additional restrictions without significant road improvements will only increase operational risks and inefficiencies for transport.

## 6. Wet conditions

The suggested operational constraints fail to consider the practical realities of agricultural work, where flexibility and responsiveness are essential. The wet conditions proposal needs to be clarified as it could prevent the effective operation of a livestock business.

Livestock SA appreciates the intent of the strategy, but considers the proposed restrictions are overly burdensome and lack underpinning data and evidence. We propose some alternative solutions for Council's consideration:

- **Infrastructure Investment:** Prioritise significant investment in road widening, sealing, and maintenance to improve safety and efficiency for all road users where required.
- **Flexible Guidelines:** Implement more adaptable guidelines that consider the unique needs of agricultural transport, such as conditional permits for extended operational hours during peak seasons.

- **Stakeholder Engagement:** Establish a collaborative framework involving livestock producers in decision-making processes to ensure that needs and insights are adequately represented.
- **Education and Awareness:** Increase public awareness of HV operations through educational campaigns, ensuring all road users understand the risks and best practices when sharing roads with heavy vehicles.

We urge Council to reconsider the strategy and work with industry to develop more balanced and practical solutions that ensure the safety and efficiency of our transport operations without compromising our industry's viability.

Please contact the Livestock SA office on (08) 8297 2299 or via email at [admin@livestocksa.org.au](mailto:admin@livestocksa.org.au) if you would like to discuss this submission further.

Yours sincerely

A solid black rectangular box used to redact the signature of Travis Tobin.

Travis Tobin  
Chief Executive Officer