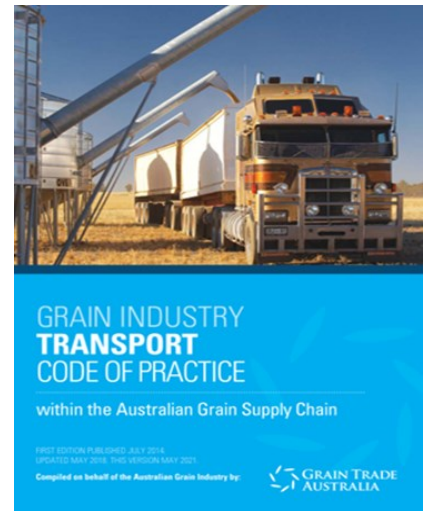


Practical Steps to CoR Compliance

National Heavy Vehicle Regulator (NHVR) Round 5 Heavy Vehicle

Grain Trade Australia (GTA) was successful in receiving funding under Round 5 of the Heavy Vehicle Safety Initiative (HVSI) and entered into a funding agreement with the NHVR on the 21st of December 2020 to further its objective to provide industry specific training in the 'Practical Steps to CoR Compliance' to support GTA members and industry participants. GTA was also previously successful in Round 3 of the HVSI.



Introduction

Grain Trade Australia (GTA) is a member-based association and is the focal point for the commercial grain industry in Australia. GTA supports the National Heavy Vehicle Regulator's (NHVR) efforts in promoting and raising awareness of transport safety.

The Australian grain industry operates within a self-regulatory framework and operates under the Australian Grains Industry Code of Practice (Code). This Code is mandatory for all GTA members, who account for approximately 95% of grain traded in Australia.

Ancillary to the Code, is the [GTA Grain Transport Code of Practice](#) (Transport Code) and Freight Contract. Adoption of this Transport Code and its guidelines by industry participants is a commitment to shared responsibility and has been designed to promote the use of best management practice by industry.

GTA recognises smaller operators in the grain supply chain are likely to have less resources (and possibly capabilities) than larger corporate entities when it comes to the development, and documentation of internal procedures, and small to medium enterprises (SME) may require support, and guidance to develop processes, procedures and policy to ensure compliance with CoR.

GTA has an objective to provide support through training for the SME and other interested participants. To provide this support to the SME, GTA, with Round 3 HVSI funding has introduced a workshop-based training program titled 'Practical Steps to CoR Compliance' delivered through a structured program of interactive workshops.

The genesis of the training program was feedback from GTA members. GTA, in late 2017 developed, and implemented a program to inform the grain industry of changes to the CoR legislation. This information was provided by:

- A member update (www.graintrade.org.au)
- A media release (refer www.graintrade.org.au) and
- Via regional and metropolitan seminars open to members and non-members.



Introduction (continued)

The seminars were designed to address existing industry gaps in CoR knowledge and compliance, as well as focussing on providing an overview of the requirements to comply with the revised CoR legislation introduced in 2018.

Seminar feedback highlighted industry concerns in relation to CoR; namely:

No	Industry Concerns
1	There is exposure to CoR risk in the grain supply chain due to SME who may not be aware of, and compliant with CoR obligations.
2	The level of volume of SME providing transport and handling services is high and is increasing.
3	A percentage of SME lack experience in the development of policy, procedures and the supporting monitoring and reporting processes to enable them to prove compliance with CoR.

Feedback established industry required a coordinated approach to support the SME towards compliance through the provision of practical training.

This training is considered beneficial to all participants in the grain supply chain and to other rural sectors and industries. GTA sought and received funding from the National Heavy Vehicle Regulator (NHVR) Heavy Vehicle Safety Initiative 2018-19: Round 3 (HVSF) to implement this training.

HVSF Round 5 Funding

The process undertaken under the Round 3 funding was successful. However, the ability to run the small interactive training courses was severely hampered due to the COVID-19 pandemic resulting in a decision to take the workshop-based training program and **establish and on-line training tool** to assist course participants to understand and to remain compliant to NHVR and CoR. The project also included an extensive marketing campaign to raise awareness of CoR in the grain industry and to promote the availability of on-line training.

Project Successes

Thanks to the HVSF funding GTA has been **successful in the refinement of GTA's CoR course material and manuals** and the development of **on-line sophisticated training modules** accessible on GTA's website.

This purpose designed course consists of 3 interactive online learning modules which take around 30 minutes each to complete. These can be done all at once, or over a period of time. The course can be completed on a mobile phone, tablet, or desktop.

At the successful completion of the three modules, participants from the grain industry will:

- understand the fundamentals of CoR,
- who is responsible and when,
- what part they play,
- where they fit, and
- where their obligations lie along the chain.

The course provides participants **specific industry focused learnings** on due diligence, risk management and safety management systems, and how to practically implement CoR in a grain business, or in a farm environment.

The modules provide helpful practical examples of how a course participant can use a systemic approach to managing safety risks to ensure the safety of a business's transport activities, so far as reasonably practicable.

Additional resources and activity booklets are available and course participants must complete a short assessment at the end of the modules. When course participants complete the training, they will have commenced the journey of ensuring a risk management framework is in place.



GTA Compliance Training Improves Awareness

It is important for all participants to remember for compliance to be effective, people need to know what is required of them.

It is therefore essential that for a business to ensure all your personnel are trained in, and fully understand all CoR-related policies and procedures.

Industry Supportive of the On-Line Initiative

Participation and feedback by GTA members and industry participants has been very supportive of the on-line training with 360 participants registering and progressing the full course material of the assessment program since the launch in late 2021.

The professionally developed on-line training has been widely accepted by industry and is available to all grain industry participants no matter where their business is located

Communication strategy initiative

As part of the process an extensive industry communications strategy was employed that:

- Defined and created a list of the target audience.

ACCESS TO THE TRAINING MODULES

Click on this [LINK](#) to access the GTA Practical Steps to Chain of Responsibility Workshops

Training Participants Feedback

The GTA on-line training is relevant to all parties in the grain supply chain in Australia. It supports risk management by highlighting the specific hazards and risks around heavy vehicle use in agriculture and assists participants by identifying measures that can be used to eliminate or minimise risk. Participants surveyed by GTA indicated the training is relevant and has resulted in immediate changes to business practices:

ANSWER CHOICES	RESPONSES
not relevant	0%
somewhat relevant	28.57%
very relevant	71.43%
TOTAL	

ANSWER CHOICES	RESPONSES
Yes	14.29%
No	7.14%
Already implemented changes	78.57%

GTA is pleased to announce that **93% of the participants** who completed the survey **recommend this training course to other grain industry stakeholders** as a way to better understand their CoR responsibility obligations



GTA Learnings and Project Evaluation

The Australian grain industry is a major contributor to the Australian economy and is forecast to have a value of \$25.4b for 2021-22, 33 per cent above the previous record value set in 2020-21. The industry is based on a structure of mainly numerous small to medium sized businesses with a small number of major entities.

This structure and the smaller operators in the grain supply chain are less resourced than larger corporate entities when it comes to the development, and documentation of internal procedures. These enterprises require support and guidance to develop the necessary processes, procedures and policy to ensure compliance with CoR. GTA recognised this and through the support of the NHVR and the HVSI funding has implemented specific support and training including the development of on-line sophisticated training modules.

Development of these training and support tools is only one component of what is required. GTA has recognised regular and extensive industry communications is required to reinforce and to remind industry participants of the importance of ensuring they have in place the necessary framework for CoR compliance and especially the training of staff.

GTA is committed to regularly reinforcing that industry participants and especially management have a responsibility to participants in the industry and to all members of the community in ensuring that the combined actions promote safety achieve the standards of heavy vehicle safety and compliance required under the HVNL and the various Heavy Vehicle National Regulations. This commitment is enshrined in the Grain Industry Transport Code of Practice.

Why Chain of Responsibility Compliance?

The Law has changed.

You are at risk if you are not compliant.

You need to prove you are compliant at all times.

Proof of compliance is required.

Prove you can comply by:

- Documents.
- Records.
- Actions.

Potential penalties if you do not comply.

Offence	Penalty	
Category 1 Offence For a person who is reckless as to the risk	Individual Maximum \$300,000 or 5 years imprisonment, or both	Corporation Maximum \$3,000,000
Category 2 Offence For exposure to risk of death or serious injury	Individual Maximum \$150,000	Corporation Maximum \$1,500,000
Category 3 Offence For breaches of the safety duty	Individual Maximum \$50,000	Corporation Maximum \$500,000

