

# **ALC Submission to the Inquiry into the Public Health and Other Legislation (Further Extension of Expiring Provisions) Amendment Bill 2022**

4 March 2022

Friday 4 March 2022

Committee Secretary  
Community Support and Services Committee  
Parliament House  
George Street  
BRISBANE QLD 4000

Dear Committee Secretary

The Australian Logistics Council (**ALC**) welcomes the opportunity to make a submission on the Public Health and Other Legislation (Further Extension of Expiring Provisions) Amendment Bill 2022.

ALC is the peak national body representing major companies participating in the freight logistics industry. ALC's policy focus is on delivering enhanced supply chain productivity, sustainability, efficiency and safety.

Freight affects every Australian, every day, everywhere. Common goods purchased by Australians such as food, clothing, household appliances and medicine all need to be transported by freight operators.

The COVID crisis and recent extreme weather events have highlighted the importance of a freight chain capable of efficiently moving things as basic as food, essential groceries and personal hygiene products to places such as supermarkets and emergency response points.

Freight and logistics operations are affected by local government planning regulations related to operating hours, vehicle size and noise limits. There are 537 local councils in Australia all with their own regulations, which makes doing business incredibly complex for a national operator. Australia is after all a single, national economy.

Current curfew legislation and regulation is archaic and not suited to the changing demands of modern society. Australia's freight task is set to increase by 60% by 2040, this task cannot be met without the ability for freight and logistics operations to operate in a 24/7 manner.

Furthermore, with the construction of the Inland Rail, it is critical freight moves in a continuous manner to reap the productivity uplift of this significant, nation building piece of infrastructure and the net economic benefit.

The ability to make truck deliveries outside of peak hours long-term also assists in terms of easing congestion, as more deliveries could be spread across the day. ALC expect this will be more important than ever as people return to CBDs via private vehicles and avoid public transport. Infrastructure Australia's modelling estimates that congestion cost the Australian economy \$19 billion in 2016 and that without continued infrastructure investment in our cities, this cost will more than double by 2031 to reach \$39.8 billion.



During the height of the pandemic, National Cabinet made the sensible decision to temporarily relax freight curfews and delivery restrictions. ALC thank the Queensland Government for extending these practical and pragmatic measures which have been instrumental in ensuring essential food, groceries and supplies reach Queenslanders.

In June 2021 ALC undertook research with CT Group on constituent sentiment to the permanent relaxation of curfews. Key research findings:

- More than 60% of respondents said they would be in favour of removing curfews to enable smooth movement of freight goods
- Noise concerns are not a primary issue, with only 1 in 7 respondents feeling that transport noise levels have increased since the beginning of COVID-19
- Only 6% are aware of temporary changes to curfew regulations due to COVID-19
- Only 2% feel as those noise levels have increased due to freight transport, like trucks.

In terms of managing curfew regulations, the research found:

- 72% of respondents feel the state government is best placed to manage the regulation of freight and the supply chain, with 71% of these supportive of this change
- In contrast, just 7% of respondents feel local government should manage these regulations

The NSW Government recently made the decision to keep the temporary planning measures pertaining to curfews in perpetuity providing certainty for business and enabling more efficient operations of distribution centres and the ability to optimise freight routes and modality. The onus is also on the supply chain to demonstrate best practice when it comes to managing relationships with neighbours through noise mitigation, adoption of new technologies such as quiet pallet jacks and upgrading of fleets to zero emission vehicles.

The Queensland Productivity Commission has integrated into the Queensland Treasury to establish the [Office of Productivity and Red Tape Reduction](#) with a focus on:

the economic challenges facing Queensland in a post-COVID world, developing policies to promote economic recovery.<sup>1</sup>

As Queensland recovers from the devastating weather events, full retail shelves will benefit all Queenslanders. The ability to efficiently move freight improves productivity outcomes and in time reduces prices, without necessarily reducing residential amenity.

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<sup>1</sup> <https://www.qpc.qld.gov.au/>

**ALC recommends:**

- 1. The current temporary measures be retained in perpetuity.**
- 2. The Office of Productivity and Red Tape Reduction:**
  - (a) conduct a whole of government evaluation of the practical effect of the relaxation of regulatory changes that are contained in the Bill, such as amending the effects of environmental legislation to permit the movement of freight without, for example, the imposition of delivery curfews; and that**
  - (b) the changes be retained unless it can be shown they have no net public benefit; and**
- 3. the Government report periodically to the Parliament on progress of this review.**

ALC welcome the opportunity to respond to the Inquiry into the Public Health and Other Legislation (Further Extension of Expiring Provisions) Amendment Bill 2022. If you have any questions, please contact Rachel Smith, Head of Government and Policy on [REDACTED] or [REDACTED]

Yours sincerely



Brad Williams  
Chief Executive Officer