

Draft Shire of Kulin Submission – MRWA AMMS Network Sustainability Review

To: Main Roads Western Australia, Heavy Vehicle Services

Subject: AMMS Network Sustainability Review

The Shire of Kulin welcomes the opportunity to respond to the consultation announced by Main Roads WA Heavy Vehicle Services on 2 October 2026 regarding the proposed Accredited Mass Management Scheme Network Sustainability arrangements, described as a replacement for the former CA07 access condition approach.

The Shire supports the objective of protecting road infrastructure from extraordinary wear associated with higher-mass vehicle movements and recognises the significant productivity benefits AMMS provides to Western Australian industry. The comments below are intended to assist Main Roads WA in developing a framework that is practical, proportionate, consistent and capable of being administered, complied with and enforced in real operating conditions.

Scope of the Review

The Shire seeks clarification as to why the review is confined to AMMS Level 2 and 3 when road capacity, pavement condition, freight intensity, route suitability, cumulative movements, seasonal vulnerability, Road Manager involvement and compliance also arise across the broader Restricted Access Vehicle Network.

Main Roads is encouraged to consider whether the proposed arrangements should form part of a broader and more integrated RAV network sustainability framework, rather than create an additional stand-alone administrative layer for AMMS operations.

Different Freight Tasks

The proposed Road Maintenance Agreement model appears suited to sustained and identifiable freight tasks involving a defined generator, route, tonnage and operating period, including mining, quarrying, major industrial haulage and major construction.

Agricultural freight can differ materially. Grain, liquid and granular fertiliser, hay, fodder, livestock and other movements may involve multiple producers, operators, origins, destinations and routes, with intensity changing between seasons and throughout the year. The final framework should recognise these differences and avoid a one-size-fits-all approach.

Freight Generator and Allocation of Responsibilities

A clear and workable definition of the Freight Generator is fundamental. In complex supply chains, the parties producing, purchasing, arranging, transporting and receiving a commodity may all differ.

The Shire recommends that Main Roads test the definition against representative agricultural, mining, construction and industrial scenarios and provide a State-wide responsibility matrix identifying who is responsible for application, notification, agreement negotiation, tonnage reporting, financial or in-kind contributions, road-impact monitoring, vehicle compliance, enforcement and response to breaches.

State-wide Consistency and Local Discretion

Road Managers possess essential knowledge of road construction, condition, maintenance history, seasonal vulnerability and freight activity. This knowledge must be retained, while avoiding materially different administrative requirements between adjoining Local Governments.

The Shire supports clear State-wide definitions, common assessment criteria, common documentation and transparent materiality thresholds, with appropriate Road Manager discretion where genuine local circumstances justify a different response.

Materiality, Timing and Administrative Burden

Formal agreements should target freight tasks presenting a material and identifiable additional road risk. Relevant factors may include tonnage, vehicle movements, duration, frequency, AMMS level,

route length, pavement capacity and condition, existing freight volumes, seasonal conditions and cumulative impacts.

The proposed negotiation period may be workable for sustained freight but less effective for a short, intensive task that could be substantially completed before an agreement is finalised. The framework should provide a timely response where a genuine short-term asset risk exists.

Applications, confirmation letters, negotiations, reporting, auditing, invoicing and renewals should remain proportionate to the risk being managed and realistically achievable for regional Local Governments and industry.

Compliance, Monitoring and Enforcement

Road Maintenance Agreements establish administrative and asset-management arrangements but do not ensure vehicles are operating within approved mass limits. Main Roads HVS is requested to clarify how actual axle group loading will be monitored, the on-road compliance activity and resources envisaged, whether activity will be targeted to higher-risk routes and seasonal peaks, the role expected of Road Managers, how outcomes will be shared, and the response to repeated non-compliance.

Administrative compliance should not become a substitute for physical compliance. A credible network sustainability framework requires both elements to operate together.

Working Group Representation and Practical Testing

The Shire requests details of the Committee or Working Group membership and Terms of Reference, including representation from WALGA, regional Local Governments, transport operators, Freight Generators and the agricultural, mining, quarrying, construction and other relevant freight sectors.

Direct involvement from participants with practical, grass-roots experience will assist in ensuring the arrangements can be implemented and managed on an ongoing basis. The framework should be scenario-tested before implementation, including freight tasks that cross multiple Local Government boundaries.

Potential Tiered Approach

The Shire recommends consideration of a proportionate, risk-based model that distinguishes between routine AMMS operations requiring minimal additional administration, seasonal or high-intensity freight requiring notification or targeted conditions, and extraordinary or sustained freight tasks requiring a formal Road Maintenance Agreement or maintenance contribution.

Conclusion

The Shire supports Main Roads WA's network sustainability objective. The success of the final framework will depend on clear responsibilities, objective thresholds, recognition of different freight sectors, State-wide consistency balanced with local knowledge, proportionate administration, effective compliance and enforcement, and meaningful Local Government and industry involvement.

The Shire would welcome continued engagement with Main Roads WA, Heavy Vehicle Services, WALGA, industry and other Local Governments in refining and practically testing the proposed arrangements before implementation.

Yours sincerely,

Alan Leeson
Chief Executive Officer
Shire of Kulin