

November 2021

CICA Position Paper & Dashboard



The Crane road access crisis in Queensland

An evidence based evaluation of the barriers to efficient road access for mobile crane owners, operators and users in Queensland.

At a glance

The Crane Industry in Queensland

CICA has over 125 member organisations in Queensland and there are 374 mobile cranes registered for use on roads that require permits for routine crane operations.

Whether lifting materials for a commercial or residential building in an urban environment or building wind farms and maintaining mining equipment in regional areas, mobile cranes are required to complete the majority of infrastructure and mining projects in Queensland.

The crane industry's contribution to the QLD economy cannot be understated. Without safe and efficient access to job sites for cranes, the QLD construction industry faces considerable challenges resulting in higher costs and project delays.

Cumulative number of permit applications by month in QLD and NSW

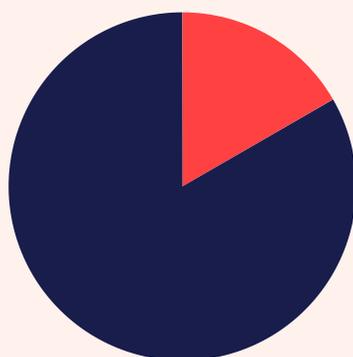


CICA Survey Findings

CICA receives a disproportionate number of calls from its QLD members seeking assistance. CICA sent a survey to members to qualify the steady increase in complaints from Queensland. The results are depicted below.

CICA receives 30 calls per month on average from members complaining about TMR

Reasons for complaints



■ Onsite issues (16.67%) ■ Road Access (83.33%)

Permit disparity

June '20 - September '21

QLD permits

NSW permits

7914

526

TMR permits in Queensland - an overview

There are significantly more cranes operating in New South Wales than Queensland, however the volume of road access permits submitted for cranes in Queensland was **1405%** higher than the number of permits submitted in New South Wales.

The administrative resources required for compliance in Queensland is not sustainable and is having significant economic repercussions.

This situation has become untenable, as evidenced by the data and the fact that TMR are now breaching legislated timeframes under Heavy Vehicle National Law.

The Crane Industry Council is calling on the Queensland Government to evaluate the data and rectify this issue as a matter of urgency.

Dashboard

Applications to renew an existing Qld permit

77%

Time spent waiting for Qld permits

365
Cumulative
Years

Percentage of QLD permit applications which are refused

< 1%

Percentage of TMR renewal applications exceeding legislated timeframe for response

33%

Findings



Finding 1

The existing road access permit system in Queensland is inefficient and resource intensive.



Finding 2

The available data validates industry's concerns and calls into question TMR's asset protection policies.



Finding 3

The compliance burden on QLD mobile crane owners is significantly disproportionate to those of other states.



Finding 4

The current system is crippling the mobile crane industry in Queensland.

The crane road access crisis in Queensland

Executive Summary

The Crane Industry Council of Australia (CICA) represents the needs of crane owners across the country with the state and local road managers as well as key stakeholder groups that influence safe and efficient road access.

As crane fleets nationalise, it is imperative that industry operate across jurisdictional borders. Unfortunately, there are stark differences in the road access performance of some states when compared to others, these have been brought to the attention of CICA through a series of member complaints and requests for assistance.

The QLD crane industry has a strong history of collaboration across Queensland with the NHVR, TMR and the LGAQ. The goal has been to increase awareness of mobile crane operations and improve road access to enable vehicles to efficiently get to construction sites across the state to conduct lifting operations.

Local road access in QLD is currently working well via the use of pre-approvals, however, the use of TMR's infrastructure is problematic for crane owners - particularly when it comes to permit durations and turnaround times. In recent years, road access for mobile cranes in QLD has become substantially more challenging, especially following changes to the management of crane access, in particular, the focus on 'single trip' 35 day permits for routes and structures across the TMR network.

Obtaining these permits requires an application through the NHVR portal at a cost of \$76 per application. This application can take many weeks to process and is only valid for a single use. Crane owners in QLD are understandably asking questions about the veracity of TMR's asset protection policies and have sought CICA's assistance to establish a path forward.

In response, CICA made multiple approaches to TMR to clarify industry's concerns with the access controls, and then worked with the NHVR to source data (through the permit portal) on the road access situation in QLD to quantify the issues raised. A comparison with NSW was made as a point of reference.

The results have highlighted major disparities in performance between the two jurisdictions. It is apparent that the complexity and cost associated with operating cranes in QLD, is exponentially higher when compared to NSW.

In short.

- National crane companies experience huge disparities across States in Australia
- The majority of complaints / requests for assistance to CICA come from QLD crane owners
- In response CICA has sourced data from the NHVR to assess the veracity of the complaints
- TMR's asset protection policies do not stand up under close scrutiny

The crane road access crisis in Queensland

Executive Summary

The following report highlights the difficulties associated with road access for mobile cranes on the TMR network and outlines an urgent need to review and improve the current system.

Discussion includes;

- The sheer volume of permit requests in QLD
- Increasing numbers of permit renewals that require re-assessment
- The issue of TMR's non-response to large numbers of permit requests
- Extremely slow permit approval times
- The constraints of a 35-day single trip road access permit
- Wait times and TMR requests for extension of assessments hampering industry ability to get to worksites

Analysis of the data verifies industry concern that TMR's permit turnaround performance is far below that of other states and the current road access approach for mobile cranes is unsustainable and requires urgent review.

“The mobile crane fleet is relatively small but fulfills a critical role for a variety of industries. Construction and mining activities rely on cranes at a state and local level, meaning cranes require the flexibility to get to the worksite in a timely and efficient manner.”

Brandon Hitch
CICA CEO

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“The responsibility of a company is to serve the customer.
The responsibility of leadership is to serve their people so that their
people may better serve their customers.
If leaders fail to serve their people first, both customer and company
will suffer.”

Simon Sinek
Author of 'Start with Why'

The crane road access crisis in Queensland

Introduction

In Australia the public road network is managed by a variety of entities including state road transport authorities, local councils and third parties. The Department of Transport and Main Roads (TMR) controls 33 384 km of the road network in QLD this includes approximately 6500 bridges and major culverts. Transport for New South Wales (TfNSW) are responsible for approximately 21 000 km of the road network in NSW including over 5000 bridges.

Whilst the Australian road network is vast, many of the materials used and approaches to road asset management are common across states. Utilising shared knowledge to manage road assets, is in the best interests of the Australian community. The crane industry supports the wider heavy vehicle industry's views on the consistency of application of rules and regulations across Australia to enable certainty of compliant road access.

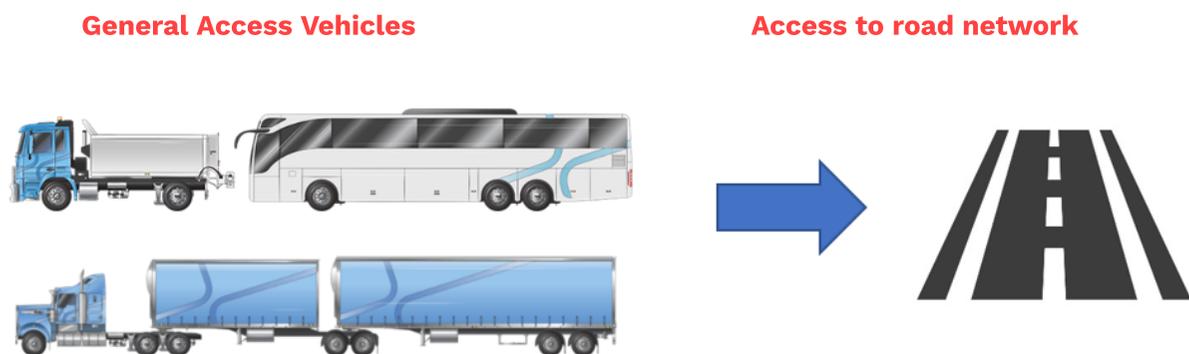
CICA has a long history of working with State and local road managers across the country on issues relating to road access and is therefore uniquely placed to comment on the consistency of road access for cranes across Australia. Crane owners in QLD are voicing extreme frustration with the road access approach adopted by TMR.

In short.

- Australia has a vast road network but there are many commonalities between States
- TMR manages 33 384km of road and approx. 6500 bridges in QLD
- TfNSW manages 21 000km and approx. 5000 bridges in N.S.W.
- CICA works with State and local road managers in every Australian jurisdiction

The use of road access permits as the primary means of access control is seen by the industry as extremely inefficient and wasteful.

Industry acknowledges that cranes do not perform the same as trucks on the road, and road managers can and should implement reasonable access controls on the network to facilitate safe and efficient use for all vehicle types.



Special Purpose Vehicles (such as mobile cranes) do not meet the mass and dimension requirements for general access to the road network in Australia. Therefore, unlike General Access Vehicles, exemption to these requirements is needed for mobile cranes prior to road use. These exemptions are issued by the National Heavy Vehicle Regulator (NHVR).

The crane road access crisis in Queensland

Introduction

Special Purpose Vehicles



NHVR Exemption



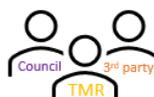
Access to road network



NHVR



Road managers



In QLD, all terrain mobile cranes with 3-axles or greater require a permit to access a significant portion of the road network. This contrasts with other states such as NSW where an exemption is provided to most of these vehicles via a notice, which removes the need for vehicle specific permits.

Most of the permits in QLD are vehicle and route specific, have a maximum duration of 35 days and are only valid for a single trip. The limited nature of these permits is a result of Department of Transport and Main Roads (TMR) policy on managing structures (bridges and major culverts). This policy is unique in Australia and has resulted in significant difficulties for the crane industry.

To obtain an overview of the permit situation in QLD for these vehicles and how it compares to other states, the NHVR provided The Crane Industry Council of Australia (CICA) with data detailing the permit applications submitted for mobile cranes in both QLD and NSW.

Obtaining an Overview of Permits



1 NHVR

The National Heavy Vehicle Regulator (NHVR) provided CICA with permit application data for mobile cranes



2 Time Period

1 July 2020 - 30 September 2021



3 Comparing States

Data from QLD and NSW was used to compare permit volumes

This data is used to quantify the consequences of the TMR policy for these vehicles and compare permit volumes with NSW which has a more progressive approach to road access.

The data is also used to demonstrate the administrative burden associated with the policy and identify whether the policy is resource effective in its approach to risk management.

Analysis

State	Category	Vehicles
QLD	Category 1	75
	Category 2	266
	Category 3	33
NSW	Level 2	93
	Level 3	183
	Level 4	206
	Level 5	10
	Level 6	8

Table 2.1: Number of mobile cranes in NSW and QLD [Data Source](#)

The mobile crane fleet is relatively small but fulfills a critical role in the construction industry. A large amount of construction activities rely on cranes at a state and local level, meaning cranes require the flexibility to get to the worksite in a timely and efficient manner.

While there are significantly more cranes in NSW, a disproportionate number of permits originate in QLD, due to TMR’s reliance on a permit-based access approach.

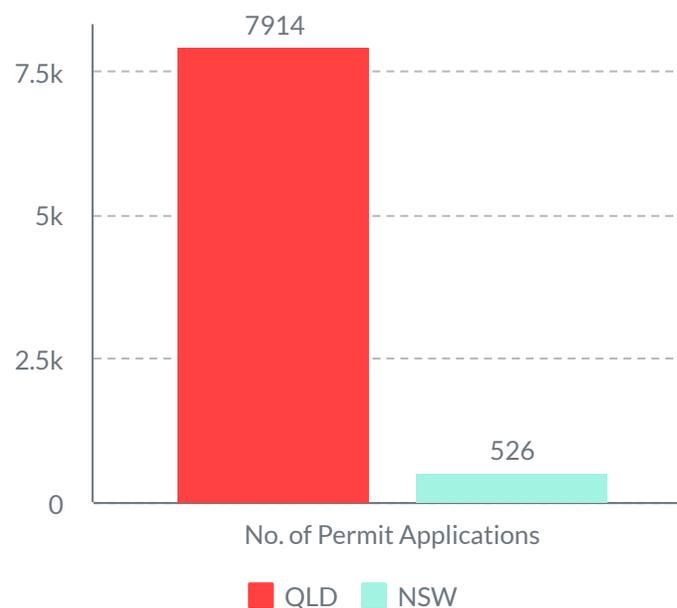


Figure 2.1: Total number of permit applications submitted in QLD and NSW [Data Source](#)

The QLD mobile crane fleet is smaller than that of NSW, yet there are **1405% more permits applied for by crane owners in QLD.**

Analysis

Crane owners are forced to apply for a permit (**can take up to and over 28 days**) at the current cost of \$76 per application.

Using the current rate of \$76 per application, the cost to industry of 7973 QLD applications would be upwards of **\$600 000 compared to under \$40 000** for 526 NSW applications.

TMR are fining crane owners for non-compliance, without due consideration of the burden placed upon business.

The majority of the permit requests are for **'single trip'** crossings, valid for a period of 35 days from the date of issue. The existence of these permit types is interpreted by industry as a **disregard for the needs of crane owners** by TMR.

Duration Type	Total Number
Single Trip	6905
Period Permit	392
Other	276
All Types	7573

Table 2.2: Permit applications by duration type (QLD) [Data Source](#)

Table 2.2 further highlights the **compliance burden** placed on crane owners by TMR in QLD.

6905 'single trip' permits were processed by the NHVR, which when compared to NSW's 526 (see Figure 2.1) permits (in total) shows that the compliance burden in QLD is significantly disproportionate to those of other states.

TMR are the **only state-based jurisdiction that use 'single trip' permits** as their main source of access control.

CICA and the crane industry have and continue to question the purpose and effectiveness of TMR's road access model for mobile cranes.

The compliance burden in QLD is significantly disproportionate to those of other states.

Analysis

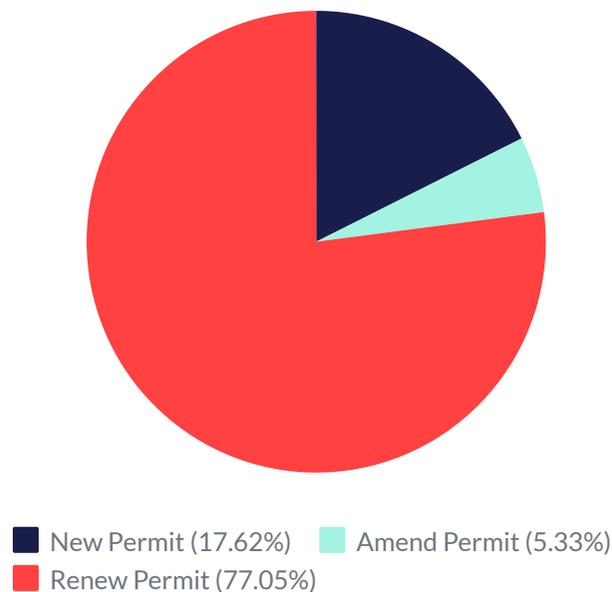


Figure 2.2: Single trip permit applications by application type (QLD) [Data Source](#)

Of the total number of permit applications, **77% of all 'single trip' permits are permit renewals**. This means that the previous permit has been approved and used, however the next permit requires individual assessment prior to being granted.

Each renewal application is individually assessed by TMR and there is no recognition of previous access granted to the same or similar cranes. Industry considers this as a **waste of time and resources** for the NHVR, TMR and crane owners.

Given the volume of structures in QLD it is **not possible for TMR to inspect every asset** every time road access is requested.

Industry has been given **no explanation** as to why each and every single trip application requires an individual assessment.

“Normally site will aim to pre-plan crane and heavy transport work allowing enough lead time to arrange transport permits etc., however, a major risk is apparent when we experience unplanned failures of Dragline/Excavator Buckets or Ultraclass Mining Truck Bodies. We require cranes and transport immediately in order to maintain continued operation of Tier 1 mining assets.

The current system does not allow for this situation and could potentially cause delays for several weeks whilst the transport permits are approved. The financial cost of such a delay is substantial and may also effect operations of downstream customers who rely on our product to operate. We would strongly support any improvement or streamlining of the current process to reduce transport permit lead times especially on pre-determined/repeated travel routes where conditions are known in advance.”

Batchfire Callide Mine

Analysis

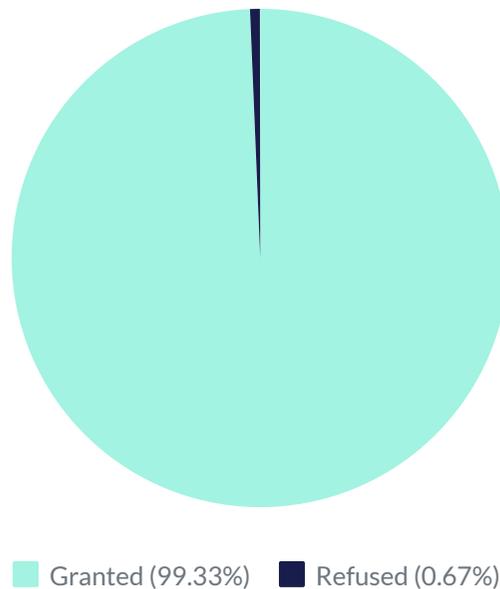


Figure 2.3: Single trip permit applications by TMR response (QLD) [Data Source](#)

This is perhaps the **most concerning** aspect of the data collected. Figure 2.3 indicates that while industry applied for 6905 permits at a cost of \$76 per application, **access was granted over 99% of the time.**

The **wait time** associated with the granting of the permit application ranges from **16.3 to 31.3 days** (see Figure 2.6). When this significant burden on industry is coupled with the extremely low refusal rate for applications, it highlights the ineffectiveness of the asset management approach taken by TMR.

The **current approach** to the management of mobile cranes in QLD appears **wasteful and to not properly consider the needs of business** and the contribution mobile cranes make to the QLD economy.

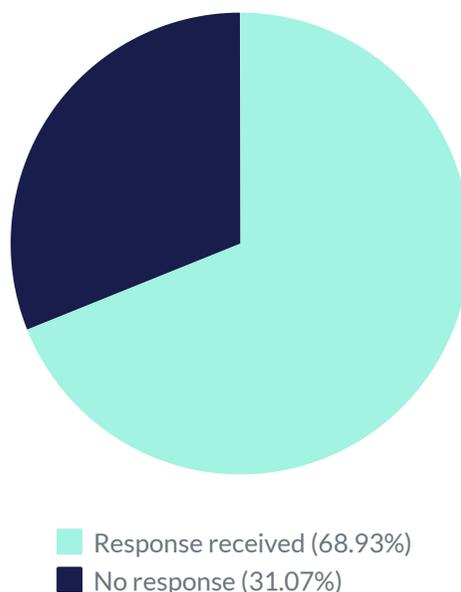


Figure 2.4: TMR response to single trip permit renewal applications [Data Source](#)

Analysis

Industry holds concerns regarding the volume of 'no response' outcomes for permit applications. Under the HVNL if a road manager does not respond to a permit renewal request it is automatically granted (after a period of 14 days if an extension of time is not granted).

In 31% of cases, TMR did not respond to the request within the legislated timeframe. This resulted in applicants having to wait a minimum of 14 days for an application be automatically granted via the NHVR portal without any assessment by TMR.

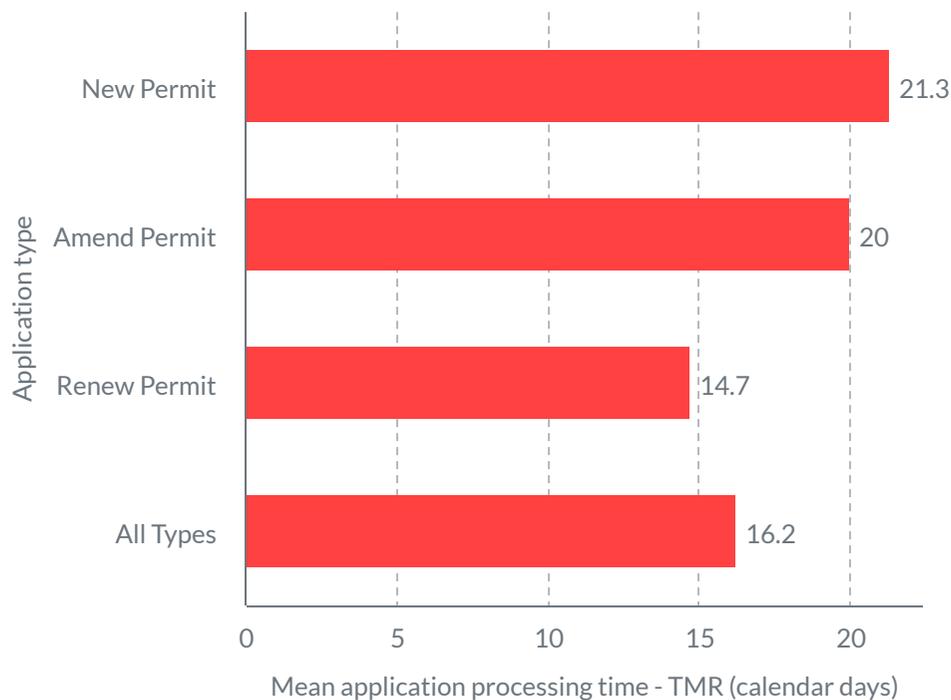


Figure 2.5: TMR processing time for single trip permit applications by application type [Data Source](#)

Figure 2.5 shows the wait time for crane owners to receive a permit from TMR counted in calendar days. The **TMR wait time is additional to the NHVR processing time** which can vary from 2-6 days.

Owners are waiting weeks prior to receiving a response from TMR.

These timeframes make it **extremely difficult** for crane owners to plan and operate a **compliant business** when it comes to road access.

These wait times are contributing to the increasing cost of construction in QLD and are hampering industry's ability to deliver construction projects on time and on budget across the state.

Analysis

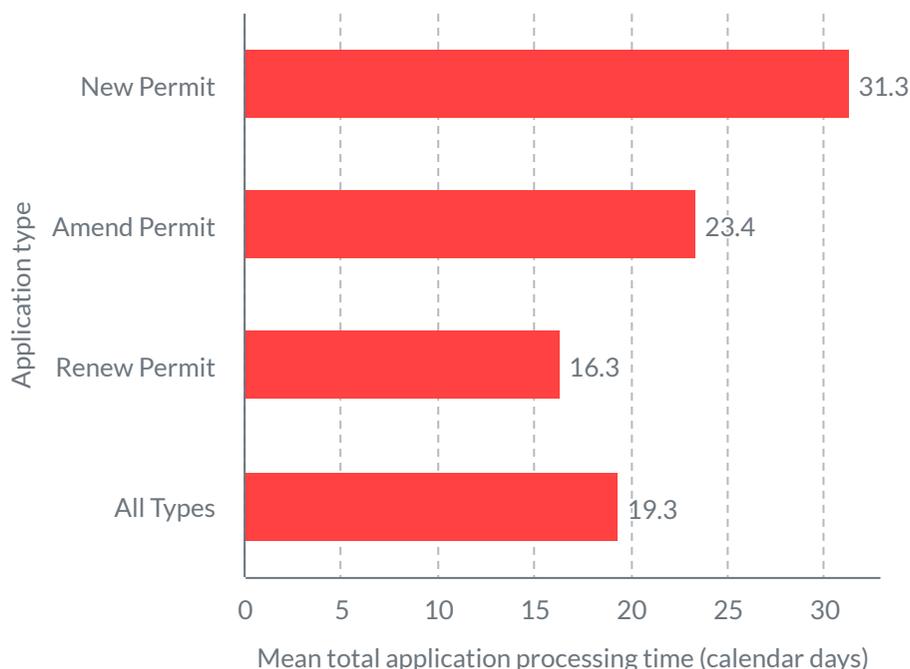


Figure 2.6: Mean total processing time for single trip permit applications by application type (QLD) [Data Source](#)

As a permit application also requires processing by the NHVR prior to TMR undertaking their assessment, Figure 2.6 shows the mean processing time for the entire assessment process.

The HVNL states that road managers have 28 days to respond to a permit request. The average of 31.3 days for a new permit application in QLD puts into question the current system and deliverables of TMR. Due to the long lead time and inability to apply for multiple trip permits, industry needs to purchase permits ahead of time to ensure they have the flexibility to meet customer demand. This results in large numbers of permits not being used despite being purchased and processed.

CICA believes that the **current TMR approach is unsustainable** and requires immediate review.

Application Type	Total Number.	Mean total application processing time (Days)	Total cumulative processing time (Years)
New Permit	1217	31.3	104.5
Amend Permit	368	23.4	23.6
Renew Permit	5320	16.3	237.2
All Types	6905	19.3	365.2

Table 2.3: Cumulative processing time for single trip permit applications by application type (QLD) [Data Source](#)

Analysis

Application Type	Total Number.	Extension of time granted (TMR)	% of total with extension of time granted
New Permit	1217	209	17%
Amend Permit	368	19	5%
Renew Permit	5320	1666	31%
All Types	6905	1894	27%

Table 2.4: Single trip permit applications with an extension of time granted to TMR by application type (QLD) [Data Source](#)

Compounding the wait time issue for single trip permits, TMR have increasingly been requesting additional time to conduct assessments of permit applications. This forces **crane owners to wait unreasonable periods of time** before receiving a response.

If TMR requires additional time in 27% of cases, industry has **justifiable concerns** that TMR does not have the capacity to conduct the assessments within the conditions outlined in the HVNL.

The previous education campaigns delivered to QLD crane owners in collaboration with the NHVR, TMR, CICA and the LGAQ are irrelevant as the **timeframes discussed with industry are not being met by TMR.**

Application Type	Total Number.	TMR consent response exceeding legislated timeframe	% of total which exceed legislated timeframe
New Permit	1217	161	13%
Renew Permit	5320	1760	33%

Table 2.5: Number of single trip permit applications for which TMR has exceeded the legislated timeframe for a response [Data Source](#)

Table 2.5 reiterates industry's concern regarding TMR's ability to improve permit turnaround times. Understanding that some permits are more complicated than others, the table indicates that in 13% of cases, TMR exceed the legislated period for new permits. The situation is worse for permits being renewed, with over **33% of all applications exceeding the legislated period.**

Analysis

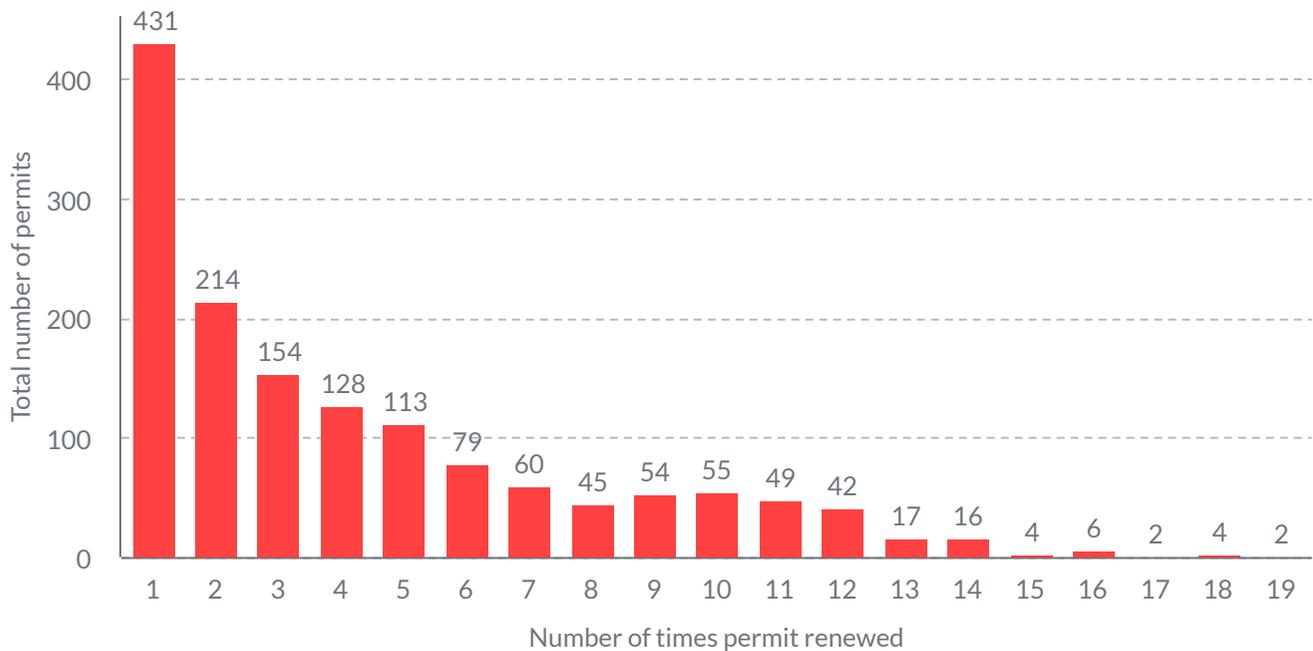


Figure 2.7: Number of times single trip mass or dimension exemption permits are renewed (QLD) [Data Source](#)

Figure 2.7 demonstrates the excessive frequency at which permits are renewed in QLD. As previously discussed, permits are granted in over **99% of cases**. While the ‘success’ rate might be high, industry wastes an extraordinary amount of time and money complying with TMR’s single trip permit approach.

A staggering **830 permits were renewed 3 or more times**. At the far end of the scale, two permits were renewed a total of 19 times. A sound explanation has not been provided to industry as to why TMR requires owners to continually renew permit applications every time they want to cross the same structure or use the same route.

The lack of preapproved access for mobile cranes in QLD and reliance on a single trip mechanism for the management of road access, is **out of step** with all other state and local road managers across Australia.

The current system is crippling the mobile crane industry resulting in excessive red tape, compliance fatigue and higher costs across the QLD construction industry.

Conclusion

While the management of state road assets is a complex task, the vastly different approaches to the management of bridges and culverts from state to state is a considerable challenge for the crane industry. The data demonstrates that TMR's methods of access control in the form of permits has resulted in considerable cost and inconvenience.

The large volume of permits for mobile cranes in QLD compared to NSW suggests that TMR are managing structures in a unique, resource intensive manner. The fact that 1405% more permits originate in QLD when compared with NSW is of concern, when coupled with a 99% 'success rate' for approved permit requests, this appears to be a considerable waste of both industry and taxpayer resources.

The reliance on 35-day single trip permits by TMR is unworkable for many QLD crane owners, as a permit cannot be renewed until it is used, meaning owners must apply for multiple 'single trip' permits in advance. The TMR processing time is inadequate for industry needs resulting in additional permits being purchased and processed 'just in case' they are required. In some cases, this means that up to 40% of permits paid for, processed and granted are not used.

The data in this report does not provide insight into the reason for TMR's processes, however, the number of structures is comparable between the two states and bridge design standards apply nationally in Australia, so differences in infrastructure between NSW and QLD do not solely account for the vast difference in permit volumes.

As the data demonstrates that in 99% of instances crane owners are approved for access in QLD, industry questions the veracity of the TMR bridge assessments and why a more streamlined solution is not available. Currently, road access for cranes in NSW, VIC, TAS, WA and SA is vastly superior to that of QLD.

The highly repetitive 35-day single trip process imposes a significant resource burden on TMR and the NHVR as well as industry, the flow on effect is slower permit processing times in other states. All permit requests must go through the NHVR for initial processing prior to distribution to road managers. All heavy vehicle owners across the country are waiting longer for their permits to be processed because the NHVR permit queue consists of a disproportionate number of permits for TMR. The unsustainable approach to asset management in QLD appears to also have national implications.

As result of TMR's refusal to accept 'Multiple Trips' permit applications, the data verifies that the QLD crane industry has paid over \$600k for access permissions over the reporting period, whereas their NSW counterparts paid around \$40k with an increased volume of vehicles.

The lack of certainty of compliant access for QLD crane owners is reaching crisis point. The analysis in this report highlights the inefficiency of the current system for the management and control of routine crane operations. The current permit volumes are increasing costs, wait times and compliance fatigue.

In short

- CICA recognises the management of state road assets is complex, however, the current system is unworkable and in need of urgent reform.

Recommendations

CICA remains committed to a **safe and progressive crane industry** and the QLD crane industry remains willing to collaborate with TMR to improve both access and compliance while protecting vulnerable assets where required.

The following short, medium and long term recommendations have been collated in collaboration with CICA and the QLD crane and construction industries to address the current QLD crane access crisis;



Short Term

1. Improve TMR permit processing times, including approaches to address the wasted time (14 day minimum) associated with automatic permit renewals and requests for time extensions
2. Introduce multi trip permits (or preapproved access) for road access that is routinely requested and approved.
3. Improve transparency regarding the forward works program for TMR structures to enable better road access planning and coordination.
4. Review the TMR Category 3 policy for crane access, including the use of 35-day single trip permit as the primary means of road access control.



Medium Term

5. Increase the use of notices and preapprovals in line with other state jurisdictions to remove the need for permits for routine crane operations.
6. Conduct a review of crane category types in QLD moving to a more granular access solution for specific vehicle types, as currently any vehicle over 5 axles is considered one category (Category 3) by TMR resulting in 35-day single trip road access for each road movement.



Long Term

7. Adopt a road access model similar to the HVAMS model being utilised in Tasmania, where road access is tailored to the specific mass and dimensions of the vehicle and an approved network is provided virtually instantly without the need for a permit.

This data driven, tailored approach facilitates access for industry whilst allowing the state road manager to monitor vulnerable assets. CICA is currently working with other states on the feasibility of a wider rollout of the Tasmanian model across Australia.



**One voice for the
Australian crane
industry**

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