



ALDI Stores

(A Limited Partnership)
ABN 90 196 565 019

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CORPORATE

15 October 2019

Senator Glenn Sterle
Chair of Rural and Regional Affairs and Transport References Committee
Shadow Assistant Minister for Road Safety
Senator for Western Australia
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Dear Senator,

I thank the Rural and Regional Affairs and Transport References Committee (the Committee) for the opportunity to provide a submission to the Inquiry into the Importance of a viable, safe, sustainable and efficient road transport industry (the Inquiry).

We take a safety-first approach across the freight to plate supply at ALDI Stores (ALDI) and we fully support the work and the Committee in undertaking this Inquiry. We see any road incident as one incident too many and support the work of industry and governments in working towards zero incidents.

We see our transport team of more than 530 transport operators as a key link in ensuring our customers have access to ALDI products in over 540 stores across the country. Every day they embark from one of our eight distribution centres to deliver these products in a safe and timely manner. We train, pay and provide our drivers with superior conditions. On average, our transport operators are paid more than 30% above award rates of pay. Our commitment to safety and fairness extends beyond our own employees and applies across our supply chain, undertaking measures to ensure all of our suppliers and logistics providers meet their requirements under the Heavy Vehicle National Law (HVNL) and Fair Work Act.

As a quiet achiever, ALDI does not devote a lot of resources to seeking publicity for promoting good safety and employment practices. We don't see this as something that we should seek recognition for, but rather something we should do because it is the right thing to do. This has left us, at times, vulnerable to criticism for not being open and transparent about how we do things and how we contribute to improving safety and viability across our supply chain.

We have been unfairly targeted by some groups within the transport sector due to a lack of understanding about the importance we place on safety. We have had inaccurate assertions levelled at us in relation to how we pay our drivers, maintain our vehicles, and deal with our suppliers. We hope this submission will shed some light on the good things we do to make sure that Australians employed directly or indirectly in our supply chain, return home safely and get paid well.

This submission:

- Directly addresses the Terms of Reference in this inquiry related to the ALDI business.
- Presents a short summary of the ALDI business and our contribution to the Australian economy.

- Highlights the work we do to ensure safety, fair pay and conditions across our supply chain.
- Outlines our commitment to our people and the Australian community.
- Offers our views on how to improve safety across the road freight supply chain.

If you wish to discuss this submission further please contact Jenna Gatt

Yours sincerely,

Damien Scheidel
Managing Director of Corporate Logistics, ALDI Australia

EXECUTIVE SUMMARY

Since the commencement of operations in 2001, ALDI Australia has grown to be a significant contributor to the economy and a significant player in road freight transport. Our business model revolves around providing high quality products at a significant discount to the market. These savings do not come at the expense of safety or fair pay for our employees and the employees of our suppliers, but rather by finding efficiencies throughout our business. We have always placed safety at the forefront of our business.

The measures ALDI take across our vehicle fleet and in our supplier network to ensure road safety best practice include:

- The implementation of a Heavy Vehicle Transport Services Safety and Corporate Responsibility Charter.
- Development of a Tender Audit Checklist for all third and fourth party logistics providers, requiring proven compliance during tender for selection as an approved supplier.
- Auditing the performance of all our domestic freight providers to ensure compliance with the law.
- Participation in the National Heavy Vehicle Accreditation Scheme (NHVAS), and the undertaking of an annual audit under the NHVAS to ensure we are complying with applicable requirements.
- Driver training programs and trainers employed full-time at all ALDI distribution centres, building a safety culture in the ALDI fleet.
- Ensuring our fleet is equipped with new and safe vehicles.
- Comprehensive fatigue management practices.
- Ensuring there is a full-time mechanic and a rigorous fleet maintenance program at all distribution centres.
- Technology (Electronic Work Diaries and fatigue management systems)

We value and look after our people across all areas of the business and have been recognised as an employer of choice in industry awards.¹ We support our employees, providing them with comprehensive training to have an impactful and successful career at ALDI.

We believe in fair pay for work and employ our transport operators under Enterprise Agreements approved by the Fair Work Commission. The rates of pay set out for our transport operators compare favourably to the award, on average our operators earn more than 30% above the Road Transport and Distribution Award of 2010.

Under our Enterprise Agreements we provide for up to 50 ordinary hours per week which enables superannuation and leave to be accrued over these hours rather than a standard 38-hour week. Our transport operators receive five weeks of paid annual leave a year irrespective of work performed as shift work. We do not employ a casual workforce. Unless our transport operators elect to have part time arrangements, we provide guaranteed 40 or 45-hour work weeks and labour hire recruits are converted to permanent employees on average three months after their engagement.

We work to keep our people safe by training and paying them well, running a modern fleet of vehicles, observing good maintenance practices and building a safety culture.

ALDI run a fleet of 269 vehicles with an average age across the fleet of four years. This measures well against the average age of the Australian fleet at 14.8 years.² To keep our vehicles in safe condition ALDI has an onsite mechanic at all eight distribution centres, who completes routine maintenance tasks and asset inspections.

¹ In 2018, ALDI was named Retail Employer of the Year at the Australian Retailers Association Australian Retail Awards and most recently we were recognised as an Employer of Choice at the 2019 Australian Business Awards.

² 2017, Modernising the Australian Truck Fleet: Budget Submission 2017/18, Truck Industry Council, Brisbane.

We are diligent about safe driving hours and sound fatigue management practices. Our policies and processes are strictly enforced to ensure driver and public safety. Each of our distribution centres has a qualified driver trainer whose role is to oversee and train all employees, as well as provide ongoing support for drivers. We require all drivers to maintain work diaries on all trips, irrespective of the distance they drive or work hours completed. An audit is run on 100% of these completed work diaries.

Technology plays a role in delivering safe and efficient systems. ALDI has recently confirmed that following a successful trial, we will roll out a new fleet management tool with plans to deploy Electronic Work Diaries (EWD), once approved by the National Heavy Vehicle Regulator (NHVR). This new tool will be deployed across ALDI's entire fleet. The in-vehicle driver information will allow our team to plan their work and rest breaks and act when alerted to imminent working hour limits.

In addition to striving for excellence in our business we undertake a range of initiatives that drive positive change for the community and our customers, these are detailed in this submission.

OUR BUSINESS

In our 18 years in the Australian market, ALDI has grown to be a significant contributor to the economy, a large employer and major purchaser of freight. ALDI contributed \$3.2 billion to Australia's GDP in 2018 and employed more than 13,000 Australians in 540 stores and eight DCs across NSW, VIC, QLD, ACT, WA and SA. Our business also supports in excess of 11,700 jobs among more than 1000 business partners across Australia.³ More than 20% of our employees are based in regional areas and almost 30% of the supplier jobs we support are located regionally.

Since our first store opening in 2001, it is estimated that we have contributed \$23 billion to GDP. We have an Australia first buying policy and these partnerships represent the most significant component of our contribution to the Australian economy.

We have grown our local business partners from 174 suppliers in 2001 to now more than 1000 suppliers across the country. Independent research undertaken into the relationship between ALDI and our suppliers shows our suppliers consistently view their experience with ALDI as more favourable than other retailers because we are straightforward and honest with them, have an efficient payment process and take an industry best practice approach to the way we do things⁴. ALDI pay in 33 days to goods suppliers and 30 days to third and fourth party logistics providers from receipt of invoice. We continue to demonstrate our commitment to our local business partners as members of the Business Council of Australia's Supplier Payment Code.

We are always clear with our suppliers in what we expect from them and this submission goes into further depth on the fair work and safety requirements we ask of our suppliers and how we confirm they adhere to them. To that end, we will continue to administer Heavy Vehicle Goods-In Supplier Audits.

ALDI offers clear price benefits for our customers. Research undertaken for ALDI by PricewaterhouseCoopers indicates that ALDI saves its shoppers \$2.2 billion per year compared to shopping at national competitors. Further, the research showed that in 2018 we saved non-ALDI customers \$450 million on products they would buy anyway (contributing \$180 million to GDP). Our exclusive products have also forced our competitors to copy our success by increasing the attractiveness of their own private label offer, saving their customers \$3.48 billion in 2018.⁵

³ 2018, "Making a good difference – How ALDI contributes to the Australian economy", Price Waterhouse Coopers.

⁴ Advantage Research, 2018

⁵ 2019, "Making a good difference – How ALDI contributes to the Australian economy", Price Waterhouse Coopers.

SAFETY: OUR NUMBER ONE PRIORITY

The measures ALDI take across our vehicle fleet and in our supplier network to ensure road safety best practice, include:

- The enforcement of a Safety and Corporate Responsibility Charter.
- A Road Safety and Fair Work Checklist completed by all our third and fourth party logistics providers requiring proven compliance during tender for selection as an approved supplier.
- Participation in the National Heavy Vehicle Accreditation Scheme (NHVAS), and the undertaking of an annual audit under the NHVAS to ensure we are complying with requirements.
- Going the extra mile on driver training and building a safety culture in the ALDI fleet.
- Ensuring our fleet is equipped with new and safe vehicles.
- Comprehensive fatigue management practices
- Using technology to improve our safety performance.

Heavy Vehicle Transport Services Safety and Corporate Responsibility Charter

ALDI works to ensure that our heavy vehicle transport services adhere to industry best practice. We enforce a Charter that applies to all ALDI employees, suppliers and contractors providing transport services to us, and details our commitment and expectations to ensure driver and public safety. The Charter:

- Ensures that suppliers comply with ALDI's Corporate Responsibility policy that requires compliance with minimum wage standards and payment timeframe standards.
- Recognises the potential impact that ALDI's actions, expectations and demands can have on independent contractors and commits to Chain of Responsibility compliance in all activities.
- Bears consequences for operators and suppliers who breach it, including removal from the ALDI supply chain.

Tender Audit Checklist

ALDI understands that economic pressures can lead to unsafe practices, therefore we have developed mechanisms to ensure that cost efficiencies are never prioritised over safe driving practices. ALDI has developed a Tender Audit Checklist to ensure that any companies tendering for our business comply with their requirements for pay and conditions under the law.

This checklist is either certified by the tenderer's in-house legal department or by an independent, suitably qualified legal, audit, or compliance professional with expertise in Australian workplace relations and laws.

Areas of compliance covered by this extensive checklist include:

- Compliance with the Fair Work Act 2009, Fair Work Regulations 2009 and related workplace laws for the tenderer and each sub-contractor and other contractors in the tenderers service network.
- Compliance with all applicable workplace laws, applicable modern award and enterprise agreements, and work health and safety laws.
- Having appropriate contracts in place with the sub-contractors and sub-contractors having appropriate contracts in place with their service network.
- Requiring sub-contractors to explain the use of independent contractors instead of full-time employees.
- Ensuring there are no sham contracting arrangements in the tenderer's service network.
- Ensuring the tenderer provides their employees with all their entitlements under their award or agreement (e.g. base pay rate, casual loading, penalties, overtime, allowances, leave, meal and rest breaks). This requirement is tested against employee pay records and other records.

- Ensuring tenderers have a policy and controls to ensure that all workers, employers and sponsors in its service network meet all conditions and restrictions imposed by applicable migration law and policy. Including that they have a right to work in Australia and will not be breaching any visa requirements or immigration laws or regulations.

The above enables ALDI to determine if a company tendering for work is pricing their work based on compliance with the law rather than undercutting their competition through failure to comply with it.

Training our Staff in their Responsibilities Under the Law

ALDI has held Heavy Vehicle National Law (HVNL) training sessions in person or by video conference with the following employees:

- Managing Directors
- Logistics Directors
- Buying Directors
- Purchasing Directors
- Logistics Managers (including Corporate)
- Purchasing Managers
- Section Leaders (Logistics)
- Purchasing Assistants and
- Corporate Safety.

Additionally, online training has been developed and deployed to all Logistics and Corporate Logistics employees, with annual compliance due by 31 December 2019.

Training has focused on the objectives of the law and the responsibility of each party to comply with the law, as well as the safety systems ALDI has in place to ensure safe transport activities.

Building a Safety Culture

ALDI want our staff to be engaged with road safety, which is why we have put the 'Drive Safe, Be Safe' initiative into place. This initiative sees our transport operators around the country taking up the opportunity to complete industry recognised advanced heavy vehicle driving courses to extend their skills and qualifications. Transport Operators have pledged their support to show their personal commitment to 'Drive Safe, Be Safe' as their number one priority.

This message is also being proudly displayed on trucks, promoting a website for the public to share feedback about our driving and professionalism. The 'Drive Safe and Be Safe' initiative adds to the extensive safety policies, procedures and training we have in place.

The initiative is designed to:

- Provide transport operators with an externally recognised defensive driving qualification.
- Issue trailer graphics advertising "My #1 Priority - Drive Safe - Be Safe" that will be displayed as the campaign is launched.
- Upskill driver trainers who hold the TAE40110 by assisting them complete the TAE40111 and TAE40112 course.
- Issue drivers operating at night with a person down pendant

A High Quality Fleet

ALDI run a fleet of 269 modern and safe vehicles with an average age across the fleet of four years. This measures well against the average age of the Australian fleet at 14.8 years.⁶ We don't spare cost when

⁶ 2017, Modernising the Australian Truck Fleet Budget Submission 2017/18, Truck Industry Council, Brisbane.

it comes to vehicles equipped with safety features and low particulate emission technology. Of our fleet:

- Over 75% of our vehicles are from European manufacturers and are equipped with standard European safety features including ABS, lane departure warning and adaptive cruise control.
- All new orders are compliant to the latest European emission standards which are greater than Australian requirements (Euro 6).

ALDI's Maintenance Management System includes periodic maintenance schedules in accordance with manufacturer's recommendations. Maintenance Schedules include:

- A Service Check List used for vehicle servicing and kept on the vehicle's file.
- Service Schedules which are kept as an on-going record of regular maintenance to all vehicles.
- Section Leaders/Assistant Section Leaders ensure that vehicles are made available to routine servicing according to prescribed intervals.
- The approved maintenance provider is required to enter all details of faults/ repairs conducted into the vehicle fault report book.
- All operators utilise the Easy Logic Fault Report Book for any identified vehicle issues, these are triaged by the on-site mechanic.

Additionally, ALDI has an onsite mechanic that completes routine maintenance tasks and asset inspections to ensure vehicles are safe. Transport Operators also complete vehicle inspections at the commencement of every shift before vehicles are driven.

Fatigue Management

Our rostering arrangements support safe driving hours and fatigue management practices, and our policies and processes are strictly enforced to ensure driver and public safety. In addition to supervision for every shift by Section Leaders, each of our distribution centres has a driver trainer whose role is to oversee and train all staff, as well as provide ongoing support for drivers. Our drivers conduct supervised exercises before commencing their shifts, and rest breaks for shifts over 10 hours are continuously monitored via software which helps ALDI ensure compliance with fatigue regulations under the HVNL.

We work alongside our drivers to develop safe and efficient route plans that help to reduce their total kilometers and drive times. We have implemented streamlined booking and delivery arrangements at each of our distribution centres, which ensures delivering vehicles are attended to within the nominated delivery window they selected, thereby removing wait times. The booking system allows our suppliers and their drivers to develop safe and efficient route plans based on their safe driving requirements, the booking windows also remains flexible to cater for unforeseen circumstances.

We require all ALDI drivers to maintain work diaries and run audits on 100% of work diaries. Schedulers are attuned to managing run allocations to give drivers an average shift that is well below the upper limit of hours under Basic Fatigue Management.

Technology to Improve our Performance

Technology plays a role in delivering safe and efficient systems. ALDI has recently announced that following a successful trial, we will expand our use of telematics by rolling out a new fleet management tool with plans to deploy Electronic Work Diaries (EWD), once approved by the National Heavy Vehicle Regulator (NHVR). The new tool will be deployed across ALDI's entire fleet. The in-vehicle driver information will allow our team to plan their work and rest and act when alerted to an imminent or actual breach. The system will also help manage driver performance and allow us to proactively address any poor performance or safety risks behind the wheel.

We have also standardised incident reporting via an online portal called, Safety Online. This platform allows operators to immediately report issues and hazards such as broken lights or obstructions to store dock access. Once filed, these reports are immediately issued to responsible parties to be addressed.

OUR PEOPLE

ALDI has been acknowledged for our effective employee recruitment, engagement and retention practices. We support our employees, providing them with comprehensive training to have an impactful and successful career at ALDI.

In 2018, ALDI was named Retail Employer of the Year at the Australian Retailers Association Australian Retail Awards and most recently we were recognised as an Employer of Choice at the 2019 Australian Business Awards.

Our drivers are employed under Enterprise Agreements approved by the Fair Work Commission. The rates of pay set out for our transport operators compare favourably to the award, on average our operators earn more than 30% above the Road Transport and Distribution Award of 2010.

Under our Enterprise Agreements we provide for up to 50 ordinary hours per week which enables superannuation and leave to be accrued over these hours rather than a standard 38 hour week. Our transport operators receive five weeks of paid annual leave a year irrespective of work performed as shift work. We do not employ a casual workforce. Unless our Transport Operators elect to have part time arrangements we provide guaranteed 40 or 45 hour work weeks and labour hire recruits are converted to permanent employees on average three months after their engagement.

In addition to fair pay and conditions ALDI actively promotes a whistle-blower policy to allow drivers to comfortably voice issues. The ALDI Alertline, which has been in operation since 2013, provides a platform for employees and external parties (contractors, suppliers and other stakeholders) to raise concerns confidentially, if they do not feel comfortable raising their concerns directly with ALDI. The Alertline details are clearly on display for our employees and supplier drivers at all distribution centres.

In 2018, ALDI Australia took the opportunity to review our leave policies and introduce a new Family and Domestic Violence Policy for our employees that goes beyond the Fair Work Commission's provisions.

The ALDI policy includes:

- Ten days of paid Family and Domestic Violence Leave annually for full-time and part-time employees.
- Casual employees may take 10 days of unpaid leave.
- A one-off payment of \$250 for incidental expenses associated with Family and Domestic Violence.
- Assistance in accessing various support services, including access to our specially trained Family and Domestic Violence Supporters and Employee Assistance Program.
- Assistance in changing work location if requested and where possible.
- Access to other leave entitlements such as annual leave, personal/carers' leave, long service leave, other accrued time or leave without pay in accordance with policies relating to these types of leave to attend to matters arising from family and domestic violence.

OUR COMMUNITY

At ALDI we believe we have a responsibility to contribute to positive change in our community as well as driving positive change in retail practices. ALDI undertakes a range of initiatives that have environmental, social and ethical goals.

An example of this work is our participation in the Stronger Together initiative. Stronger Together is a not-for-profit organisation that supports businesses of all sizes to tackle modern slavery in their operations and supply chains. This helps employers and labour providers in at-risk sectors to deter,

detect and deal appropriately with cases of forced labour, labour trafficking and other labour exploitation.

ALDI's *Social Standards in Production* define our commitment to human rights and establish minimum standards that must be met by our suppliers. These are based on the provisions of United Nations conventions, including The UN Convention on the Rights of the Child and The International Labour Conventions, our standards mandate:

- No use of forced or bonded labour.
- No use of child labour.
- Payment of legal minimum wages.
- Freedom from discrimination in the workplace.
- The right to freely join associations, including workplace unions

These standards are binding for all ALDI suppliers and we expect them to communicate these to all levels of the supply chain.

We are committed to working in true partnership with all stakeholders to ensure the necessary changes are made that lead our business into a more sustainable future. As a major Australian retailer, we have a far-reaching influence and can positively affect the wider community through our actions. ALDI has never offered single use carrier bags and the impact of this decision is an estimated avoidance of 40,000 tonnes of plastic, from entering the environment.

ALDI is committed to continue working with its business partners to reduce plastic packaging by 25% by the end of 2025 (2019 baseline). We will also phase out problematic and unnecessary single-use plastics by the end of 2020. These include plastic straws, plastic disposable tableware and plastic stemmed cotton buds. As an active member of the Australian Packaging Covenant Organisation, we have been working within our business and together with our business partners to identify the best ways to reduce our reliance on plastics. This includes actively exploring and encouraging innovation in new packaging solutions and fostering the development of a circular plastics economy in Australia.

We believe reducing our consumption and emissions is not only the environmentally responsible thing to do, it makes good business sense from cost savings point of view. In 2018, we reduced our Greenhouse Gas Emissions per square metre of sales area by more than 30%, two years ahead of our 2020 target. Our new store layouts feature low impact refrigerants and LED lighting and we plan to continue to rollout solar panels to our stores and distribution centres. In addition all new purchases of prime movers have been to the latest European standards which exceed Australian mandated requirements.

As a significant player in the food supply chain animal welfare is a key focus for our business. We work with our suppliers to improve housing conditions for animals, prohibit animal testing on ALDI products, and adhere to the globally recognised 'Five Freedoms' for farm animals. We also offer our customers a range of organic and free-range options.

As part of ALDI's commitment to animal welfare we only work with fresh meat suppliers that engage superior animal welfare practices. All ALDI branded fresh meat suppliers (beef, lamb, pork and poultry) are subject to independent audits to ensure they adhere to best-practice animal welfare standards. These standards are developed and reviewed by a committee that includes industry experts, government representatives, animal behavioural and veterinary scientists and animal welfare organisations. This ensures we are continuously improving and evolving our animal welfare standards.

RESPONSE TO TERMS OF REFERENCE

- a. the importance of an enforceable minimum award rate and sustainable standards and conditions for all stakeholders in the road transport industry;

ALDI understands that economic pressures can lead to unsafe practices. We have developed mechanisms to ensure that cost efficiencies are never prioritised over safe driving practices. These are presented in detail in the *Safety: Our Number One Priority* section of this submission.

- b. the development and maintenance of road transport infrastructure to ensure a safe and efficient road transport industry;

ALDI as a user of road transport infrastructure acknowledges the importance of investment by all levels of government in infrastructure that drives better safety outcomes. In this submission we recommend greater investment in designated heavy vehicle rest stops required to support and enable driver breaks to promote safety and compliance with fatigue management requirements.

- c. the regulatory impact, including the appropriateness, relevance and adequacy of the legislative framework, on all stakeholders in the road transport industry;

ALDI holds HVNL training sessions for staff and ensures all our suppliers understand their obligations under the law. While the HVNL is delivering benefits across the supply chain we believe more can be done to strengthen it. We recommend the NHVR should be allowed to carry out its harmonisation agenda properly and deliver the productivity and safety benefits to the industry that it was set up to deliver.

- d. the training and career pathways to support, develop and sustain the road transport industry;

ALDI is an employer of choice and in 2018, ALDI was named Retail Employer of the Year at the Australian Retailers Association Australian Retail Awards. Most recently we were recognised as an Employer of Choice at the 2019 Australian Business Awards.

There is a critical skills shortage in the road transport industry and we are supportive of any measures to attract and skill workers for Australia's future freight task. We are keen to work with government on initiatives that deliver a skilled road transport workforce.

- e. the social and economic impact of road-related injury, trauma and death;

ALDI take a safety-first approach across the freight to plate supply at ALDI and we see any road incident as one incident too many and support the work of industry and governments in working towards zero incidents. We understand there is no silver bullet approach to road safety, but we hope by highlighting some of the best practice measures we undertake in our business we can help inform the final report of the inquiry on future directions for industry and government.

- f. efficient cost-recovery measures for industry stakeholders, including subcontractors;

ALDI are supportive of enforceable payment timeframes for all players in the road transport industry. We recognise that payment timeframes are a key area of distress and undue economic pressure for stakeholders in the supply chain and contractors.

ALDI pay in 33 days to goods suppliers and 30 days to third and fourth party logistics providers from receipt of invoice. We continue to demonstrate our commitment to our local business partners as members of the Business Council of Australia's Supplier Payment Code.

We are always clear with our suppliers in what we expect from them and this submission goes into further depth on the fair work and safety requirements we ask of our suppliers and how we confirm they adhere to them.

ALDI works to ensure that our heavy vehicle transport services adhere to industry best practice. We enforce a Heavy Vehicle Transport Services Safety and Corporate Responsibility Charter that applies to all ALDI employees, suppliers and contractors providing transport services to us, and details our commitment and expectations to ensure driver and public safety.

We undertake Heavy Vehicle Goods-In Supplier Audits to ensure compliance with HVNL at the dock face.

- g. the impact of new technologies and advancements in freight distribution, vehicle design, road safety and alternative fuels;

ALDI recommends the mandatory adoption of EWDs. ALDI has recently announced that following a successful trial, we will expand our use of telematics by rolling out a new fleet management tool with plans to deploy EWDs across ALDI's entire fleet.

We have also standardised incident reporting via an online portal called, Safety Online. This platform allows operators to immediately report issues and hazards such as broken lights or obstructions to store dock access. Once filed, these reports are immediately issued to responsible parties to be addressed.

ALDI run a fleet of modern vehicles with an average age of four years. We believe incentives could be provided to operators for the uptake of newer, safer and more environmentally friendly vehicles.

- h. the importance of establishing a formal consultative relationship between the road transport industry and all levels of government in Australia; and

ALDI is open to engaging in constructive dialogue that leads to better safety outcomes. We welcome this Inquiry and the work of the Committee as an important pathway to direct conversations between road transport operators, the government and other stakeholders.

- i. other related matters.

While this Inquiry doesn't refer explicitly to accreditation schemes, we recommend the establishment of a resource, or an addition to existing NHVR portals listing the accreditation scheme that transport companies operate under. This would deliver improved safety outcomes by allowing companies procuring road freight services to have greater visibility of whether bidders are properly accredited, and reduce administrative effort for those road transport companies.

RECOMMENDATIONS

Based on our knowledge of operating an extensive transport network and supply chain throughout Australia we offer the following recommendations for consideration by the Committee:

- 1) A lack of harmonisation in heavy vehicle law continues to be a challenge and drain on efficiency despite the establishment of the National Heavy Vehicle Regulator (NHVR). The NHVR should be allowed to carry out its harmonisation agenda properly and deliver the productivity and safety benefits to the industry that it was set up to deliver.
- 2) Support mandatory adoption of EWDs for all hours of work.
- 3) There is no visibility or transparency about which accreditation scheme various carriers operate under. The establishment of a resource, or an addition to existing NHVR portals listing the accreditation scheme that transport companies operate under would deliver improved safety outcomes.
- 4) Greater investment in designated heavy vehicle rest stops required to support and enable driver breaks to promote safety and compliance with fatigue management requirements.

CONCLUSION

At ALDI, we see ourselves as a major contributor to the Australian economy and Australian society through our commitment to local jobs, our focus on good safety and employment practices and our work to enhance community well-being.

As a quiet achiever, ALDI does not seek reward or publicity for stretching ourselves and aspiring to deliver our products to customers with high standards of integrity and ethics. In the area of transport, we do the right thing not because of pressure from outside parties or to meet regulatory requirements, we focus on the highest safety standards because one fatality on our roads is one too many.

We thank the Committee for the opportunity to lodge this submission and hope it can contribute positively to the final report from this Inquiry.