



18 September 2026

Safeguard Mechanism Taskforce
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

Via: safeguard.mechanism@dcceew.gov.au

RE: Submission to the 2026–27 Review of the Safeguard Mechanism

The Livestock, Bulk and Rural Carriers Association (LBRCA) represents road transport operators performing some of Australia's most essential and challenging freight tasks, including the movement of livestock, grain, agricultural inputs, bulk commodities and other freight throughout remote, rural and regional Australia.

Our members operate at the first and last mile of agricultural supply chains and, in many cases, across the entire freight journey. They depend on safe, reliable and productive road networks and interact extensively with railheads, ports, saleyards, processors, farms, feedlots, grain facilities and intermodal terminals.

For much of the freight task undertaken by LBRCA members, road and rail are not substitutable modes. Livestock must be collected from farms, grain must reach receival sites, agricultural inputs must reach producers, and regional communities and businesses must be supplied by road. In many cases, there is no practical rail alternative.

This submission therefore focuses on whether the amendments, as proposed to the Safeguard Mechanism, adversely impact rural freight and whether there is any tangible benefit to emissions. Our position is that the approach as suggested in the consultation will extend compliance costs to freight tasks with no realistic modal or technological substitute. LBRCA supports practical, evidence-based, and commercially achievable outcomes related to decarbonisation, but rural operating realities must be recognised in any policy change.

Yours sincerely,

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18 September 2026

Prepared for the Department of Climate Change, Energy, the Environment and Water by the LBRCA.



Executive summary

The Livestock, Bulk and Rural Carriers Association (LBRCA) urges reviewers to consider the practical and commercial impacts of the proposals outlined in the consultation paper. There are adverse implications for Australia's heavy vehicle sector and more acutely for the rural freight sector.

LBRCA does not support extending the Safeguard Mechanism's effective reach to road freight through mandatory national aggregation of transport facilities or a lower coverage threshold. The Government should retain existing reporting optionality and the 100,000 tonnes CO₂e threshold. There is no clear material additional abatement that exceeds the economic, regulatory and regional supply chain costs of change.

This position is consistent with the government's own framework for the review. The Department of Climate Change, Energy, the Environment and Water (DCCEEW) states that scheme coverage should take account of competitive neutrality and that any extension should occur only where a "material benefit can be demonstrated" (DCCEEW 2026a, p. 3). The review also states that it is not intended to make fundamental reforms to the Safeguard Mechanism's design (DCCEEW 2026a, p. 2).

The proposed change to transport facility reporting is material and DCCEEW estimates that mandatory national facility reporting would increase the share of NGER reported road freight emissions covered by the Safeguard Mechanism from 10 per cent to 51 per cent, increasing covered road freight emissions from approximately 0.4 Mt CO₂-e to 1.7 Mt CO₂-e (DCCEEW 2026a, p. 34).¹

For livestock, agricultural bulk and rural freight, the central policy issue is contestability. Road and rail cannot be assumed to be substitutes merely because both move freight. DCCEEW itself states that road performs bulk freight tasks where rail is unavailable or financially unviable, that road and rail may be complementary rather than competing services, and that grain overlap is periodic with little to no road/rail overlap from farm to receival site (DCCEEW 2026a, pp. 33-34).

Australian Government agricultural supply chain research likewise identifies road as the primary mode for Australian livestock because dispersed farm origins, direct routing and flexibility constrain practical rail substitution (PwC & Ranbury 2017, pp. 30, 32-33).²

Road freight is an economically essential enabling industry that is embedded across the national economy. Disruption in the sector spreads quickly across agriculture, construction, mining, manufacturing, and retail, exposing every industry's supply chain. The Australian road freight industry is highly fragmented and overwhelmingly made up of small operators. It has been suggested that operators earn one to three cents of profit per dollar of revenue and generate returns by using their assets intensively rather than through pricing, because of intense competition, which anchors freight rates to cost, harming viability. This also means the sector is highly sensitive to shocks and regulatory changes.

¹ Department of Climate Change, Energy, the Environment and Water (DCCEEW), Safeguard Mechanism Review: Consultation Paper, August 2026, pp. 33–35, especially Table 3.2 (p. 34), https://storage.googleapis.com/files-au-climate/climate-au/p/prj3e1e2fec133c66d211d71/page/Safeguard_Mechanism_Review_consultation_paper_August_2026.pdf.

² DCCEEW 2026, Safeguard Mechanism Review: Consultation Paper, pp. 33–34; PricewaterhouseCoopers Consulting (Australia) & Ranbury Pty Ltd 2017, Technology and Supply Chains for Critical Industries: Agriculture Sector, pp. 30, 32–33, https://www.infrastructure.gov.au/sites/default/files/migrated/transport/freight/freight-supply-chain-priorities/research-papers/files/Working_Paper_Agriculture.pdf.



LBRCA's recommendations

- 1 Retain the existing ability to define transport facilities on a state/territory or national basis. Do not mandate national aggregation. If this lever remains under consideration, defer any decision until Transport Resilience and Capacity Kickstart (TRACK) evidence is released and rural and agricultural freight is separately assessed.
- 2 Retain the existing 100,000 tonnes CO₂e Safeguard threshold for road freight. A lower threshold should not be met without clear evidence of material additional direct abatement and a net public benefit, or a cost implication for road transport.
- 3 Reject reliance on a generic road/rail competitive neutrality argument to justify new road-freight obligations. Require evidence of genuine modal contestability at the relevant freight market, commodity or corridor level.
- 4 Explicitly recognise livestock, agricultural bulk, first/last-mile and other non-contestable rural freight in future Safeguard settings, and review whether existing road freight production variables adequately reflect those operations before extending coverage.
- 5 Ensure Safeguard obligations reflect the actual availability and commercial readiness of emissions reduction technologies for heavy, long-distance and rural freight. Noting that such technologies suitable for the freight task (right mode, right load) are not widely available, including enabling infrastructure.
- 6 Prevent overlapping or duplicative obligations between the Safeguard Mechanism and emerging low-carbon liquid fuel or other fuel policy measures.
- 7 Prioritise productivity and pragmatic emissions reduction approaches, including but not limited to better heavy vehicle access, higher productivity combinations, support for fleet renewal and commercially viable lower emissions fuels and technologies.
- 8 Identify and support SME rural freight transition pathways with accessible fleet-renewal assistance and regional charging/refuelling support, without using hard mandates or technology bans, with consideration of market structure, design and capital limitations. Grants designed for large fleets should not be accepted as the only practical route to decarbonisation; there needs to be more support for small/medium and rural carriers.



1. Policy context

The Safeguard Mechanism applies declining emissions baselines to Australia's largest emitting facilities. The National Greenhouse and Energy Reporting Act 2007 identifies relevant Safeguard outcomes, including declining net emissions, a material incentive for onsite abatement and appropriate support for industry competitiveness (Commonwealth of Australia 2007, s. 3(2); DCCEEW 2026a, pp. 3–4).

The current facility threshold is 100,000 tonnes CO₂e of covered emissions per year. DCCEEW is considering whether a lower threshold should apply after 2030. The department acknowledges that newly covered facilities would face additional regulatory and compliance costs, that smaller facilities may have less capacity to absorb those costs, and that a threshold can itself create competitive distortions (DCCEEW 2026a, pp. 35–38).

This will materially impact regional and rural freight operators and businesses generally. The nature of the rural economy places an increased burden on businesses operating in these environments, for example, longer travel distances, less enabling infrastructure for decarbonised technologies, and emissions intensive industries.

The government should demonstrate that the reform will produce additional, cost-effective real-world abatement, rather than creating additional compliance obligations and cost burdens. It is unclear what the benefits are, and there is no evidence to suggest they will outweigh impacts on freight productivity, regional supply chains, business viability and competition.

2. Mandatory national aggregation is lazy design

Under the National Greenhouse and Energy Reporting Regulations, transport activities may be attributed to individual states or territories, and eligible transport activities may be nominated for national reporting. Road freight transport is expressly within those arrangements. DCCEEW is considering removing that optionality and requiring a national definition of a transport facility.³

The policy rationale advanced in the consultation paper is that state-based reporting can produce different Safeguard outcomes between otherwise comparable transport businesses and may contribute to differences in coverage between road and rail (DCCEEW 2026a, pp. 32–34). However, the proposed effect is substantial and misunderstands or misinterprets how freight businesses operate.

A change that would increase covered road freight emissions more than fourfold should not be understated; it is not an administrative adjustment to measurements. It is a material expansion of the mechanism's practical reach into trucking, road freight operations, and a firm's operating models across borders.

We do not accept the imposition of a national facility definition and remain concerned about the significant impacts it will have on road transport and rural economies. The government has not

³ National Greenhouse and Energy Reporting Regulations 2008 (Cth), regs 2.19–2.19A



articulated the additional gross emissions reductions expected, the proportion of newly covered freight with a realistic technological or modal abatement option, compliance costs and likely effects on freight markets or freight rates, impacts on regional and agricultural supply chains, effects on subcontracting and market structure and

whether equivalent reductions could be achieved more efficiently through productivity, access, fuel or technology reforms.

This is particularly important because DCCEEW has expressly stated that scheme coverage should take competitive neutrality into account and that extensions should occur only where a material benefit can be demonstrated.

We extend our support to other industry associations, with a core position on maintaining state level facilities. If mandatory national aggregation continues to be pursued, it should at a minimum be considered against the evidence from the TRACK pilot about road/rail cross elasticity, before progressing to development and implementation. LBRCA maintains that transport facility definitions must separately identify livestock, farm collection, farm-to-receival and other rural freight for which rail is not a practical substitute and cannot be deployed as such.

3. Competitive neutrality

The proposition that different Safeguard coverage between road and rail necessarily creates a competitive distortion is too broad. Competition depends on whether the modes are sufficiently substitutable for the freight task.

DCCEEW recognises that freight choices depend on cost, speed, service frequency, reliability, availability, flexibility, freight mass and handling requirements. It also states that road performs bulk freight tasks where rail infrastructure is unavailable or financially unviable, and that road and rail may be complementary rather than competing services (DCCEEW 2026a, pp. 33-34).⁴

For much of the freight task undertaken by LBRCA members and rural carriers, those distinctions are decisive. Livestock must be collected from farms, grain needs to transit from farms to receival sites, fertiliser, feed, seed and other agricultural inputs must reach producers and regional communities, and businesses must be supplied by road. No other mode of land transport can replicate the role of road transport in the freight system. The existence of rail somewhere in the broader supply chain does not, by default, make all road legs contestable.

This is consistent with research in transport economics. Australian freight mode choice decisions are multi-dimensional; customers respond to service attributes such as price, transit time, frequency and reliability. Interventions that make carbon intensive heavy transport more expensive does not guarantee people or businesses will automatically switch to greener alternatives.

DCCEEW's own analysis finds little to no road/rail overlap for grain movements, for example, from farm to receival site (DCCEEW 2026a, p. 34). Agricultural supply chains are characterised by the distributed nature of farms, which creates heavy reliance on roads, and by fragmented production, which constrains rail use.

For livestock specifically, it is typically collected from farms and transported by road to processing plants, feedlots, abattoirs or other end users, often over long distances. Road transport is the

⁴ DCCEEW 2026, Safeguard Mechanism Review: Consultation Paper, pp. 33–34. The paper states that road performs bulk freight where rail is unavailable or financially unviable and that road and rail may be complementary or competing depending on the market.



primary mode for Australian livestock because it can move truckloads from points of origin directly to nominated abattoirs, with immediate departure upon loading. Constrained rail access (i.e. inaccessible to the farm gate or other end point) and dispersed farm locations further reinforce road dependence.

Where an alternative mode does not provide a commercially and operationally equivalent service, increasing the carbon cost of road freight cannot reasonably be assumed to generate meaningful modal shift. It will have consequences for the sustainability of otherwise viable road transport businesses. This cost is more likely to remain within the road freight and agricultural supply chain.

Accordingly, an apparent difference in Safeguard coverage between road and rail is not, by itself, evidence of a competitive distortion. Even if the government considers additional Safeguard coverage justified for genuinely contestable freight, it cannot assume that the same arguments apply to livestock, agricultural bulk, farm-to-receival, first/last-mile and other rural freight. In many of these markets, or for specific rural commodities, there is no rail substitute, no currently viable zero-emission substitute, and limited ability to alter the operating characteristics that drive emissions.

Before any Safeguard reform is justified on road/rail competitive neutrality grounds, the government should establish genuine contestability that is not reliant solely on the suggestion of proponents of rail or decarbonisation. Considerations could include origin and destination, including first and last mile requirements, whether the road leg is unavoidable because rail cannot serve the receival/delivery point, availability and capacity of road and rail infrastructure, door-to-door transit time, service frequency and reliability, handling and storage requirements, commodity characteristics, including livestock welfare and perishability, seasonality and variability in freight volumes and availability of comparable services at the required time.

4. Retain the existing threshold for road freight

DCCEEW is considering whether the existing 100,000 tonne threshold should be lowered after 2030. Modelling shows that lower thresholds would materially increase the number of covered facilities, while the department acknowledges that smaller facilities may have less capacity to absorb compliance costs and that any threshold can create new competitive distortions (DCCEEW 2026a, pp. 35-38).⁵

A carrier approaching the threshold may have an incentive to take future Safeguard liability into account when considering expansion, acquisition or consolidation. This is especially true for SMEs, and there is strong potential for lower thresholds to distort acquisition and expansion decisions. In determining policy, the government should be acutely aware of the increasing regulatory and compliance costs on road freight businesses and of the impacts already being experienced across the road freight sector in Australia. LBRCA refers to the Australian Institute of Credit Management report⁶, notably:

- ASIC data shows insolvency in the Transport, Postal and Warehousing sector increased from 196 in FY2021-22 to 495 in FY2023-24
- Closure data suggests pressure remains elevated entering FY2026
- CreditorWatch reports that 8.46 per cent of road transport businesses exited in the 12 months to November 2025, 40 per cent higher than the year before

⁵ DCCEEW 2026, Safeguard Mechanism Review: Consultation Paper, pp. 35–38.

⁶AICM, [Risks mounting in Australia's road transport sector: One in 12 operators close in past 12 months](#)



- This is despite freight volumes remain supported by population growth, infrastructure investment and domestic consumption
- Operating costs have reset higher while freight rates have struggled to keep pace, resulting in sustained margin compression that has eroded cash flow across the sector.

Capturing more road freight businesses in the Safeguard Mechanism does not create the vehicles, fuel infrastructure or commercially viable technology needed to reduce emissions across the freight task. Where direct abatement options remain constrained, a lower threshold may principally increase demand for ACCUs or other compliance units rather than reduce diesel use.

Additional coverage should be supported by evidence that newly covered operations have realistic means to reduce underlying emissions.

5. Rural freight production variables

The Safeguard Mechanism uses production variables to establish emissions intensity baselines. The National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015 provides separate road-freight production variables for non-bulk freight, temperature-controlled non-bulk freight, specialised and heavy haulage, and bulk freight (Commonwealth of Australia 2015, sch. 1 pt 23).⁷

These definitions do not expressly identify livestock freight as a distinct production variable. That is significant because livestock and other rural freight tasks can have operating characteristics that materially affect emissions intensity without representing operational inefficiency. As do other rural and agricultural freight movements, including but not limited to:

- empty return and limited backloading opportunities
- dispersed origins and destinations and long distances
- seasonal and harvest-related demand peaks
- livestock welfare and time constraints
- biosecurity and washdown requirements
- network access restrictions and consequential detours
- specialised vehicle configurations and high productivity combinations.

An output based regulatory framework should not inadvertently treat the geography or inherent characteristics of the freight task as emissions inefficiency. Before extending road freight coverage, the government should test whether those variables and their emission intensity values adequately capture the operating realities of rural freight. A category that is technically broad enough to include a rural task may still fail to recognise the unavoidable characteristics of empty running, seasonality, welfare, washdown, access, and distance that determine its emissions intensity.

6. Abatement obligations must reflect technology readiness

LBRCA broadly takes a technology agnostic approach to fuels, vehicle types and related operating systems where they are legal, safe, support operators and do not pose any inherent risk to the freight system. Our priority remains ensuring new or emerging technologies are safely, commercially and

⁷ National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015 (Cth), Schedule 1, Part 23, Divisions 2–5.



operationally able to perform the relevant freight task and that regulators do not mandate the end of existing technologies. There remain, however, limited viable technological options for many rural operators, particularly for heavier combinations, long distances and routes or the required enabling infrastructure.

AECOM's road-freight electrification work for the Australian Renewable Energy Agency identifies urban freight as the most immediately feasible use case for electrification because suitable vehicles already exist, and routes are shorter and more predictable. Intrastate and interstate freight are identified as long-term opportunities, requiring further route assessment, charging infrastructure, market development, and coordinated policy action. The report also identifies upfront vehicle cost, limited model availability and operating conditions created by policy and regulatory regimes as barriers to uptake (AECOM 2025, pp. 2-4).⁸

Those constraints are particularly relevant to livestock, bulk and rural operations, which commonly involve heavier combinations, long distances, variable routes and lower-density charging or alternative fuel infrastructure. These issues need to be tested in a regulatory sandbox to establish proof of concept, to inform future government policy, and particularly any regulatory or mandate action. Policy should therefore be calibrated against demonstrated technological availability for the relevant freight task, not an assumed economy wide technology pathway. Where a zero-emission substitute is not yet commercially viable, policy should recognise pragmatic near-term pathways including productivity gains, fleet renewal and lower-emission fuels.

7. Productivity should be treated as a core decarbonisation measure

Heavy vehicle productivity provides a direct pathway to lower fuel use and emissions intensity. The NHVR's 2024-25 Annual Report estimates that, compared with conventional equivalent vehicles undertaking the same freight task, Performance Based Standards (PBS) vehicles reduced fuel use by approximately 306.5 million litres and CO₂ emissions by approximately 818,700 tonnes (NHVR 2025, pp. 25-26).⁹

The NHVR's Heavy Vehicle Productivity Plan 2025–2030 also explicitly links productivity, resilience and sustainability, recognising that increased efficiency can reduce emissions while strengthening the freight system (NHVR 2024, p. 7).

The LBRCA welcomed the Productivity Commission report's findings that the benefits of productivity gains will come from increasing general access, improving proven, safe and high productivity vehicles and reducing road access red tape. To support those findings, the Bureau of Infrastructure and Transport Research Economics (BITRE) modelling suggests that increasing general mass limits could raise road freight productivity 1.0%- 3.2%¹⁰, reducing the number of trips required.

Rural freight can achieve direct emissions reductions through broader access for higher-productivity and higher general mass combinations, reduced detours and indirect routing, consistent cross-border

⁸ AECOM 2025, *Electrifying Road Freight: Pathways to Transition*, prepared for the Australian Renewable Energy Agency, especially the Executive Summary and pp. 2–4; ARENA knowledge bank, <https://arena.gov.au/knowledge-bank/aecom-electrifying-road-freight-report/>.
⁹ National Heavy Vehicle Regulator (NHVR) 2025, *Annual Report 2024–25*, pp. 25–26; NHVR 2024, *Heavy Vehicle Productivity Plan 2025–2030*, p. 7.

¹⁰ Productivity Commission, *Impacts of heavy vehicle reform: study report*, August 2026, pp. 6, 33-34.



access, automated and nationally consistent access decisions, building infrastructure capable of supporting productive combinations, higher payload efficiency and fleet renewal.

8. Avoid duplication in Safeguard and low-carbon fuel obligations

The interaction between the Safeguard Mechanism and the emerging low-carbon liquid fuel (LCLF) policy requires careful design. DCCEEW's consultation paper recognises that policies intended to increase the supply and demand for lower-carbon fuels may overlap with Safeguard obligations (DCCEEW 2026a, p. 34).¹¹

The Australian Government has separately stated that LCLFs will be important for sectors where electrification is difficult, including heavy transport and agriculture, and is consulting on a potential demand mechanism to grow domestic production and uptake.

Freight operators should not bear higher fuel costs attributable to an LCLF obligation while also facing a Safeguard liability that fails to recognise the resulting emissions reduction. Doing so would risk duplicative regulation and weaken the cost-effectiveness of both policies.

9. Evidence should precede further modal intervention

The Government has established the \$52 million Transport Resilience and Capacity Kickstart (TRACK) pilot. Round One provides up to \$26 million in incentive payments to move more freight by rail and subsequent rounds are intended to support rail and maritime freight. The program is expressly aimed at conserving diesel and improving freight resilience (Department of Infrastructure 2026).¹²

TRACK provides an opportunity to test how responsive freight customers are to modal incentives in practice. That evidence should inform, rather than follow, any Safeguard decision justified on road/rail competitive-neutrality grounds. A national or corridor-level response to a rail incentive must not be assumed to apply to livestock, farm collection, farm-to-receival and other rural freight markets where practical cross-elasticity may be very low.

10. Rural SME transition support must match new obligations

TRACK highlights a broader policy-coherence issue for rural road freight. The government is providing direct incentive payments to eligible rail operators to shift freight from road to rail, while many small rural road operators face much more complex pathways to obtain support for emissions reduction. Existing ARENA support for heavy vehicle electrification is valuable, but it is structured as competitive project funding rather than as a simple fleet renewal or per-vehicle rebate. This creates a barrier for SME's to access funding or transitional support.

¹¹ DCCEEW 2026, Safeguard Mechanism Review: Consultation Paper, p. 34; Australian Government 2026, Building Australia's fuel security with strategic fuel reserves and low carbon liquid fuels, joint ministerial media release, 18 August 2026.

¹² Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts 2026, Transport Resilience and Capacity Kickstart (TRACK) pilot program, 11 September 2026. Round One provides up to \$26 million in incentives to move more freight by rail within a \$52 million program.



The Transport and Infrastructure Net Zero Roadmap and Action Plan acknowledges that higher-productivity road freight vehicles will be needed to move more goods more efficiently, thereby lowering emissions. Over 90% of road freight businesses are SMEs or sole traders; they do not have access to subsidies to purchase higher-productivity, lower-emission combinations.

Under ARENA's current Driving the Nation settings, applicants generally seek project grants and are typically expected to provide matching funding. The current truck focus area expects grants of at least \$1 million. The program can support regional routes, shared charging, and capital-light models for smaller fleets, but its scale, co-funding, and project-development requirements are a significant departure from the broadly accessible assistance for individual SME operators (ARENA 2025a, pp. 4-5; ARENA 2025b, pp. 1-3).¹³

If the Government expects more road freight businesses to carry Safeguard obligations, it should also ensure that practical abatement support is accessible to the businesses most affected.

Conclusion

For livestock, agricultural bulk and much rural freight, road transport performs a task that cannot simply be transferred to rail and cannot yet universally be performed by a commercially equivalent zero-emission heavy vehicle. DCCEEW's own analysis recognises that road and rail can be complementary, that bulk freight may move by road where rail is unavailable or financially unviable, and that grain movements from farm to receival site have little to no modal overlap (DCCEEW 2026a, pp. 33-34).

The policy as currently proposed will be measured not by how much additional road freight can be brought within the Safeguard Mechanism, but whether doing so will deliver additional, practical and cost-effective emissions reductions or simply make more businesses unviable. Even if the government considers additional Safeguard coverage justified for genuinely contestable freight, it should not assume those arguments apply to livestock, agricultural bulk, first/last-mile and other rural freight where there is no realistic rail substitute, limited viable zero-emission technology and little ability to eliminate the operating characteristics that drive emissions.

LBRCA therefore recommends that the government retain current transport reporting optionality and the existing threshold, reject generic road/rail competitive neutrality claims where freight is not genuinely contestable, explicitly recognise agricultural and rural freight, review production variables; avoid overlapping carbon and fuel policy costs, place productivity, access and fleet renewal at the centre of road-freight decarbonisation; and provide transition support that is practically accessible to rural SMEs.

¹³ Australian Renewable Energy Agency (ARENA) 2025a, Driving the Nation Program Guidelines, 15 October, pp. 4–5 (minimum grant expected \$500,000 and applicants typically expected to at least match ARENA funding); ARENA 2025b, Driving the Nation Program – Focus Areas: Trucks, Charging, V2G and Innovation, pp. 1–3 (the current truck focus area expects grants of at least \$1 million and includes regional routes and capital-light models for smaller fleets).



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