Introduction

The Australian Logistics Council (ALC) welcomes the opportunity to contribute towards the development of the National Freight Data Hub (The Hub) by the Commonwealth Government.

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

ALC members have been in the forefront of assisting government in the development of projects such as the Transport Satellite Account, the Freight Data Visibility Pilot coordinated by BITRE and the industry-led Location Registry Pilot.

This activity made it clear that technology and data will play an increasingly important role in building national capacity to meet the growing freight task more safely and efficiently. It follows that better collection and access to freight data is a critical action area in the National Action Plan.¹

The creation of a freight hub will give effect to the key industry recommendation contained in the Report of the Inquiry into the National Freight and Supply Chain Priorities, to fund what was called a ‘freight observatory’ to collect, analyse and publish freight performance data for all freight modes and supply chains, so to better inform decision making and investment².

The potential value of sharing data has been a central subject at ALC technology summits since 2018. The outcomes of these summits resulted in a realisation that there needs to be close alignment between government and industry on the ultimate goal of the data hub and the arrangements under which data could be shared.

The National Freight Data Hub: Discussion Paper #1 (the discussion paper) will form the start of this clarification process.

**Priorities**

ALC prioritises the suggested purposes of a freight data hub contained in the discussion paper, in this order:

1 - **Improving Investment Decisions**

A freight data hub should provide the evidence needed for governments at all levels to make smarter and more targeted investments to enhance supply chain efficiency. Access to timely accurate data will enhance the planning and prioritisation of key supply chain infrastructure. This will deliver significant benefits to communities by helping to ensure scarce resources are invested where they are most needed.

Quality data will also enhance operational decisions for industry in terms of mode sharing, fleet and route selection.

The data will also add rigour to policy deliberations ensuring an evidence base informs the formulation, retention or modification of policy at all levels of government.

2 – **Performance Measurement and Benchmarking**

The Inquiry into National Freight and Supply Chain Priorities report identified a number of uses for supply chain data, including through benchmarking of key export supply chain performance against international competitors, and the establishment of a data gathering and performance review mechanism focused on travel times and reliability on key freight routes.

Whilst noting that the Australian Bureau of Statistics’ Transport Satellite Account has similar benefits, the ability to measure freight industry performance and benchmark against international competitors would allow a Freight Data Hub to provide substantial industry benefit.

3 – **Supporting Operational Decisions**

A Freight Data Hub must present clear operational and commercial benefits to operators that choose to allow access to their data.

Whilst operators already collect and store data in enterprise systems, there will be a collective benefit to being able to utilise industry wide data to inform business decisions, provided that the availability of such data does not impede on competition or business operations.

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What Data Should Be Included?

Whilst there are many datasets collected by regulators, governments and industry, ALC strongly believes that in a general sense the inclusion of data in a data hub must be voluntary and must provide real benefit to government and industry without creating commercial disincentives. ALC believes that any data provided to the Commonwealth must be protected by explicit permissions agreed by the operator and the department ahead of provision.

Telematics data, origin destination freight movements and heavy vehicle fleet compositions are datasets currently collected by freight operators, and have the potential to be included in a freight data hub (provided this will not infringe on commercial operations). Real time consignment information and commodity transit times (averaged so it cannot be identified to a specific operator) will also provide benefit if included in a data hub.

Governments also have a role to play in providing datasets to a freight data hub. The Department of Home Affairs collects comprehensive data on exports. The National Heavy Vehicle Regulator (NHVR) collects road access arrangement and vehicle registration/accreditation data, as well as data in relation to compliance. State Governments also collect data about vehicle and road usage, including accident and safety reports. It is crucial that a National Freight Data Hub includes data collected by the Commonwealth and state and territory jurisdictions.

Sharing Data

ALC maintains that the sharing of data between industry and government must remain strictly voluntary.

However, whilst the benefits of a national freight data hub are clear, industry remains hesitant to share data without conditions present that limit the visibility of data from an individual operator to competitors and other government bodies. This hesitation, whilst significant, is not a barrier to the development of a freight hub. To overcome this challenge, firm undertakings between industry and government should include stipulations as to who can view or access individual datasets and at what level.

The identification of the data sets industry is prepared to freely share is a priority for the Freight Hub project during 2020.

The development of a national freight data hub must focus strongly on building trust, relationships and governance models to support data sharing. However, further consultation with industry is needed to determine what data can be shared under certain permissions, and what data cannot be shared under any circumstances.

**Standards**

ALC has consistently called for international alignment of data standards, as this is particularly vital in ensuring accurate use and sharing of data given the international nature of trade.

This was discussed in the 2018 ALC paper *A Common Data Set for Our Supply Chain*. The Paper noted:

> The international nature of the GS1 Global Standards is noted, as is the Telematic Data Dictionary (aligned with ISO 15638) which establishes the Framework for Collaborative Telematics Applications for Regulated Commercial Freight Vehicles (also known as the TARV). ALC believes that although undesirable for governments to own or fund information transfer mechanisms, they can facilitate uptake by shaping consistent regulatory standards.

> Given the global nature of today’s marketplace, a multilateral agreement to determine information standards under a global coordinating body is highly desirable in the longer term.

> Within this context the Commonwealth Government can display international leadership by seeking to develop a common data set at an international level by:

> - The development of a standard via some form of joint technical committee of the ISO and the IEC, a mechanism used to develop, maintain or promote information technology standards; or

> - The further refinement of model laws facilitating the use of electronic communications in international commerce, managed by the United Nations Commission on International Trade Law (UNCITRAL).

> It follows that if this initiative was adopted, individual Australian regulators should not develop their own data sets or data standards for their own statutory purposes.

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5 [www.iso.org/standard/59184.html](http://www.iso.org/standard/59184.html)

6 International Organisation for Standardisation

7 International Electrotechnical Commission

8 [www.iso.org/isoiec-jtc-1.html](http://www.iso.org/isoiec-jtc-1.html)

Identifying differences and similarities between ISO 19988$^{10}$ and ISO 15638 will be an important step towards developing a common data set for the Australian supply chain. This issue, along with identifying the class of data industry is prepared to share, will be an important part of the Freight Hub project during 2020.

Future Opportunities

Industry is ready to work with government to advance the formation of the Hub by engaging in further trials in 2020. Pilot projects targeting specific sectors have the potential to inform the technical and governance requirements of the Hub while also providing evidence to industry of the benefits to business of sharing data. ALC members are already involved in pilot projects.

Conclusion

The development of the Hub will support increases to the efficiency and integrity of Australia’s end-to-end supply chain through provision of accurate, timely and relevant data. Firm undertakings from Government protecting commercial interests will encourage maximum voluntary industry participation.

It is envisaged that the Hub will gather data from a broad range of sources whilst ensuring that any collected data is accurate, timely and relevant. ALC believes that the primary objective of this project should be to use industry, government and other third party datasets to identify and rectify slow points in Australia’s freight network. Further (and future) objectives can include the identification of redundancies and excess capacity, as well as supporting improvements in traceability and integrity in the supply chain.

ALC’s consistent belief is that use of data will significantly enhance supply chain efficiency delivering benefits for governments, the freight and supply chain industry and for the communities we serve. The ALC will continue to support this important national project.

Should you wish to discuss this submission further, I can be contacted at

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$^{10}$ Information Technology – GSI Core Business Vocabulary, which operates in conjunction with ISO19987 Information Technology – EPC Information Services (EPCIS) Standard

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