



Australian Government
Productivity Commission

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Impacts of heavy vehicle reform

Call for submissions

The PC has released this paper to assist individuals and organisations to prepare submissions. It contains and outlines:

- the scope of the study
- our procedures
- matters about which we are seeking comment and information
- how to make a submission.

November 2025

Acknowledgement of Country



The Productivity Commission acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to land, waters and community. We pay our respects to their Cultures, Country and Elders past and present.

About us

The Productivity Commission is the Australian Government's independent research and advisory body on a range of economic, social and environmental issues affecting the welfare of Australians. Its role, expressed most simply, is to help governments make better policies, in the long term interest of the Australian community.

The PC's independence is underpinned by an Act of Parliament. Its processes and outputs are open to public scrutiny and are driven by concern for the wellbeing of the community as a whole.

For more information, visit the PC's website: www.pc.gov.au

Call for submissions

The PC has released this call for submissions to assist individuals and organisations to prepare submissions to the study. It contains and outlines:

- the scope of the study
- our procedures
- matters about which we are seeking comment and information
- how to make a submission (see attachment B).

Participants should not feel that they are restricted to comment only on matters raised in the call for submissions paper. The PC wishes to receive information and comment on issues which participants consider relevant to the study's terms of reference.

Key study dates

Receipt of request for advice	27 September 2025
Due date for submissions	19 December 2025
Release of interim report	March 2026
Final report to Government	June 2026

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About this study

The Australian Government has asked the Productivity Commission to provide advice on the impacts of a heavy vehicle productivity reform package, to support continued National Competition Policy reforms. This reform package aims to increase transport productivity for all heavy vehicles (generally all vehicles above 4.5 tonnes gross vehicle mass, for example trucks and buses) and support the uptake of heavy zero emissions vehicles.

The PC has been asked to provide analysis and modelling for the following reforms:

- Increasing heavy vehicle road access to reduce emissions and increase productivity.
- Accelerating the establishment of a National Automated Access System to streamline road access decision making for all heavy vehicles.
- Accelerating implementation of the National Heavy Vehicle Driver Competency Framework.
- Removing administrative and regulatory barriers to improve the availability of heavy zero emission vehicle charging infrastructure.
- Reducing or removing curfews for heavy zero emission vehicles.

The PC has been asked to deliver an interim report by 31 March 2026 and a final report by 30 June 2026.

How you can contribute

This call for submissions sets out some issues and information requests relevant to the request for advice (attachment A). The PC welcomes comments, evidence and data on these and any other issues related to this study.

Attachment B explains how to make a submission or brief comment. Participants are asked to make submissions by 19 December 2025. Your contribution does not need to be a formal document and we welcome views through the comments section on our website. We also welcome submissions relevant to this study that were developed for other review processes.

The PC will build on the knowledge and submissions made to previous studies related to National Competition Policy reforms, and thanks everyone who provided submissions to these processes.

Heavy vehicle reform package proposals

Increasing heavy vehicle road access to reduce emissions and increase productivity

Vehicles over a specified weight face access restrictions on some roads under the Heavy Vehicle National Law (HVNL). This constrains the uptake of heavy zero-emissions vehicles (EV trucks) and some large, high-productivity freight vehicles. For example, such vehicles may be prohibited from using load limited bridges.

The proposed policy is intended to have two effects:

- Increase productivity, by increasing the amount of freight that can be feasibly carried in each journey on roads where the access restrictions are lowered.
- Reduce emissions, by increasing the potential payload carried by high productivity heavy vehicles and encouraging the uptake of EV trucks relative to internal combustion engine vehicles of a comparable weight.

The request for advice did not contain specific changes to the HVNL to increase road access under this proposal. Options for giving effect to this proposal include increasing axle mass limits, expanding road access networks for certain vehicles, and targeted road infrastructure upgrades. Plausible increases would need to be assumed to estimate the costs and benefits of the reform.



Information request 1

The PC seeks views, data and evidence that would be necessary to analyse and model these regulatory reforms, including:

- appropriate reforms to assess under this proposal, e.g. increases in general mass limits under the HVNL
- additional cost of road wear and infrastructure maintenance
- intersection with other infrastructure barriers necessary to take up reformed regulation
- implementation issues, including how governments should apportion any increased road infrastructure costs between levels of government
- how imported vehicles can comply with both international and domestic standards to allow vehicles (including heavy zero emission vehicles) to be imported without being repurposed
- availability of data on road use, the structure of the road network, and different heavy vehicle users (and user industries).

National Automated Access System

Heavy vehicle operators are required to apply for road access permits to use some roads and other road assets (such as bridges), due to the potential for damage. Applying for permits places an administrative burden on heavy vehicle operators and the time taken to obtain permits could unnecessarily delay or divert services.

This proposal seeks to accelerate the establishment of a National Automated Access System (NAAS). This system would provide instant, automated decisions on network access tailored to each individual vehicle's type, configuration and load – removing the need for most permits (DITRDCSA 2025).

The development of the NAAS has been under review by governments since at least 2023 (Austroads 2023). Existing work on the implementation of the NAAS indicates that it is planned to be based on the Heavy Vehicle Access Management System (HVAMS) in Tasmania (DITRDCSA 2025), which was first introduced in 2016 (TASSIC nd). The Management System allows operators to input their vehicle parameters online into the system to generate a custom map that grants operators road access without applying for permits, including any additional conditions for access such as reduced speeds. This map can be saved to a unique code that can be reused at any time, allowing operators to save maps for different vehicles and setups (Arnett 2021).

Heavy vehicle operators outside Tasmania can use the National Network Map operated by the National Heavy Vehicle Regulator (NHVR) to view the roads that different vehicle configurations have approved or have conditional access to, and where they will need to apply for additional permits (NHVR nd). The regulator currently processes all road access permits for heavy vehicle journeys within and between the ACT, NSW, Queensland, South Australia, Tasmania and Victoria (NHVR nd). Heavy vehicle journeys involving public roads in Western Australia or the Northern Territory require a permit from state road transport authorities (Main Roads nd; Northern Territory Government 2025).

By granting individualised and automatic road access for operators without the need for permits, the National Automated Access System aims to:

- boost supply chain productivity
- optimise the use of road networks
- reduce permits by 90%.



Information request 2

The PC seeks views, data and evidence in relation to this proposal, including:

- future coordination and alignment between the states and territories
- how best to determine which roads might be eligible for automatic access, initially and on an ongoing basis
- the technical and administrative practicalities of scaling up Tasmania's model to the whole of Australia
- the costs and benefits of the current access permit system borne by heavy vehicle operators
- availability of data on road use, the structure of the road network, and different heavy vehicle users (and user industries).

National Heavy Vehicle Driver Competency Framework

The PC has been asked to analyse and model the impacts of accelerating the implementation of the National Heavy Vehicle Driver Competency Framework.

The framework sets minimum competency standards for heavy vehicle drivers (Austroads 2025):

- the set of training and competency assessment requirements that an applicant must satisfy for a Licensing Authority to deem the applicant competent to be issued with a heavy vehicle driver license, and
- the regulatory, policy and administrative arrangements to support the training and competency assessment process.

Austroads conducted a 2018 review of the Framework, released a Consultation Regulatory Impact Statement (RIS) in 2022 and a Decision RIS in 2023. These reports identified the following regulatory failures related to the existing framework:

- Licensing is not sufficiently focussed on key risks.
- Arrangements governing heavy vehicle training and assessment are affecting the quality of driver training.
- Heavy vehicle driver licensing is applied inconsistently (Frontier Economics 2023, pp. 19, 23, 24).

In December 2023, Australia's transport ministers agreed in-principle to proposals from the 2023 National Heavy Vehicle Driver Competency Framework Decision RIS. These proposals include:

- redesigning learning and assessment requirements
- introduction of experience-based progression options
- strengthening training governance (Austroads 2025).

Implementation is scheduled for 2026, beginning with the rollout of training and assessment materials.



Information request 3

The PC seeks views, data and evidence in relation to this proposal, including:

- what are the largest hurdles for timely or accelerated implementation of these reforms
- what federal, state & territory or private bodies are expected to handle the various stages and aspects of implementation
- what timeframes are sensible for accelerated implementation of the reforms
- data relevant to quantitative estimates of productivity impacts of the reforms
- how best to quantify the impact of the reforms.

Barriers to availability of EV truck charging infrastructure

Other reforms potentially being considered in this package will provide greater access to the Australian road network for EV trucks. The uptake of EV trucks requires sufficient charging infrastructure to be in place to support the fleet to operate. This reform involves identifying and reducing barriers to the availability of infrastructure, with the request for advice noting that:

- Charge point operators face a complex regulatory environment and administrative challenges to install and operate charging infrastructure.
- Publicly accessible EV truck charging infrastructure will support productivity by ensuring operators are competitive in a net zero economy.

Possible areas of focus include:

- Regulation impacting the installation of charging infrastructure
- Regulation of charging infrastructure
- Zoning and planning regulation impacting land availability for charging infrastructure, particularly where required at key locations across the road network to provide reliable and efficient charging options for vehicle operators



Information request 4

The PC seeks views data and evidence in relation to this proposal, including:

- regulatory barriers to the roll out of charging infrastructure for battery heavy powered EV trucks
- other practical barriers that may be limiting installation and operation of charging infrastructure
- policy issues affecting the long-term implementation of an effective network of publicly accessible EV truck charging infrastructure.

Curfews for EV trucks

The request for advice proposes ‘reducing or removing curfews’ for EV trucks. It notes that:

- Curfews on heavy vehicle movements restrict when certain heavy vehicles can use specific roads, often to minimise traffic noise particularly in residential areas.
- As EVs are quieter than Internal Combustion Engine vehicles, a reduction or removal of curfews of EV trucks would allow them to operate during non-standard business hours when there is less congestion and freight transit times can be reduced.

Under the Heavy Vehicle National Law, heavy vehicles must abide by the NHVR access map. This governs when and where a particular class of vehicle is allowed to travel. A given road may either be restricted entirely, or subject to a curfew. At present, curfews are based on vehicle class, rather than by emissions type. All vehicles are therefore subject to the same curfews as any other vehicle in a given class.

Additionally, local traffic controls may also be imposed under state and territory regulation – which can include curfews or bans on trucks. Most local curfews apply to all heavy vehicles (and therefore do not discriminate based on whether the vehicle is an EV truck).

The policy proposal could entail reducing or removing one or both types of curfews.

EV trucks could have distinct access maps (which could be more permissive, particularly with regards to curfews). They could also be made exempt from local curfews. However, there would need to be further consideration as to how such a policy change could be practically implemented and enforced.

In the short run, reducing or removing curfews would allow EV trucks to travel at less congested times. This would allow them to more efficiently get to their destination. Other road users would also benefit from being subject to less congestion and fewer heavy vehicles on the road during the day. Further, smoothing out the number of freight trips intertemporally would reduce port and depot congestion.

These benefits would be balanced against, primarily, the noise costs of these vehicles running at night.

There would also be a net effect on safety. On the one hand, EV trucks travelling at night will encounter fewer vehicles and pedestrians, meaning that there are fewer opportunities for an accident to occur. However, *any given interaction* may be more dangerous at night, given worse lighting (which may be exacerbated by the fact that the EVs are quieter, and therefore harder to hear coming) and greater driver fatigue. It is difficult a priori to tell which effect would dominate.



Information request 5

The PC seeks views, data and evidence in relation to this proposal, including:

- comparative noise levels of electric heavy vehicles and internal combustion engine heavy vehicles
- how significantly any noise reduction ameliorates the negative impacts of night-time travel
- implementation considerations, given different levels of government have responsibility for the implementation of curfews, particularly local governments in residential areas
- how the effects of any reform could be quantified, including any data and modelling requirements.

References

Arnott, W 2021, *Tasmania leading the way with productive road access*, *Cranes & Lifting*, 3 February, <https://www.cranesandlifting.com.au/tasmania-leading-the-way-with-productive-road-access/> (accessed 13 October 2025).

Austroads 2023, *Austroads is leading the implementation of a national automated access system for heavy vehicles* | Austroads, <https://austroads.gov.au/latest-news/austroads-is-leading-the-implementation-of-a-national-automated-access-system-for-heavy-vehicles> (accessed 11 November 2025).

— 2025, *National Heavy Vehicle Driver Competency Framework*, Austroads, <https://austroads.gov.au/drivers-and-vehicles/registration-and-licensing/heavy-vehicle-driver-competency-framework> (accessed 27 October 2025).

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Frontier Economics 2023, *Decision Regulatory Impact Statement – National Heavy Vehicle Driver Competency Framework*, Austroads.

Main Roads nd, *Permits and Orders*, <https://www.mainroads.wa.gov.au/heavy-vehicles/permit-order-scheme/> (accessed 29 October 2025).

NHVR (National Heavy Vehicle Regulator) nd, *Access permit application process*, <https://www.nhvr.gov.au/road-access/access-management/applications> (accessed 29 October 2025a).

— nd, *National Network Map*, <https://www.nhvr.gov.au/road-access/route-planner/national-network-map> (accessed 21 October 2025b).

Northern Territory Government 2025, *Oversize or overmass vehicles*, <https://nt.gov.au>, <https://nt.gov.au/driving/heavy/oversize-or-overmass-vehicles> (accessed 29 October 2025).

TASSIC (Tasmanian Spatial Information Council) nd, *Case study: Heavy vehicle access management system*.

A. Request for advice

I am writing to request advice from the Productivity Commission (PC) on the impacts of a heavy vehicle productivity reform package. This advice will support continued pro-competitive reform under National Competition Policy (NCP). This reform package aims to increase transport productivity for all heavy vehicles and support the uptake of heavy zero emissions vehicles (HZEVs).

To support this work, I am requesting advice from the PC, pursuant to Parts 2 and 4 of the *Productivity Commission Act 1998*, in the form of analysis and modelling for the following reforms (with further detail in attachment A):

- Increasing heavy vehicle road access to reduce emissions and increase productivity.
- Accelerating the establishment of a National Automated Access System to streamline road access decision making for all heavy vehicles.
- Accelerating implementation of the National Heavy Vehicle Driver Competency Framework.
- Removing administrative and regulatory barriers to improve the availability of HZEV charging infrastructure.
- Reducing or removing curfews for HZEVs.

For each of these reforms, the PC should:

- provide an assessment of the economic and revenue impacts, including expected:
 - impacts on GDP, GSP, dynamic efficiency and other measures of economic progress and national prosperity
 - costs and benefits for Australian households, including:
 - » estimated impacts on aggregate measures of incomes, prices and wages
 - » distributional impacts, where possible, including by age, gender, income and education, and any other relevant demographic classification (including impacts on First Nations Australians) Tuesday, 30 September 2025
 - » other impacts on consumers that may be difficult to quantify, such as improved quality of service or wellbeing, or greater choice.
 - impacts on relevant industries and sectors. To the extent possible, this should include estimated impacts on sectoral output, prices, productivity, employment and growth
 - net additional revenue accruing to the Commonwealth, state, territory and local governments.

The PC will consult as required, including with the Australian, state and territory and local governments in completing this advice. The advice should include an explanation of the methodology, assumptions and sensitivity analysis showing how results change under different assumptions.

The PC should provide an interim report, including initial modelling outcomes, to the Government by 31 March 2026 and a final report by 30 June 2026.

Yours sincerely

The Hon Jim Chalmers MP

[Received 30 September 2025]

Attachment A – Further detail on the heavy vehicle productivity reform package

The Commonwealth is seeking to work with the states and territories to progress a package of heavy vehicle productivity reforms via a revitalised NCP agenda.

The road access reform package aims to increase transport productivity for all heavy vehicles and support the uptake of heavy zero-emissions vehicles (HZEVs).

The reforms are detailed below:

Increasing road access to reduce emissions and increase productivity

- There are current restrictions on which roads heavy vehicles are allowed to operate on. This disadvantages HZEVs and high-productivity freight vehicles due to their additional weight, reducing their potential payload and productivity compared to their Internal Combustion Engine (ICE)-driven counterparts.
- Actions to get more road freight carried by HZEVs and high-productivity freight vehicles would help reduce emissions and boost productivity as more payload can be carried in each journey. This could include increasing axle mass limits, expanding road access networks for certain vehicles, and targeted road infrastructure upgrades.

Accelerating the establishment of a National Automated Access System (NAAS)

- Vehicles above general mass limits face restricted road access due to the damage they cause to roads or the ability of road assets (such as bridges) to withstand the weight of the vehicle. In these instances, operators may be required to apply for a road access permit, which is an administratively burdensome and a time-consuming process.
- Accelerating establishment of the NAAS based on the Heavy Vehicle Access Management System (HVAMS) will boost supply chain productivity, optimise use of road networks, achieve ITMM's commitment to reduce permits by 90%, and is a high priority for industry.
- A NAAS based on the proven architecture of HVAMS will remove the need for most permits and provide instant decisions on network access, highly-tailored to individual truck combinations and loads.

Accelerating implementation of reforms to the National Heavy Vehicle Driver Competency Framework (NHVDCF)

- Operating high productivity vehicles requires qualified drivers, who must hold the appropriate class of heavy vehicle (HV) licence. With driver shortages – and an ageing workforce nearing retirement – faster licence progression is a critical enabler to realising the productivity potential of high productivity vehicles (HPVs).
- The NHVDCF reforms will address driver shortages by providing improved training and assessment outcomes and accelerate experience-based progression for drivers through HV licence classes

Reducing or removing curfews for HZEVs

- Curfews on heavy vehicle movements restrict when certain heavy vehicles can use specific roads, often to minimise traffic noise particularly in residential areas.
- As HZEVs are quieter than ICE heavy vehicles, a reduction or removal of curfews of HZEVs would allow them to operate during non-standard business hours when there is less congestion and freight transit times can be reduced.

Removing regulatory barriers to improve the availability of charging infrastructure

- The future of Australia's HZEV fleet needs charging infrastructure that is optimised to reduce vehicle charging time during long trips.
- Charge point operators face a complex regulatory environment and administrative challenges to install and operate charging infrastructure.
- Publicly accessible HZEV charging infrastructure will support productivity by ensuring operators are competitive in a net zero economy.

B. How to make a submission

How to prepare a submission

Written submissions may range from a short comment outlining your views on a particular topic to a much more substantial document covering a range of issues. Where possible, you should provide evidence, such as relevant data and documentation, to support your views.

Publishing submissions

- Each submission, except for any attachment supplied in confidence, will be published on the PC's website shortly after receipt, and will remain there indefinitely as a public document.
- The PC reserves the right to not publish material on its website that is offensive, potentially defamatory, or clearly out of scope for the study in question.

Copyright

- Copyright in submissions sent to the PC resides with the author(s), not with the PC.
- Do not send us material for which you are not the copyright owner – such as pictures, photos and newspaper articles – you should just reference or link to this material in your submission.

In confidence material

- This is a public review and all submissions should be provided as public documents that can be placed on the PC's website for others to read and comment on. However, information which is of a confidential nature or which is submitted in confidence can be treated as such by the PC, provided the cause for such treatment is shown.
- The PC may also request a non-confidential summary of the confidential material it is given, or the reasons why a summary cannot be provided.
- Material supplied in confidence should be clearly marked 'IN CONFIDENCE' and be in a separate attachment to non-confidential material.
- You are encouraged to contact the PC for further information and advice before submitting such material.

Privacy

- For privacy reasons, all **personal** details (e.g. home and email address, signatures and phone numbers) will be removed before they are published on the website.
- You may wish to remain anonymous or use a pseudonym. Please note that, if you choose to remain anonymous or use a pseudonym, the PC may place less weight on your submission.

Technical tips

- The PC prefers to receive submissions as a Microsoft Word (.docx) files. PDF files are acceptable if produced from a Word document or similar text-based software. You may wish to search the internet on how to make your documents more accessible or for the more technical, follow advice from Web Content Accessibility Guidelines (WCAG) 2.0: <https://www.w3.org/TR/WCAG20/>
- Do not send password protected files.
- Track changes, editing marks, hidden text and internal links should be removed from submissions.

- To minimise linking problems, type the full web address (for example, <https://www.referred-website.com/folder/file-name.html>).

How to lodge a submission

Submissions should be lodged using the online form on the PC's website. Submissions lodged by post should be accompanied by a submission cover sheet, available from the PC's website.

Online* www.pc.gov.au/inquiries-and-research/heavy-vehicle-reform

Post* **Impacts of heavy vehicle reform**
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Phone Please contact the Administrative Officer on 03 9653 2298

* If you do not receive notification of receipt of your submission to the PC, please contact the Administrative Officer.

Due date for submissions

Please send submissions to the PC by **Friday 19 December 2025**.