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Productivity Commission
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Dear Productivity Commission,

IMPACT OF HEAVY VEHICLE REFORM

The Australian Rail Track Corporation (ARTC) welcomes the opportunity to provide a submission to the Productivity Commission's study on the *Impacts of Heavy Vehicle Reform*. ARTC supports reforms that enhance supply chain productivity, resilience and emissions reduction, as part of a broader national competition and net zero agenda. ARTC understands that heavy vehicle reform can deliver improved outcomes across the entire network, and is committed to working with government and industry to support this.

ARTC owns, operates and manages significant parts of Australia's interstate and regional freight rail networks. Rail freight and heavy vehicles both play essential roles in Australia's freight task, with road transport providing critical first- and last-mile connections to rail. Our experience is particularly relevant as we connect different freight networks with overlapping policy priorities:

- as a freight infrastructure manager and access provider operating under economic regulation, with insight into how pricing and investment signals shape long-term freight decisions
- as a system participant that relies on safe and efficient interfaces between heavy vehicles and rail (especially at level crossings and in intermodal precincts)
- as a partner to the road freight industry in delivering end-to-end, multi-modal freight solutions and helping achieve national emissions-reduction goals.

ARTC recognises that the strength of Australia's freight network lies in road and rail working in partnership to deliver seamless connectivity. The most efficient, safe and sustainable freight system is one where:

- road and rail each do the tasks they are best suited to
- pricing, planning and regulation are mode-neutral and evidence-based; and
- safety and congestion impacts are fully considered, given their substantial economic and social costs.

SUMMARY OF ARTC'S POSITION

Reform Activity	ARTC Position
Increasing road access to reduce emissions and increase productivity	ARTC suggests that there is a need to ensure that infrastructure impacts are funded, rail is not further disadvantaged on key linehaul corridors, and rail-interface safety is improved.
Accelerating the establishment of a National Automated Access System (NAAS)	This should be based on robust asset and constraint data (including rail interfaces) and ensure it does not lock in overly permissive access without matching price signals and aligns with future road pricing and regulation.
Accelerating reforms to the National Heavy Vehicle Driver Competency Framework (NHVDCF)	Support accelerating implementation as a key enabler of safely operating High Productivity Vehicles (HPVs) and addressing driver shortages, with faster, experience-based licence progression backed by strong training and assessment, including around rail interfaces.
Reducing or removing curfews for Heavy Zero-Emissions Vehicles (HZEVs)	Well-designed curfew reforms for HZEVs can enable more off-peak movements and optimise supply chain interactions, but only where night-time safety, community amenity and interactions with rail are properly managed and evidenced.
Removing regulatory barriers to HZEV charging infrastructure	Support removing unnecessary regulatory and administrative barriers so charging can be rolled out at scale, with infrastructure planned to complement rail and enable efficient intermodal operations (intermodal terminals and rail-served logistics hubs), rather than extending long-haul road contestability into structurally rail-efficient corridors.

Across all reforms, ARTC emphasises:	• **Safety and congestion as core criteria,** not secondary considerations, in assessing all reforms. • **Net-zero across modes, not just road**, with emissions assessed at a corridor level (road + rail combined). • **Competitive neutrality between modes**, with cost-reflective heavy vehicle charges and no further widening of existing structural cost gaps between road and rail.

ABOUT ARTC AND THE MULTIMODAL FREIGHT TASK

ARTC's network provides the backbone of the interstate and regional rail freight system, including:

- the North–South corridor between Brisbane, Sydney and Melbourne
- East–West links from Melbourne and Sydney to Adelaide and Perth
- regional routes serving bulk and intermodal freight.

Rail corridors interface with heavy vehicles:

- at intermodal terminals and rail-served logistics precincts
- at level crossings on urban and regional networks
- within freight precincts that sit alongside major highways.

Most containerised and many bulk rail freight journeys start and end on roads. Efficient, safe heavy vehicle access to rail-served terminals is therefore central to ARTC's and our customers' interests. A well-designed heavy vehicle reform package should:

- lift productivity for appropriate road tasks
- protect and grow rail's share where it is structurally more efficient and results in lower emissions
- improve the performance and safety of the whole freight system, rather than one mode in isolation.

RESPONSES TO SPECIFIC REFORMS

1. Increasing road access to reduce emissions and increase productivity

What ARTC would like the Commission to test

ARTC encourages the Commission to explicitly test:

- Mode shift impacts on major rail corridors under different access and pricing scenarios.
- Infrastructure and safety costs, including at level crossings and along parallel road–rail alignments.
- Net emissions outcomes, comparing "more efficient road only" and "road + rail optimisation" scenarios, with and without stronger rail mode share.

Safeguards should be considered

ARTC supports efforts to reduce emissions, but recommends the following safeguards:

- Infrastructure impacts are assessed and funded: higher masses and wider access will increase pavement and bridge wear; upgrades and maintenance must be transparently costed and funded.
- Road access changes do not further disadvantage rail on key linehaul corridors where rail is structurally more efficient and already pays higher access charges.
- Rail-interface safety is improved, particularly at level crossings, near terminals and along closely aligned road-rail corridors, with safety and congestion impacts explicitly modelled and monetised.

Net-zero across modes, not just road

Decarbonisation should be assessed across the whole corridor, with emissions considered for road and rail combined, rather than only on a per-truck or per-kilometre basis.

On many long-haul, high-volume tasks, increased rail mode share remains the lowest-cost decarbonisation option, even when HZEV HPVs are available. The Commission's analysis should therefore compare:

- scenarios that rely primarily on more productive or zero-emissions road freight; and
- scenarios that also increase rail's share on suitable corridors.

How increased road access should be designed

Any expansion of road access should:

- target higher masses and expanded networks to defined freight routes, supported by necessary upgrades and cost-reflective heavy vehicle charges, rather than system-wide relaxation of limits.
- use tools like NAAS and telematics to manage routes, bridge and pavement constraints, and operating conditions, especially near corridors, terminals and level crossings.

Intermodal focus, not road-only competition

To optimise the freight system rather than intensify road-rail competition:

- higher-mass HZEV/HPV access should be prioritised to intermodal terminals and rail-served logistics hubs to support better truck–train coordination and reduced empty running.
- reforms should avoid extending long-haul road contestability into corridors where rail can deliver structurally lower-cost, lower-emissions outcomes.
- At ports, policy should prioritise efficient rail access and terminal capability, with complementary HZEV/HPV access into rail-served port precincts, rather than road-only solutions that undermine mode shift to rail and add congestion.

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

To be effective and safe, NAAS should:

- be built on robust, up-to-date asset and constraint data, including information about rail interfaces (level crossings, terminal precincts, shared corridors and structures with bridge-strike risk) so higher-mass access does not increase safety risks or asset damage
- avoid locking in overly permissive access settings without matching price signals, or pre-empting how future road pricing and economic regulation should operate
- include governance arrangements that ensure:
    - national consistency of core rules
    - clear accountability for data quality (road managers, NHVR, local governments); and
    - the ability to embed rail-interface constraints explicitly in automated access decisions (for example, short stacking distances at level crossings, queuing risks near terminals and bridge-strike risk for low-clearance structures)

ARTC also sees opportunities for NAAS to draw on lessons from rail access management. these include transparent network condition reporting, rules for constrained sections, clear commercial agreements setting out liabilities, indemnities, risk management and pricing, and clear customer communication about restrictions and upgrades.

3. Accelerating implementation of NHV Driver Competency Framework reforms

ARTC supports accelerating the implementation of reforms to the National Heavy Vehicle Driver Competency Framework (NHVDCF) as a key enabler of:

- safely operating HPVs
- addressing heavy vehicle driver shortages
- improving safety outcomes on shared road–rail corridors.

This is particularly important given that heavy vehicles are involved in a disproportionate share of accidents and near hits at level crossings. On the ARTC network, heavy vehicles account for 30% of collisions and near hits at level crossings[1], despite heavy vehicles making up only 2% of all vehicles on Australian roads.[2]

Faster, experience-based progression through heavy vehicle licence classes, backed by stronger training and assessment, can:

- help unlock the productivity benefits of HPVs; while
- maintaining high safety standards, including around rail interfaces and level crossings.

From ARTC's perspective, it is important that:

- rail-interface safety (behaviour at level crossings, near yards and terminals) is incorporated into training content
- fatigue management and night-operations training is strengthened, particularly if more off-peak HZEV movements are encouraged
- reforms are implemented consistently across jurisdictions so that operators running interstate freight have a clear and stable competency framework.

[1] Data from ARTC 2021 – 2025.

[2] Opinion: Crossing to the Same Side | ONRSR

4. Reducing or removing curfews for HZEVs

ARTC recognises that HZEVs are quieter than internal combustion engine (ICE) heavy vehicles and that easing curfews could enable more off-peak operations and help optimise the freight supply chain.

Curfew reforms should be carefully designed and require:

- evidence-based assessment of noise impacts (including non-drivetrain noise) and community expectations in affected areas
- strong attention to night-time safety, including fatigue, visibility and low-noise detectability for other road users and pedestrians
- specific consideration of interactions with rail operations, particularly near terminals, ports, intermodal hubs and urban rail corridors where increased night-time truck movements may heighten level-crossing risk, extend closure times and affect passenger rail reliability.

A sensible approach may involve:

- piloting curfew changes on selected freight corridors with limited residential frontage and low rail-interface risk
- monitoring noise, crash and near-miss data, and community feedback
- retaining the ability to adjust or reverse curfew changes if adverse impacts emerge.

5. Removing regulatory barriers to HZEV charging infrastructure

ARTC supports removing unnecessary regulatory and administrative barriers to HZEV charging infrastructure so it can be rolled out at scale and support a competitive, net zero freight sector.

From a multimodal perspective, it is critical that:

- charging infrastructure is planned to complement rail, not compete with it unnecessarily
- major HZEV charging hubs are located at or near intermodal terminals and rail-served logistics hubs, enabling efficient truck–train coordination and minimising empty running
- publicly supported charging infrastructure does not simply extend long-haul road contestability on corridors where rail is structurally more efficient and offers better emissions outcomes.

Planning and approval frameworks should:

- streamline approvals for charging in strategic freight precincts
- encourage co-location of charging, warehousing and rail facilities
- address electricity network capacity and reliability constraints in freight precincts
- ensure open access and fair pricing where public funds are involved.

Cross-Cutting Considerations

Safety and congestion as core criteria

The costs of road crashes accidents and congestion on major freight corridors are substantial. ARTC recommends that the Commission:

- treat safety and congestion as primary assessment criteria for all reforms, not secondary or qualitative factors
- quantify, where possible, the change in crash risk, trauma costs, travel time and reliability under different reform scenarios
- pay particular attention to safety at rail–road interfaces and congestion on approaches to key freight precincts, including rail precincts where increased heavy vehicle activity can directly impact rail performance and terminal throughput, and areas where freight and commuter traffic interact heavily.

Pricing and competitive neutrality

ARTC supports reforms that are:

- mode-neutral, ensuring that infrastructure and external costs for heavy vehicles (wear, congestion, safety, emissions) are transparently and efficiently recovered
- consistent with long-term road pricing reform and with rail access charging on key corridors.

The Commission's analysis should consider:

- how expanded HPV/HZEV access interacts with current and future heavy vehicle charging, including differences between PAYGO-based road funding and closer-to-full economic cost recovery and regulatory requirements for rail

- whether the heavy vehicle reform package, taken as a whole, narrows or widens existing structural cost gaps between road and rail.

Evaluation and governance

Given the interconnected nature of the reforms, ARTC supports:

- establishing clear baseline metrics and evaluation frameworks for each reform (including multimodal safety, emissions, congestion and mode share indicators)

a national governance arrangement that ensures road, rail and port/terminal infrastructure managers jointly assess corridor and precinct impacts before major access or curfew changes are implemented.

CONCLUSION

ARTC welcomes the Productivity Commission's work on the *Impacts of Heavy Vehicle Reform* and supports a reform package that:

- lifts freight productivity and support HZEV uptake
- is grounded in safety, congestion and infrastructure realities
- is mode-neutral and recognises the central role of rail as the long-haul, low-emissions backbone of the freight system
- strengthens, rather than undermines, the partnership between road and rail in delivering efficient, safe and sustainable freight services.

ARTC would be pleased to engage further with the Commission, including by providing corridor-specific data on safety, traffic interactions and infrastructure condition to support detailed testing of multimodal impacts on key freight routes. Please contact our General Manager – Policy and Regulation, **Susan Furze** if you would like to discuss further.

Yours Sincerely,

Jade Hooper
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Australian Rail Track Corporation (ARTC)