Impacts of Heavy Vehicle Reform

Tasmanian Government Submission

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Department of State Growth

Tasmanian Government

Contents

Executive Summary

Tasmania welcomes the opportunity to contribute to the Productivity Commission's study into the impacts of heavy vehicle reforms. These reforms are complex, and critical to improving freight productivity, reducing emissions and ensuring safe and efficient road use.

This study will inform existing reforms being progressed under the Infrastructure and Transport Ministers' Meeting (ITMM), including increasing heavy vehicle road access, establishing the National Automated Access System (NAAS) and National Heavy Vehicle Driver Competency Framework (NHVDCF).

These reform areas must be considered in the context of the need to address infrastructure capacity constraints and funding challenges. To support heavy vehicle productivity, road user charging reform must progress to ensure equitable charges are levied on operators. Charges should reflect operator's heavy vehicle combination impacts (i.e. its configuration, loading scenario and usage), and the distribution of revenue to road managers can adequately fund road maintenance and upgrade construction.

Reform of road user charging has the potential to address many of the access related issues that are largely the result of inadequacies with the current road charging and distribution model. There is an opportunity to optimise the way in which road access issues are being addressed. Road access is being considered through separate projects and reviews including through the National Transport Commission (NTC) Heavy Vehicle National Law review, National Heavy Vehicle Regulator (NHVR) and Austroads projects, without a link to the charging framework.

While the request put to the Productivity Commission focuses on supporting the uptake of heavy zero emissions vehicles (HZEVs), Tasmania considers that there is also role for heavy low emissions vehicles to improve productivity and reduce emissions. This is reflected in investment in low carbon liquid fuels and supporting infrastructure.

The uptake of heavy low/zero emissions vehicles (LZEVs) needs to be a shift from heavy vehicles rather than from other freight modes (i.e. rail) to ensure the objectives of the reforms are met. The Tasmanian Government *Transport Emissions Reduction and Resilience Plan 2024-29* contains actions to support the uptake of heavy LZEVs recognising the barriers that exist for industry.

Tasmania's submission responds to the Productivity Commission's Information Requests, providing Tasmania's perspective on increasing productivity, as well as NAAS and HVDCF implementation. Information is also provided on Tasmania's experience with barriers to installing charging infrastructure and EV curfews.

Tasmania strongly supports reforms that balance productivity, safety, and environmental outcomes while recognising the constraints of smaller jurisdictions, particularly in relation to road funding.

Information request 1: Increasing heavy vehicle road access to reduce emissions and increase productivity

Access for larger or heavier vehicles is reliant on a number of factors including safety, infrastructure capacity and amenity issues. Improving access for larger or heavier freight vehicles certainly boosts productivity with consequential emissions reduction benefits.

Increased mass limits will have an impact on asset lives, with a potential decrease in remaining life of road pavements, road seals and bridge structures. This effectively means that road and bridge renewals will occur sooner than expected, which will increase the asset renewal spend required across the road network. This will impact on annual maintenance budgets, with more LZEVs on the road likely to result in more road wear and general road maintenance activities.

For example, if vehicle tare weights increase with LZEVs to deliver the same freight task it will result in increased pavement wear either as a result of higher axle loading or additional heavy vehicle journeys if axle loading is constrained. The relationship between axle loading and pavement wear is exponential, not linear. This means relatively small increases may result in dramatically reducing pavement life and accelerating renewal rates.

Further work is required to quantify what the actual change in asset life and increase maintenance will be, or any offset from higher productivity vehicles reducing truck movements to move the same quantity of goods. Austroads project NEF6392 *Future freight vehicles and buses – implications for road managers,* which is understood to be nearing completion, is expected to provide important data and insights on this issue.

Regarding the improvement of design guidance for larger vehicles, Austroads project NEF6394 (*Designing roads for large freight vehicles*) looked at geometric design requirements needed to accommodate large freight vehicles. The project's report *AP-R745-52 Synthesis of Design Requirements for Large Freight Vehicles* was published in December 2025 and Austroads has commenced a project to progress recommendations from the report into the Australian Guide to Road Design.

For access to be maximised, infrastructure capacity constraints would need to be addressed, including ensuring that roads and pavements are constructed to a standard that supports the size and axle loadings of these vehicles.

Increasing heavy vehicle access will therefore require additional funding to pay for increased maintenance, bring forward asset replacement and upgrade specifications of roads.

Tasmania supports the system approach where a heavy vehicle's operational metrics are captured in a highly granulated way and matched against well granulated road and bridge capacity metrics so that road managers can provide the best levels of access on the assets they manage. This is a fundamental principle of the Heavy Vehicle Access Management System (HVAMS) which is the foundation of the National Automated Access System (NAAS). The benefits of this approach are explored in the next section.

With the road freight task projected to increase by 77 per cent between 2022 and 2050[1] and if tourism visitation continues to increase, it is likely that there will be more heavy vehicles movements across our state road network rather than a reduction. Taking a system approach will provide the safest and most efficient approach to providing access with a growing number of heavy vehicle movements rather than a permit-based approach or attempting to manipulate general access mass limits without taking into account any network deficiencies.

It is critical that an appropriate charging mechanism is developed, particularly with a future transition from liquid fuel usage through which revenue is derived. This framework should not only consider LZEVs but also extend to examples such as certain performance based standards (PBS) vehicles that are not paying a registration fee commensurate to the amount of pavement wear that results.

Work on road user charging should be progressed to determine how to apportion increased road infrastructure costs between levels of government so that it is distributed to road owners/managers based on the usage and pavement wear by heavy vehicles.

A charging framework should reflect the asset consumption by a vehicle and its loading scenario and provide road managers with revenue that reflects the vehicles that use their roads. In turn road managers can be incentivised through this mechanism to improve the standard of the roads and access available.

[1] DITRDCA Australian aggregate freight forecasts

Through ITMM, Transport Ministers have asked the National Transport Commission to consult on a forward-looking cost base (FLCB) as an alternative to the current pay-as-you-go model to set heavy vehicle charges. Consultation is expected to commence in early 2026[2].

To date, Department of State Growth has not received requests from the road freight industry to operate LZEVs above existing axle mass limits. There are some LZEV buses in operation, however these have not sought to operate with masses higher than existing limits.

Information request 2: National Automated Access System

The National Automated Access System (NAAS) is progressing based on the successful Tasmanian Heavy Vehicle Access Management System (HVAMS) that has been in operation and ongoing development since 2016.

Tasmania's experience with HVAMS has demonstrated there are significant economic benefits for industry and road managers[3].

The NAAS intends to create a single, seamless, national access assessment system that removes the need for 90 per cent or more of heavy vehicle permit requests.

Fundamentally the NAAS provides an efficient way to determine the capacity of assets to accommodate vehicles that have higher gross mass, have heavier axle masses, or are configured with unique axle spacing configurations. The NAAS also can be used to determine safe levels of access for a particular vehicle based on geometric and other constraints on the road network.

It allows the specific vehicle parameters (e.g. vehicle type, axle spacing, tyres, loaded masses, performance parameters) to be saved as a unique code. The code can then be used to retrieve a network map, or guidance on specific routes of interest. This ensures that operators immediately receive the best possible access following an infrastructure improvement or are informed in the event of an issue and can consider alternative route. It also enables industry to adjust vehicles and loads to suit the constraints of road assets which optimises their use of the existing network.

The NAAS will be able to accommodate the existing assessment methods of different road managers in how they manager their assets and make access decisions. This approach will ensure road managers can remain consistent with their local policies and legislative obligations while delivering a coordinated and aligned national approach.

Data requirements and collection from road manages is therefore critical to the NAAS although it is separate to the system build. One of the key factors to Tasmania's success with HVAMS was the state government working closely with local government road mangers so they could provide their asset data. A combination of funding and state support for local governments was essential and this will need to be prioritised with the NAAS development.

Data from the NAAS will also help to inform governments where infrastructure constrains exist and which vehicles are affected. This information will provide an evidence base to prioritise infrastructure investment that will deliver the greatest safety and efficiency gains.

[2] National Transport Commission 2025, *Heavy vehicle charges consultation report,* https://www.ntc.gov.au/sites/default/files/assets/files/Heavy%20Vehicle%20Charges%20Consultation%202026-27_0.pdf

[3] HoustonKemp Economists 2022, *Cost benefit analysis of extending the Heavy Vehicle Access Management System to Special Purpose Vehicles*, https://www.transport.tas.gov.au/__data/assets/pdf_file/0012/405003/HVAMS_CBA_Final_Report_16_Nov_22.pdf

Information request 3: National Heavy Vehicle Driver Competency Framework

In line with the Decision Regulation Impact Statement (DRIS) approved by Ministers at the Infrastructure and Transport Ministers Meeting (ITMM) in December 2023, the National Heavy Vehicle Driver Competency Framework (NHVDCF) project, led by Austroads, aims to ensure a nationally consistent standard of training and assessment, including:

- all training delivered against a standard set of materials, covering the competencies agreed in the DRIS
- all assessment delivered in a consistent and harmonised way to ensure that training is delivered to the same standard across Australia
- comparable assessment of driver skills and aptitude, whether they have been trained by a provider or progress through an alternative driver experience pathway.

Austroads is working with jurisdictions to complete the design of two Progression Pathways:

- Driving Experience Pathway: Where drivers complete a specified number of driving hours to expedite license progression; and
- Supervision Program Pathway: Where specified hours will be a combination of both solo driving experience, with a minimum of driving hours with the accredited supervisor.

These pathways were recommended to ITMM to be implemented in addition to existing tenure-based licence progression pathways. At the March 2025 Implementation Group meeting, the committee agreed to establish a dedicated Working Group to advance work on Alternative Progression Pathways, with Terms of Reference subsequently developed and approved. The Alternative Progression Pathways (APP) Working Group is coordinated and Chaired by Austroads.

Regulatory changes are necessary to facilitate implementation of the NHVDCF. Work on these changes in Tasmania will begin in the first quarter of 2026 and is anticipated to require approximately 18 months for completion.

The primary challenges for Tasmania in relation to these reforms include:

- Timing of harmonisation across all jurisdictions.
- Costs of implementation, followed by ongoing management and resourcing requirements.
- Sustaining the financial and operational capacity needed for successful implementation.

As a small jurisdiction, Tasmania faces additional constraints, as engagement in and implementation of these reforms are being managed as supplementary duties alongside core functions.

The other Government bodies involved in this project are:

- National Transport Commission (NTC)
- Registration and Licensing Taskforce (RLTF)
- Austroads
- Infrastructure and Transport Senior Officials Committee (ITSOC)
- Infrastructure and Transport Ministers Meetings (ITMM)
- All other Australian licensing jurisdictions

At present, sustainable cost recovery and implementation alignment are identified as significant project risks to the delivery of the NHVDCF. While Austroads has initiated the development of a cost-benefit analysis tool and an evaluation framework to facilitate jurisdictional planning and impact assessments,

the associated costs for jurisdictions remain unclear. The Evaluation Framework will define how program benefits are measured over time, including data sources and evaluation timeframes.

Each jurisdiction must conduct its own planning to facilitate implementation of the proposed reforms. At this point in the project, a comprehensive assessment of jurisdictional timing for harmonised implementation remains unclear. Some jurisdictions, including Tasmania, have stated that they are unable to commit to implementing the Learning Management System until there is greater transparency regarding cost recovery.

Austroads has reported strong industry support for NHVDCF reforms following the ITSOC roundtable and has called for accelerated implementation.

Much of what will be required cannot yet be specified until the project is further progressed. For Tasmania the proposed changes will require regulation change, significant and complex system reconfiguration, and additional financial and human resource requirements. The Cost Benefit Analysis and Evaluation Frameworks will help Tasmania understand the full financial impact. We still need to address details about progression pathways, trialling the Learning Management System, and updating the Competency Framework. Consensus on these pathways and transitional arrangements will further clarify costs. Subject to the provision of additional information regarding costings and relevant budget approvals, implementation in Tasmania is anticipated for the 2027-28 period.

Information request 4: Barriers to availability of EV truck charging infrastructure

There are no known regulatory barriers preventing the installation of charging infrastructure. Most regulation exists to address legitimate community expectations in relation to protecting people, places, products and property. However, should disproportionate regulatory barriers be identified, amendments to regulation to remove these barriers is consistent with the Tasmanian Government's commitment to reducing red tape.

There are recent examples of successful private investment in EV charging infrastructure. In November 2025, Tas Petroleum opened a new site at Legana including charging infrastructure for heavy vehicles. Tas Petroleum has also reported it is looking to expand its presence in the South of the state.

Other issues may delay charge stations being installed, including low demand, electrical network capacity and installation costs.

Information request 5: Curfews for EV trucks

Department of State Growth does not currently impose any noise related travel restrictions on heavy vehicles. Additionally, State Growth is not aware of local government imposing such restrictions in Tasmania.

Some business operations have limitations on their operating hours which in some instances may arise from noise related restrictions, which in turn limit transport activity to their sites.

While road managers may use curfews to mitigate the noise impact of heavy vehicles, time of travel restrictions may also be used to:

- Manage traffic congestion during peak hours.
- Enhance safety. The size and mass of heavy vehicles influence the speed they can travel, their manoeuvrability and their stopping distances. Some limitations on operational times of the larger restricted access vehicles may be put in place to mitigate congestion issues during peak hours,

or to minimise interactions with school buses on school bus routes involving narrow roads to address the risk of accidents.

Curfews may also be imposed in some jurisdictions or by individual road managers to minimise noise associated with loading/unloading deliveries in noise-sensitive areas.

In Tasmania, restrictions relate to larger vehicles in certain locations to mitigate safety and congestion. These include:

- For oversize – over mass vehicles with widths exceeding 3.5m time of travel restrictions limit travel to times outside of morning and afternoon peak periods on several state roads in greater Hobart, Launceston, and Burnie.
- Similarly for some longer freight vehicles (e.g. >30m long high productivity freight vehicles) for travel through Launceston. Currently these do not have access through Hobart or over the Tasman Bridge, however if/when this occurs similar time of travel restrictions would be envisaged.
- Limitations on travel for some larger restricted access heavy vehicles for travel at times where school buses are delivering students to or from school on some routes involving relatively narrow or constrained road widths.

These restrictions would not be mitigated by a change to a quieter vehicle such as a LZEV because they do not relate to noise.

Numerous complaints are received each year to both State Growth, but also to local government road managers and the NHVR in relation to noise of some heavy vehicles, particularly relating to the noise impacts of inappropriate use of engine compression brakes in built up areas or close to houses in rural areas.

State Growth currently attempts to deal with these issues through direct discussions with identified transport companies, the companies whose freight task it is, the industry associations along with seeking enforcement action by the NHVR in some instances.

The promise of LZEVs that operate with reduced noise (e.g. engine / motor / braking) offers a great potential benefit to reduce the impact of noise disturbance of residents who live on freight routes. They may also offer the potential for businesses which currently choose to limit hours of operation in relation to vehicle noise to extend those operational hours with a potential associated productivity gain.

Conclusion

Tasmania supports further work to understand the impact of the heavy vehicle reforms to encourage the uptake of LZEVs, provided that these are carefully balanced with the needs of road managers, infrastructure owners, industry, and other road users.

There are a number of initiatives underway to improve the productivity, safety and reduce environmental impacts of heavy vehicle usage in Australia. Those of particular interest to Tasmania include progress on the NAAS and the NHVDCF.

Of course, increased adoption of LZEVs supports work being done in Tasmania on our net-zero by 2030 target. Issues such as improving access for larger and heavier freight vehicles should be considered within the context of safety, amenity and infrastructure impacts.

The Tasmanian Government looks forward to working further with the Commission should it require further evidence or explanation on those issues that have been raised in this submission.

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