



Productivity Commission
Locked Bag 2, Collins St East
Melbourne, Victoria, 8003

E: ncp@pc.gov.au

Dear Productivity Commission,

RE: IMPACT OF HEAVY VEHICLE REFORM

Thank you for the opportunity to offer comment on the Productivity Commission's study on the Impacts of Heavy Vehicle Reform.

The AFGC is the leading national organisation representing Australia's \$172.7 billion food, beverage and grocery manufacturing sector – the makers of the essential food and grocery products Australians know and trust every day. The industry has a clear objective, outlined in Sustaining Australia: Food and Grocery Manufacturing 2030, of expanding its role in domestic manufacturing, jobs growth, higher exports and enhancing the sovereign capability of the entire sector.

The sector relies on efficient, reliable freight movement across major corridors and local roads. Heavy vehicle reform impact delivery reliability, cost efficiency and safety which are critical factors for keeping shelves stocked and reducing food waste by ensuring perishable goods reach consumers promptly and in optimal condition.

The following feedback has been developed in consultation with AFGC members.

**1. INCREASING HEAVY VEHICLE ROAD ACCESS TO REDUCE EMISSIONS
AND INCREASE PRODUCTIVITY**

Heavy vehicle reform cannot be considered in isolation; it must be integrated with rail investment and planning. A truly efficient freight system requires road and rail to work together to deliver lower costs, faster deliveries, and fewer emissions. Reforming heavy vehicle road access without alignment and accelerated investment in the East–West rail corridor means missed opportunities for efficiency and resilience.

When roads flood or bushfires close highways, rail can keep goods moving, but only if both systems are planned together. A coordinated approach will lower transport costs, reduce food waste by improving delivery speed for perishable goods, and create a more resilient national freight network. It will also provide greater reliability during floods, bushfires, or maintenance disruptions, ensuring essential goods keep moving. In addition, rail offers reduced emissions compared to road freight, supporting Australia's Net Zero 2050 commitments. Finally, integrated planning helps avoid cost volatility and disruption during peak periods.

Key Ask:

Expand access for high-productivity and zero-emission vehicles, harmonise axle mass limits, and invest in critical road infrastructure upgrades. At the same time, accelerate East–West rail corridor improvements with clear timelines and transparency. These reforms must be coordinated so road and rail complement each other, providing alternative pathways during disruptions and introducing competitive options that strengthen Australia's freight resilience and support decarbonisation.



2. NATIONAL AUTOMATED ACCESS SYSTEM (NAAS)

Slow and inconsistent access rules and permit processes cause trucks to sit idle, deliveries to be delayed, and drivers to lose productive hours. When this happens, essential goods—like food, groceries, and household items—take longer to reach shelves. These delays increase costs, add congestion, and raise the risk of stock shortages that directly affect consumers.

Fast-tracking NAAS rollout and creating a single national standard for heavy vehicle access will make compliance easier, improve delivery reliability, and provide better visibility of routes and infrastructure. This means fewer delays, lower costs, and reduced emissions, while improving driver experience and workforce productivity.

Key Ask:

Accelerate the rollout of the National Automated Access System, link it with NHVR Go, and move toward a single national standard for heavy vehicle access. Targeted upgrades on key freight routes and providing improved access data will help operators plan smarter and keep essential goods moving efficiently to consumers.

3. NATIONAL HEAVY VEHICLE DRIVER COMPETENCY FRAMEWORK (NHVDCF)

Australia's freight network relies on skilled drivers to keep goods moving. Currently, driver shortages are among the biggest risks to the freight network; without drivers, freight stops. That means slower deliveries, higher costs, and delays in getting essential items like food and groceries to communities.

Safety is also critical: well-trained drivers reduce the risk of incidents, especially in peak or adverse conditions. Addressing this shortage is essential to keep freight moving, protecting supply chains, and maintaining public confidence.

The National Heavy Vehicle Driver Competency Framework is designed to address these challenges, but poor rollout planning could create bottlenecks, delaying licence progression and shrinking the available driver pool during peak periods. Clear timelines, measurable outcomes, and national consistency are essential to avoid these risks and build a future-ready driver workforce.

Key Ask:

For the NHVDCF to be successful, the rollout must include clear timelines, measurable outcomes, and national consistency—supported by transparent contingency planning that is ready to activate if the rollout faces delays or disruptions. This means having practical solutions prepared, such as temporary licensing arrangements, fast-track pathways for experienced drivers, and funding to expand training capacity if demand spikes. These steps will prevent bottlenecks, improve safety standards, and keep essential goods moving so Australians have reliable access to what they need.

4. BARRIERS TO THE AVAILABILITY OF EV TRUCK CHARGING INFRASTRUCTURE

Transitioning to electric heavy vehicles isn't just about installing chargers, —it requires a coordinated national approach. If planning is left to fragmented local processes, we risk gaps and bottlenecks that slow adoption, disrupt freight flow, and delay essential goods reaching Australians.



Shared charging hubs near major distribution centres and ports, aligned with national freight corridors, are critical to keep freight moving and meet sustainability targets without compromising reliability.

Key Ask:

Integrate EV truck charging infrastructure into a national plan with clear planning and zoning alignment. Co-invest in shared charging hubs near key freight corridors and ports to ensure capacity meets demand and avoid infrastructure bottlenecks that could stall the transition and disrupt supply chains.

5. CURFEWS FOR EV TRUCKS

Allowing EV trucks to operate outside curfew hours could ease congestion, reduce emissions, and improve delivery reliability. But without coordination, these changes risk creating new challenges rather than solving existing ones.

Earlier arrivals only help if delivery windows and site operations can accommodate them. If trucks wait to unload, productivity gains disappear. Community concerns also need attention: quieter vehicles reduce safety cues, and night operations bring light and movement issues. These require clear protocols and engagement.

The most significant risk is driver wellbeing. Night operations add fatigue and safety pressures to an already limited workforce. Ignoring this undermines safety and long-term sustainability. Chain of Responsibility must be reviewed carefully to ensure curfew changes do not introduce negligence or increase accident risk.

Key Ask:

Trial curfew flexibility with caution, only where delivery windows, site operations, and CoR responsibilities are integrated into a national plan. Without this, the reform risks shifting congestion rather than solving it.

The AFGC and its members committed to working with government to deliver reforms that improve network efficiency, strengthen resilience, and build a future-ready workforce. Coordinated action across road, rail, workforce development, and decarbonisation pathways will ensure Australia's FMCG supply chains remain reliable, competitive, and sustainable.

We welcome the opportunity to engage further on these recommendations and collaborate on practical solutions that keep Australia moving.

If you would like to discuss further, please feel free to contact me.

Yours sincerely,

LEE DITTMAR

Manager, Retail Supply Chain
Australian Food and Grocery Council