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Productivity Commission
Level 8
697 Collins Street
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Australia Post Submission – Inquiry into the Impacts of Heavy Vehicle Reform

Australia Post welcomes the opportunity to provide a submission to the Productivity Commission Inquiry into the Impacts of Heavy Vehicle Reform.

The Federal Government has indicated the importance of enhancing national productivity through the Economic Reform Roundtable process, and the concurrent commissioning of several Productivity Commission (the Commission) inquiries. Heavy vehicle reform is vital for boosting national productivity, especially with rising online retail and delivery volumes. Australia Post supports reducing red tape and improving freight and supply chain efficiency.

Australia Post operates one of Australia's largest logistics and delivery businesses, delivering over 2.2 billion items across the country in FY2025. Driven by rising eCommerce volumes, Australia Post saw a 4.3% growth across its parcel business in the same financial year.

Heavy Vehicle Road Access and Productivity

Australia Post supports initiatives and policies that encourage the uptake of low emission vehicles. Future proofing Australia's infrastructure network through a review of access restrictions under the Heavy Vehicle National Law (HVNL) would be a useful reform, ensuring that uptake of zero-emission vehicles is not limited by outdated road access arrangements. The primary obstacle to enhancing national productivity stems from the inconsistent road access regulations across the country, a concern that also affects our operational efficiency. This covers varying requirements for mass limits, route declarations, and in-vehicle technology needed for access. Many local government managed roads and bridges have not been rated for High Productivity Vehicles (HPVs) and other heavier vehicles; and without structural data collected through these assessments, local road managers may deny access to operators or impose restrictions on movement.

Australia Post recommends the Commission consider investigation of the productivity cost of inconsistent access requirements for heavy vehicles traversing several different local government areas.

National Automated Access System (NAAS)

Australia Post supports the ongoing efforts to introduce and implement the National Automated Access System (NAAS).

Currently, permit access applications are managed at the local government level by land managers. Australia Post has, in certain instances, encountered approval delays exceeding two years due to the necessity of seeking access across multiple local government areas—sometimes as many as fifteen. If any single council denies access, network planning must be adjusted, leading to additional delays. Streamlining approvals through a unified access system and a single decision maker would significantly enhance the efficiency and productivity of our network operations.

When implemented, the NAAS will streamline heavy vehicle access by integrating route rules, vehicle credentials and infrastructure data into a single, automated platform that will significantly reduce administrative burden and regulatory inconsistencies, resulting in a significant productivity benefit.

Australia Post notes that this is a complicated reform, with the need for careful integration of state-based permit systems. To prevent process duplication or operator confusion, implementation should be approached holistically, while ensuring that efficiency is maintained and delays are avoided. Whilst noting that the NAAS is still in a ‘proof of concept’ phase of development, the establishment of a clear timeline by the Australian Government and other involved parties would support its timely delivery and in turn ensure associated productivity gains can be realised quickly.

Australia Post recommends that the Productivity Commission encourage the implementation of the NAAS, and investigate the productivity benefits of the reform.

National Heavy Vehicle Driver Competency Framework

The National Heavy Vehicle Driver Competency Framework (NHVDCF) provides a national baseline for the training of heavy vehicle operators, combining online theory, classroom learning, practical assessment and in-cab training. Whilst Australia Post goes beyond training requirement required by regulators when training our own drivers, we are supportive of initiatives to improve the overall quality of national training requirements for heavy vehicle operators and improve the safety on our roads.

In rolling out the NHVDCF, Government must be aware of operators such as Australia Post having training requirements in place that already exceed national requirements and ensure that onerous implementation does not include things like mandatory re-training of all licensed drivers, instead focusing on bringing newly qualified drivers up to a national standard. This would ensure the least disruption,

whilst ensuring that high training standards are maintained. Whilst supportive of the rollout of the NHVDCF, Australia Post further notes that this should be conducted in close collaboration with industry, ensuring that implementation issues or inconsistencies can be resolved.

Australia Post recommends that the Productivity Commission investigate the productivity gains associated with the implementation of the NHVDCF and support its timely implementation.

Barriers to the availability of EV charging infrastructure

The availability of EV charging infrastructure in Australia remains constrained by a range of regulatory, commercial and coordination barriers. These barriers are particularly acute outside metropolitan areas and for fleet and commercial vehicle applications, and risk slowing EV uptake despite growing demand and vehicle availability.

Access to timely and affordable electricity connections remains a major barrier, particularly for fast and ultra-fast chargers. Network augmentation timeframes can extend over several years, which is misaligned with commercial investment horizons and fleet transition plans.

Many charging projects face a “chicken and egg” challenge, where low EV penetration undermines utilisation rates and revenue certainty, while the absence of charging infrastructure suppresses EV adoption. This risk is heightened in regional and remote areas, and for heavy duty and commercial vehicles that require higher capacity charging and longer dwell times. Without targeted policy support, market forces alone are unlikely to deliver adequate coverage in these locations.

Policy and infrastructure planning has largely focused on passenger vehicles, with insufficient attention to the distinct needs of commercial and fleet users. Depot-based charging, high utilisation vehicles, and time-critical operations require different infrastructure solutions.

Addressing these barriers will require coordinated action across all levels of government.

Government investment and installation of charging infrastructure should complement on site and on-base charging systems, prioritising installation in areas frequented by vehicles stopping for periods of time, such as highway truck-stops and driver rest areas.

Action is needed at a local and state government level as well, ensuring that planning regimes are directed or incentivised to plan for new EV charging infrastructure, ensuring new builds are fit-for-purpose and can accommodate the size and scale of large line-haul vehicles.

Australia Post recommends the Productivity Commission investigate the benefits of coordinated government investment in strategically located EV charging infrastructure.

Curfews for EV trucks

Inconsistent truck curfews create a significant and under-recognised barrier to efficient freight and logistics operations. These curfews often vary by location, time of day, vehicle class and road type, resulting in a fragmented regulatory environment that increases costs, reduces productivity and undermines broader transport and economic objectives.

Inconsistent curfew arrangements limit the ability of freight operators to plan efficient routes and schedules. Vehicles are often forced to detour, idle or operate within narrow time windows, increasing travel distances, congestion and operating costs. These inefficiencies disproportionately affect time-sensitive deliveries and high-frequency services, including postal, parcel and essential supply chains. By limiting freight movements to limited operating hours, curfews can also unintentionally concentrate truck traffic into peak periods. This increases congestion on already constrained road networks and heightens interactions between heavy vehicles, passenger vehicles and vulnerable road users.

Curfew policies are often implemented at a local level with limited coordination across jurisdictions. This results in similar roads and freight tasks being subject to different restrictions, creating confusion for operators and undermining confidence in the regulatory framework. In many cases, curfews are not regularly reviewed to reflect changes in vehicle technology, noise performance or safety standards.

The cumulative impact of inconsistent curfews reduces freight productivity and increases the cost of moving goods across the economy. These costs are ultimately borne by businesses and consumers and disproportionately affect sectors reliant on efficient, low-margin logistics. For national and state-based operators, like Australia Post, inconsistent curfews also complicate compliance and increase administrative burden.

A more consistent, coordinated and evidence-based approach to truck curfews is required to support efficient freight movement while balancing community amenity. This should include greater alignment across jurisdictions, regular review of curfew settings, and consideration of modern vehicle standards and off-peak operating opportunities.

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