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INTRODUCTION

Team Global Express (TGE) appreciates the opportunity provided by the Productivity Commission to provide feedback on the *Impacts of Heavy Vehicle Reform - Interim Report* and provides the following submission.

EXECUTIVE SUMMARY

TGE welcomes the Productivity Commission's Interim Report and strongly supports the reform directions outlined across access, automated permitting, driver competency, curfews and HZEV charging infrastructure.

As one of Australia's largest multimodal transport and logistics operators, TGE sees daily the operational constraints that limit productivity, increase costs for households, and slow the transition to a safer, cleaner freight system.

The Commission's interim findings confirm what industry has long observed: the greatest productivity uplift will come from ambitious access reform and a National Automated Access System (NAAS) capable of delivering fast, consistent, asset-aware decisions.

TGE agrees with this assessment and encourages the Commission to adopt a more ambitious, implementation-focused stance in its final recommendations.

Across all reform areas, TGE's position is clear:

- Access reforms should be ambitious, corridor-based and nationally consistent, with uplift scenarios modelled at +5% and +10% to reflect real-world fleet needs.
- A NAAS must be governed, standardised and performance-managed, not simply deployed.
- Any HZEV charging reform must address grid, tariff and revenue-risk barriers, and focus not only planning definitions.
- Curfew reform should be linked to staging capacity and structured pilots, enabling safe night-time HZEV operations.
- Driver competency reform must be accelerated, with a pilot-led national rollout completed within 18 months.

TGE also highlights a critical omission in the Interim Report: that being Low Carbon Liquid Fuels (LCLFs). Renewable diesel offers the fastest, lowest-cost emissions reduction pathway for the existing fleet, without payload penalties or infrastructure upgrades. LCLFs should be recognised as a complementary decarbonisation lever alongside HZEVs as LCLFs are likely to be necessary for some decades in the future.

TGE's operational data demonstrates that access constraints, inconsistent local government decision-making, and outdated planning and curfew rules materially impede the efficient

operation of heavy vehicles and significantly constrain the commercial viability of HZEVs. These constraints reduce fleet utilisation, increase operating costs, and undermine the reliability of national supply chains. The Commission's recognition of these issues is timely and well-founded.

TGE supports the Commission's reform direction but submits that several recommendations should be strengthened, particularly in relation to the speed and scope of access reform, the harmonisation of ZEV mass concessions, and the acceleration of NAAS implementation.

TGE also submits that curfew reform is essential to unlocking the full productivity and environmental benefits of HZEVs, and that national driver competency reforms should be implemented earlier than 2028 to address workforce shortages and improve safety outcomes.

TGE agrees with the Interim Report that accurately identifies the principal regulatory and administrative barriers to productivity, safety and decarbonisation within the heavy vehicle sector. These include:

- a) inconsistent and inflexible access arrangements;
- b) reliance on permit-based approvals;
- c) fragmented local government decision-making;
- d) outdated planning and curfew frameworks; and
- e) the absence of nationally consistent mass concessions for HZEVs.

TGE further suggests that the Commission's proposed reforms, if implemented in a timely and coordinated manner, would materially improve the efficiency, safety and environmental performance of Australia's freight networks.

TGE stands ready to support the Commission's final recommendations.

1. CONTEXT FOR HEAVY VEHICLE REFORM

Information Request 1.1

TGE believes that the proposed reforms will have significant and positive impacts across multiple workforce cohorts and consumer groups.

TGE employs an extremely diverse workforce, with a wide variety of cohorts, including by age, gender, country of birth, income and education.

Reforms that reduce administrative burden, improve access certainty, and support the deployment of modern vehicles (including HZEVs) will enhance safety, reduce physical strain, and improve job attractiveness across all of these cohorts. These reforms will also support greater workforce participation, particularly among groups historically under-represented in the heavy vehicle sector.

Consumers will benefit from improved delivery reliability, reduced congestion, and lower freight costs. These benefits, while diffuse and difficult to quantify, are nonetheless significant and consistent with TGE's earlier submission, which emphasised the consumer welfare implications of access reform and fleet modernisation.

2. ACCESS FOR HIGH PRODUCTIVITY AND HEAVY ZERO-EMISSIONS VEHICLES

Information Request 2.1

TGE supports the proposed uplift of General Mass Limits (GML) to Concessional Mass Limits (CML), and the proposed increases in general length and height limits.

These reforms will provide an immediate productivity uplift and will materially improve the commercial viability of HZEVs, which often require additional mass and dimensional allowances due to battery weight and associated equipment.

TGE notes that some legacy infrastructure, including older loading docks and certain local bridges, may require assessment or modification to accommodate the proposed dimensional increases.

These issues are manageable and should not impede the implementation of the reforms.

TGE's earlier submission recommended a more ambitious mass uplift. While the Commission's proposal is a positive step, it remains conservative relative to international benchmarks.

Draft Finding 2.1 – Access reforms can unlock the benefits of a modern fleet

TGE agrees with this finding. Access constraints remain the most significant impediment to productivity across TGE's national network.

Fleet kilometres are regularly operated below optimal mass or dimension limits due to inconsistent access rules and reliance on permit-based approvals. PBS vehicles frequently operate below their engineered capability because of fragmented access arrangements.

The Commission's recognition of the misalignment between the beneficiaries of access and the entities responsible for infrastructure costs is also consistent with TGE's earlier submission.

Draft Recommendation 2.1 – Allow greater as-of-right access and simpler PBS approvals

TGE supports this recommendation. The current PBS approval process is unnecessarily complex and duplicative.

Allowing eligible PBS vehicles to be added to existing gazetted notices without requiring new notices or individual approvals would significantly reduce administrative burden and improve fleet utilisation.

TGE suggests that this recommendation should be strengthened by requiring states and territories to publish asset capability maps by 2027 and by adopting a “default access unless proven otherwise” rule for PBS Level 1 and 2 vehicles.

Information Request 2.2 – Improving the PBS Scheme

TGE recommends that the PBS scheme can be improved through the development of a national PBS Template Library, which would provide pre-approved designs for common vehicle combinations.

The PBS Review Panel should continue to assess novel or high-risk designs but should not be required to review every application.

Criteria for adding PBS vehicles to existing notices should focus on safety and infrastructure performance. Telematics-based monitoring should be used to ensure ongoing compliance.

Draft Recommendation 2.2 – Nationally consistent concessional mass limit for HZEVs

TGE supports the establishment of a nationally consistent concessional mass limit for HZEVs.

Battery weight remains a significant barrier to ZEV uptake, and a mass concession is essential to ensure payload parity with diesel vehicles. TGE recommends that a five-year review cycle would provide greater investment certainty than the proposed three-year cycle.

Information Request 2.3 – Implementing a mass concession for HZEVs

TGE recommends a concessional mass limit of approximately 2.5 tonnes for rigid HZEVs and 1 tonne per trailer for HZEV combinations.

These figures reflect the typical weight differential between diesel and electric vehicles in TGE's fleet trials.

The concession should apply automatically to PBS vehicles that meet defined templates.

TGE's experience indicates that battery weight reduces payload by up to 20 per cent, significantly affecting commercial viability. At current adoption rates, the road wear impacts of such a concession would be minimal.

3. ACCELERATING A NATIONAL AUTOMATED ACCESS SYSTEM

Draft Finding 3.1 – The existing permit system is ripe for reform

TGE agrees with this finding. The current permit system is inefficient, costly and inconsistent.

TGE processes thousands of permits annually, many of which relate to identical routes or vehicle configurations.

Delays of 24 to 72 hours are common, reducing fleet utilisation and undermining supply chain reliability.

Draft Recommendation 3.1 – NAAS should incorporate network-based access

TGE supports the development of a network-based NAAS. A system that provides access at the network level will significantly reduce administrative burden and improve operational flexibility.

Network-based access also enables dynamic rerouting in response to congestion, incidents or infrastructure works.

Information Request 3.1 – Improving local government decision-making

TGE submits that improved guidance and asset data are necessary but not sufficient in this instance.

Broader reforms are required to ensure consistent and timely decision-making by local governments.

These reforms should include mandatory publication of asset capability data, standardised decision-making criteria, and funding to build engineering capability within local governments.

Information Request 3.2 – Factors affecting NAAS implementation

TGE suggests that the primary constraints affecting NAAS implementation include the lack of digitised bridge and pavement data, shortages of specialist engineers, and inconsistent IT capability across local governments.

Federal funding should be directed towards asset data digitisation, training programs for local government staff, and the development of a single national access decision engine.

Draft Recommendation 3.2 – Funding for SLGAAP Phase 4

TGE supports the continued funding for the Strategic Local Government Asset Assessment Project (SLGAAP). SLGAAP is essential to building the asset data required for automated access decisions and reducing the burden on local governments.

4. ADMINISTRATIVE AND REGULATORY BARRIERS TO CHARGING INFRASTRUCTURE

Draft Recommendation 4.1 – Improve the EV Charging Infrastructure Mapping Tool

TGE supports the proposed enhancements to the EV Charging Infrastructure Mapping Tool. More granular network capacity data, combined with freight movement information and land-use permissions, will significantly improve the tool's usefulness for planning HZEV charging infrastructure.

Draft Recommendation 4.2 – Adapt land use regulation to HZEV charging

TGE supports the proposed reforms to land-use regulation.

However, TGE emphasises that it did not experience significant delays in obtaining planning approvals for Project Cobra in Bungarribee – our depot-based charging infrastructure site - due to outdated land-use definitions or inconsistent interpretations by local governments. Our planning permission process and costs were reasonable and so we would not recommend any changes per se to this process.

In other instances, it may be that exempting charging infrastructure from planning permission where it is consistent with existing land use would significantly reduce administrative burden and accelerate ZEV deployment.

Information Request 4.1 – Impact of DR 4.1 and 4.2

TGE notes again that the planning approvals process for its site at Bungarribee were streamlined and reasonable, and the costs were less than \$50,000.

TGE estimates that the proposed reforms would normally have the potential to reduce approval times by 50 to 70 per cent and reduce project costs by between \$150,000 and \$400,000 per depot.

Information Request 4.2 – Facilitating private investment at rest areas

TGE recommends that governments should provide long-term leases for rest area sites, standardise connection processes with distribution network service providers (DNSPs), and enable co-investment models with freight operators.

5. HEAVY VEHICLE CURFEWS

Information Request 5.1 – Prevalence of curfews

TGE suggests that curfews are most widespread in Victoria, moderate in New South Wales, and less systematic in other jurisdictions.

These restrictions typically prohibit deliveries between 10 pm and 6 am and are primarily motivated by noise concerns for local residents, even if the area is in a designated industrial zone.

Draft Finding 5.1 – Strong case for reducing curfew burdens on HZEVs

TGE agrees with this finding. ZEVs are significantly quieter than diesel vehicles, particularly during low-speed manoeuvring and acceleration.

TGE's trials indicate that ZEV night deliveries can reduce congestion impacts and improve delivery efficiency.

Information Request 5.2 – Costs and benefits of curfew reform

TGE recommends a vehicle-based exemption for ZEVs, enforced through VIN-based classification and telematics. A performance-based approach, using noise thresholds, could also be adopted.

The benefits of curfew reform include improved delivery efficiency, reduced congestion, and enhanced supply chain resilience.

6. NATIONAL HEAVY VEHICLE DRIVER COMPETENCY FRAMEWORK

Draft Finding 6.1 – Reforms are progressing

TGE supports the proposed reforms to the National Heavy Vehicle Driver Competency Framework. National consistency is essential to improving driver mobility and safety.

Information Request 6.1 – Costs and benefits

TGE recommends that the costs of implementing the reforms will include training and assessment upgrades, IT system updates, and instructor accreditation.

The benefits include reduced incident rates, improved driver confidence, and enhanced workforce retention.

Information Request 6.2 – Future reform directions

TGE supports weight concessions for ZEVs to ensure payload parity with diesel vehicles. TGE also supports structured recognition of overseas licences, provided that appropriate safety assessments and training are in place.

7. CONCLUSION

TGE supports the Commission's reform direction and encourages the adoption of more ambitious timelines for access reform, NAAS implementation, and ZEV mass and planning harmonisation.

Curfew reform is essential to unlocking the full productivity and environmental benefits of ZEVs, while investment in driver competency reforms will support a safer and more capable workforce.

TGE stands ready to provide data and expertise to support the Commission's final recommendations.