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Commissioner Martin Stokie and Commissioner Barry Sterland

Email: ncp@pc.gov.au

From: The Crane Industry Council of Australia (CICA)

Dear Commissioners, Stokie and Sterland

Submission on Impacts of Heavy Vehicle Reform: Interim Report

Thank you for making the Interim Report available and for providing the opportunity to contribute further information to the Productivity Commission's inquiry into the impacts of heavy vehicle reform.

The Crane Industry Council of Australia (CICA) has taken the opportunity to consult with our members in preparing this response. Through that process, we have gathered practical insights and industry experience that we believe will be useful to the Commission's consideration of the issues raised in the Interim Report.

CICA welcomes the opportunity to contribute to the additional information requested below.

2.1 The PC is seeking feedback on how proposed reforms to the Heavy Vehicle (Mass, Dimension and Loading) National Regulation (expected to commence on 1 July 2026) will affect access.

These reforms include uplifting General Mass Limits to Concessional Mass Limits, increasing general length limits from 19 m to 20 m and increasing general height limits from 4.3 m to 4.6 m.

What implications would these reforms have for high productivity and heavy zero emissions vehicles?

For crane businesses, length often determines whether a crane can travel as a complete, workable unit. If the vehicle combination is too short, operators may need to remove components, use a different trailer configuration, or make multiple trips, all of which add cost, delay and increased emissions. Longer general-access limits can improve productivity even when no extra mass is added.

A length increase can help with carrying longer booms, counterweights, dollies, and other crane transport hardware in a safer and more efficient arrangement. It can also improve load distribution



and vehicle configuration options, which matters in crane transport. In practice, that means better access, fewer reconfigurations, and less downtime between jobs.

2.3 The PC is seeking feedback on implementation of a nationally consistent mass concession for electric heavy zero emissions vehicles (HZEVs).

The crane industry supports a concessional mass dispensation for hybrid vehicles. The additional mass is tied directly to environmental technology, as hybrid cranes deliver lower fuel use, reduced emissions (CO₂, NO_x, particulates), and less noise, while maintaining operational capability.

From a road use perspective, the concession can also improve efficiency by reducing reliance on permits, cutting administrative burden, and enabling the same work to be done with fewer movements or less disruption.

A slightly heavier vehicle in exchange for a cleaner, more efficient piece of equipment, would encourage uptake of the technology by industry.

How should a concessional mass limit be implemented?

The concessional mass should be applied in a simple, nationally consistent way that recognises the additional weight of hybrid or electric systems without pushing operators back into permit pathways. It should sit within (Gazette notices and approved networks for cranes) where possible, provided axle spacing, tyre sizing and network limits are still met. The key is to avoid creating another layer of approvals otherwise the benefit is lost.

What should the size of the concessional mass limit be?

A concession in the order of **2.5 tonnes, particularly on the 50-tonne and 55-tonne networks in NSW** is reasonable. This reflects the additional weight of hybrid drivetrains, batteries, and associated systems, without providing any meaningful increase in payload. The intent is to offset the weight of environmental technology and incentivise this technology in industry.

Are additional changes or approvals required?

No additional approvals should be required beyond standard compliance with axle spacing, tyre sizes, bridge limits, and route suitability. If extra approvals are introduced, it undermines the purpose of the concession and discourages uptake.



Is a three-yearly review appropriate? What benchmarks should be considered?

A three-year review is reasonable. It should look at:

- Uptake of hybrid/electric heavy vehicles
- Measurable reductions in fuel use, emissions, and noise
- Any identified road wear or infrastructure impacts
- Operational outcomes (e.g. reduced trips, improved efficiency)

What are the expected impacts of applying the mass concession?

The expected outcome is a net public benefit. While vehicles may be slightly heavier, they are also cleaner, quieter, and often more efficient in how work is carried out. In crane operations, this can mean fewer support vehicles, less idling, and reduced overall time on the road network.

To what extent would this accelerate uptake?

A practical, usable concession would materially improve uptake. If operators can adopt hybrid cranes without losing operational capability or getting caught in permit systems, they are far more likely to invest in the technology.

What road wear impacts will this have?

Any increase in road wear is expected to be marginal if axle loads, tyre size and route limits are respected. Importantly, this needs to be weighed against the broader overall picture of increased uptake, and broader operational picture of fewer trips, reduced idle time, and more efficient movements can offset some of the additional mass.

3.1 The PC is seeking evidence and views about how the National Automated Access System can be designed to improve the consistency and quality of local governments' access decisions. Is guidance and improved road asset data adequate, or are broader reforms needed to optimise decision making by local governments?

3.2 What are the factors affecting implementation of the National Automated Access System?



Consistency across states

The crane industry continues to face real constraints from inconsistent state-by-state approaches. For operators working across borders, multiple access rules and approval pathways add cost, delay projects, create frustration and introduce unnecessary risk. The industry needs a single, nationally consistent system that provides clarity and certainty.

CICA strongly supports the intent of NAAS, to reduce duplication and streamline access but its effectiveness will ultimately depend on how consistently it is applied. With the rollout still staged and reliant on each jurisdiction aligning its own rules and processes, there is a very real risk that the benefits will be diluted if states continue to treat similar crane movements differently.

Without stronger alignment, NAAS risks becoming another layer of complexity rather than the solution it was designed to be.

All crane types need to be included

The feedback CICA has received from the crane industry has been that NAAS needs to reflect the full reality of crane operations. That means covering the full range of practical movements, including cranes operating both with and without dollies. If coverage is limited, operators will continue to be pushed into permit-heavy edge cases, facing the same inconsistencies NAAS is intended to remove.

A partial system won't solve the problem, as movements that fall outside the framework are often the very ones that matter most for day-to-day planning and delivery. Leaving those gaps undermines efficiency, increases administrative burden, and erodes confidence in the system.

The value of NAAS will be determined by how comprehensively it applies across crane operations, not by how well it caters to a narrow subset of configurations.

Local government involvement

Local government plays a critical role in making NAAS work in practice, as councils are often the road managers responsible for or directly informing access decisions.

The legitimate concern from industry, based on lived experience, is if councils aren't properly brought into the process, there's a real risk the system won't reflect on-the-ground realities, like local road constraints, asset limitations, or the practical conditions operators deal with.



There is also a broader issue around consistency. Access decisions shouldn't come down to an individual road manager's appetite for risk, decisions should be made on clear guidance, and robust, reliable road asset data. Then, it's not enough for that data to simply exist, it needs to be properly assessed, understood, and applied in a consistent way to support sound decision-making. This is going to require a rapid increase in local government involvement, education and the appropriate support structures.

Local data collection

Local road managers need good, reliable information to work with, consistent data definitions, and a clear baseline of what applicants are expected to provide so decisions can be made properly and defensibly.

NAAS also acknowledges that different road managers will use different assessment methods, which is a much harder problem to solve than just improving datasets, because it underpins how decisions are made and how risk is interpreted.

Without stronger alignment in both the information being provided and the way it's used, there's a real risk that variation will continue and with it, the very inconsistency NAAS is trying to fix.

3.2.2 What are the main resource constraints (for example, skilled people, data and information or equipment), and what parts of the implementation do they affect?

Implementation of the NAAS depends on local asset data capture, jurisdictional coordination, and the capacity of road managers to use automated tools; and inconsistent local structures, limited expertise, and reliance on operator responsibility can all weaken decision quality.

The main resource constraints are:

Data on local government structures

NAAS is being built around road-manager decisions and network mapping, so inaccurate or incomplete council structure data disrupts the approval workflow and the road manager interface.

Resources/expertise within local government

Whether councils can interpret asset data, set risk appetites, maintain network information, and use automated tools confidently is currently in question, and varies greatly from council to council.



Feedback from members is that current capacity is a limiting factor, for example, how many people within council have bridge engineering expertise?

Resource availability

The pace of asset-data collection, the quality of assessments, and whether councils can keep data current as roads change will determine not only the preparatory phase but also the ongoing implementation of the NAAS which is data-intensive and resource dependent.

Level of sophistication

NAAS is intended to “pre-load” decision-making by matching vehicles to road and asset capacity, this requires more advanced technical and governance capability than basic guidance alone.

Reliance on operator responsibility

CICA notes that the current road access system places a heavy reliance on applicants providing complete and accurate information upfront. In practice, that means the quality of the outcome often depends on how well an operator can interpret and present technical requirements, rather than on a consistent, system-led assessment of the network itself.

That approach creates variability, because different levels of understanding, experience, and resourcing across applicants can lead to different standards of submissions, which then flow through to different decisions, even for similar movements. It also places a significant burden back onto industry to essentially “get it right” before the system can function properly.

A more effective model would see the system itself carry more of the responsibility for validation and assessment, supported by clear standards and robust road asset data. Applicants should provide operational detail, but the consistency of decision-making shouldn’t hinge on their ability to navigate complex requirements correctly every time.

How these constraints show up in practice

Local government capability and consistency continue to be one of the more frustrating pressure points for the crane industry. Our members are dealing with very different approaches depending on which council they are working with, and that variability has a real cost.



The difference is stark, for example, one council in Western Sydney, in the middle of significant development activity has contributed to delays that have added thousands of dollars in avoidable cost to a project, simply through slow, inconsistent or no access decisions. The outcome hasn't been better safety or better outcomes, just delay and uncertainty being carried through to the job site.

By contrast, there are councils in Queensland currently taking a far more practical, solution-focused approach. In those areas, local government has worked with industry, engaged early, and focused on enabling works to proceed safely and efficiently. The result is infrastructure is currently being delivered with far fewer of the delays, frustrations, and budget blowouts seen elsewhere.

CICA members are willing and keen to engage directly with the Productivity Commission, to provide evidence in a face-to-face setting to help illustrate how significant the variation between councils really is in practice, and what it means for project delivery on the ground.

Through these examples and the day to day lived experience of trying to get things built in Australia, it is clear that broader reform is needed because local governments face structural issues such as unknown infrastructure capacity, balancing access against asset preservation, and the burden of making risk-based decisions without strong tools.

Earlier governance work also identified weak incentives for maintaining roads used by heavy vehicles, underdeveloped pricing mechanisms, and the need for more rigorous asset-condition assessment. So, if the goal is better decision-making, the reform agenda needs to include governance, decision rules, and funding/incentive settings, not just better information.

3.2.3 What would be the best way to accelerate rollout of the National Automated Access System?

The biggest factor in accelerating the rollout of the National Automated Access System is making sure it is properly resourced from the outset. Without adequate funding and dedicated capability, even the best-designed system will stall, and the end product will not deliver what has been promised.

There also needs to be genuine, ongoing industry consultation, at the design level, and as the system is built and rolled out in real conditions. That feedback loop is critical to making sure NAAS reflects how access actually works on the ground, not just in policy.

Local government involvement is another key lever, as mentioned earlier, councils are central to road access decisions, so a faster rollout depends on bringing them into the process early and at scale,



which includes supporting them with the right tools, guidance, and training to apply the system consistently.

Larger, multi-disciplinary teams are also needed, not just policy and technical staff, but people who understand operations, asset management, and the practical realities of heavy vehicle movements. That breadth of experience is what allows a system like this to move from design into effective delivery.

Finally, both industry and local government need proper support structures as the system transitions. Adequate resourcing, proper expertise, clear guidance, responsive help functions, and consistent national messaging are all needed to build confidence and ensuring the NAAS is adopted in a way that actually improves access outcomes.

3.2.4 If more funding is needed, where should it be directed and what should it be spent on?

CICA believes that considerable additional funding is required to support the rollout of NAAS, and that it needs to be directed in a way that simultaneously builds national consistency and practical capability on the ground, not just toward system development in isolation.

A significant expansion of the SLGAAP program should be a priority as SLGAAP already plays an important role in supporting safer and more efficient heavy vehicle access on local road networks and scaling it up would directly strengthen the interface between NAAS and local government decision-making. It is one of the most practical mechanisms available to improve consistency at the local road level.

Additional funding should be directed to state road agencies to build and maintain dedicated expert teams. These teams are essential to support complex assessments and provide technical guidance.

Finally, a portion of funding needs to focus on understanding and addressing capability and data gaps within local government. Many councils are being asked to play a central role in access decisions, but the reality is that resourcing, systems, and data quality vary significantly. Investment here needs to include capability uplift, training, and practical tools to ensure that data is not just available but properly interpreted and used in decision-making.



5.1 The PC is seeking information on the prevalence of curfews. How widespread are local government restrictions through local planning rules? What are the typical terms of these restrictions? If they exist, what are the typical reasons (noise or other reasons)?

Curfews for crane transport vary by state because they are set by road managers and local authorities to manage peak-hour traffic risks, with cranes typically classified as Restricted Access Vehicles (RAVs) or Class 1 oversize/overmass loads. Most states impose standard daytime restrictions (e.g., no travel during peak hours), holiday curfews (e.g., Easter and Christmas), and night bans unless permitted, but the exact times, exemptions, and enforcement differ. As demonstrated by the table below:



State/Territory	Standard/Regular Curfews	Holiday Curfews	Additional Crane restrictions
New South Wales (NSW)	Peak hours in metro areas (e.g., 7-9am, 4-7pm); night travel often restricted	State-wide ban from 8:30am first holiday day to 11:59pm last day; limited services 22-24 Dec	Cranes have different travel time restrictions for different zones in NSW. There are zones with curfews from 6:00-10:00am and 3:00-7:00pm. And there are zones with curfews from 7:00-9:00am and 4:00-6:00pm.
Victoria (VIC)	Metro curfews for oversized; night restrictions common	Limited services on holidays; separate metro curfews	Route-specific maps; crane operating condition within the permit.
Queensland (QLD)	Daytime bans for oversize; night permits required	No travel 12:01am Thu 2 Apr to 11:59pm Tue 7 Apr (exemptions for SPVs, some cranes)	Curfew conditions vary between different QLD Councils.
South Australia (SA)	Peak-hour and holiday bans	Partial shutdowns over holidays	Travel within the Adelaide metropolitan area is prohibited between the hours of 7am to 9am and 4pm to 6pm Monday to Friday inclusive.
Western Australia (WA)	Oversize RAV curfews; 200m following distance	Easter curfews per permit conditions	Not under NHVR; Main Roads sets crane-specific rules, night bans common.



Tasmania (TAS)	Escort-dependent; night/peak restrictions	No escort services Fri 3 Apr to Tue 7 Apr; emergency only	Full shutdown for permit escorts during holidays.
Northern Territory (NT)	Similar to WA; local rules	Varies; align with holiday advisories	Not NHVR; crane moves often need permits with time limits.

Table 1: State Variations: Curfew Requirements

Harmonising curfews, just like pilot/escort requirements for crane operations across Australian states would create a single national standard, cutting compliance costs and delays for interstate crane businesses. Inconsistent rules create unnecessary red tape, risk safety through confusion, and reduce productivity in an industry that often moves equipment between states.

Currently, curfews and escort rules differ significantly, and these patchwork rules mean operators must navigate multiple permit systems, route maps, and time windows per state.

A national standard would simplify compliance for crane operators moving across borders, would boost safety by reducing errors from state-specific knowledge gaps, cut administrative costs (e.g., fewer consents), and improve access to key networks, delivering productivity gains for the entire crane industry.

Conclusion

The crane industry is seeking genuine reform, proper, ongoing consultation and is willing to work with regulators to get these settings right.

For some time now, the cumulative impact of current arrangements is having real world detrimental impacts. A combination of access constraints with rising fuel costs, growing compliance obligations, and increasing administrative burden, makes it harder for businesses to stay productive and viable, not just in crane operations, but across a range of sectors that rely on heavy vehicle access.



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Lifting Industry Standards

There is a real opportunity here to reset the approach, with genuine collaboration between industry and regulators, these systems can be improved in a way that supports safety without unintentionally slowing down the very productivity the economy depends on.

CICA welcomes further engagement with the Productivity Commission and Government to progress these reforms.