



# Productivity Commission: Impacts of Heavy Vehicle Reform

## Submission by Electric Vehicle Council

### Introduction

The Electric Vehicle Council (EVC) welcomes the opportunity to respond to the Productivity Commission's interim report into the impacts of heavy vehicle reform. We congratulate the Commission on its depth of industry engagement and its focus on some of the most longstanding obstacles to the uptake of heavy electric vehicles (EVs).

The EVC is the national peak body for the electric vehicle (EV) industry in Australia. Our mission is to accelerate the electrification of transport for a sustainable and prosperous future. We represent more than 70 businesses across the EV value chain, including car, bus and truck manufacturers, importers, operators, charging infrastructure suppliers financiers and energy networks.

As the voice of Australia's EV industry, the EVC has brought together a coalition of leading industry voices to advocate for substantive reform. The [open letter](#) has now been signed by more than 35 Australian business leaders, clearly identifying priority areas where the industry is united and focused on supply chain efficiency, cost reductions and national productivity. The EVC welcomes the PC's own focus on many of these areas, including:

- Draft finding 2.1: Access reforms can unlock the benefits of a modern fleet
- Draft recommendation 2.2: A nationally consistent concessional mass limit for electric heavy zero emissions vehicles (HZEVs)
- Draft recommendation 3.1: The National Automated Access System should incorporate network-based access
- Draft recommendation 4.1: Make the Electric Vehicle Charging Infrastructure Mapping Tool more relevant to heavy zero emissions vehicle (HZEV) charging
- Draft recommendation 4.2: Adapt land use regulation to heavy zero emissions vehicle charging infrastructure
- Draft finding 5.1: There is a strong case for reducing curfew burdens on heavy zero emissions vehicles

The EVC has focused our latest comments on the Commission's specific 'Information Requests' relevant to the above.

Should you wish to discuss this submission, further kindly contact Cameron Rimington, Senior Policy Officer – Heavy Vehicles

Kind regards,

**Aman Gaur**  
Head of Policy, Advocacy & Legal

**Information request 1.1:** The PC is seeking evidence and views about how the package of heavy vehicle reforms examined in this study may impact consumers, including in ways that may be difficult to quantify, such as improved quality of service or wellbeing, or greater choice.

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While difficult to quantify, transitioning to cleaner, electric commercial vehicles offers whole-of-society benefits, including (but not limited to):

- Lower noxious emissions and improved air quality
- Associated health benefits – heavy vehicle exhaust is responsible for approximately \$6.2b in societal health costs and up to 2,000 avoidable deaths each year
- Less noise pollution and improved amenity, particularly for low-income communities living near freight precincts
- Improved road safety, because of newer vehicles with the latest safety features
- Reduced carbon emissions and the consequences of climate change.

In particular, the current fuel crisis is reinforcing the close link between heavy vehicle disruption and consumer impacts. Rising heavy vehicle operating costs are placing significant pressure on Australia's supply chains, with direct consequences for everyday consumers. Diesel prices have surged dramatically, with fuel now accounting for up to 60% of trucking operating costs (nearly double pre-crisis levels) and the cost of trucking has risen approximately 9.2% overall. These costs do not stay within the industry; they flow directly to consumers through higher prices on essential goods, with retailers already reporting increases on staples such as fruit, vegetables, milk and bread.

By facilitating the uptake of heavy EVs, the PC's proposed reforms will improve the efficiency and resilience of Australia's supply chains, tempering the impact on consumers in crises to come.

**Information request 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.

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

While the proposed reforms to General Mass Limits are a welcome step toward simplifying heavy vehicle access, they will have little practical impact on the uptake of Heavy Zero Emission Vehicles (HZEVs). The changes do not address the core regulatory barriers holding back HZEV adoption:

- front and rear axle mass limits remain unchanged
- the *relative* payload penalty that places HZEVs at a disadvantage compared to their diesel equivalents

In short, diesel vehicles will still be permitted to carry greater payloads than HZEVs under the regulatory changes, just at the new higher limits. Only a targeted mass concession specific to HZEVs will meaningfully close this gap.

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

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*How should a concessional mass limit to overcome the current payload gap between comparable diesel and electric HZEVs be implemented?*

Best practice would be to establish as-of-right access for HZEVs under the Heavy Vehicle National Law.

The recommended path forward is to reclassify heavy electric vehicles as General Access Vehicles under the Heavy Vehicle National Law, giving them as-of-right access to Australia's road network — reversing the current onus of justification placed on operators. Similar carve outs would be needed in non-HVNL jurisdictions (i.e. Western Australia and the Northern Territory).

A generalised mass concession for the vehicles themselves would be a welcome initiative (see below), but true productivity benefits will only come from *specific* concessions on front-axle weights (8-8.5 tonnes recommended) and rear axle limits (18.5-19 tonnes recommended).

*What should the size of the concessional mass limit be?*

Australia should adopt a concessional mass limit for HZEVs that reflects international best practice and addresses the real-world weight penalties associated with battery electric drivetrains. Australia's current front axle limit of 7.0 tonnes — even under the Euro VI concession — is insufficient to allow HZEVs to legally operate at the same payloads as equivalent diesel vehicles, given that zero emission drivetrains add at least 1 tonne, and in some cases up to 2 tonnes, to a vehicle's tare weight.

Ideally, Australia should look to the European Union's more generous 4-tonne GCM concession as a benchmark, given the broader whole-of-economy benefits HZEVs deliver across productivity, health, fuel efficiency, and carbon reduction. At a minimum, this should include an additional 2 tonnes of Gross Combination Mass (GCM), consistent with the UK's approach, with:

- a front axle mass limit of up to 8.5 tonnes
- a rear axle mass limit of up to 19 tonnes.

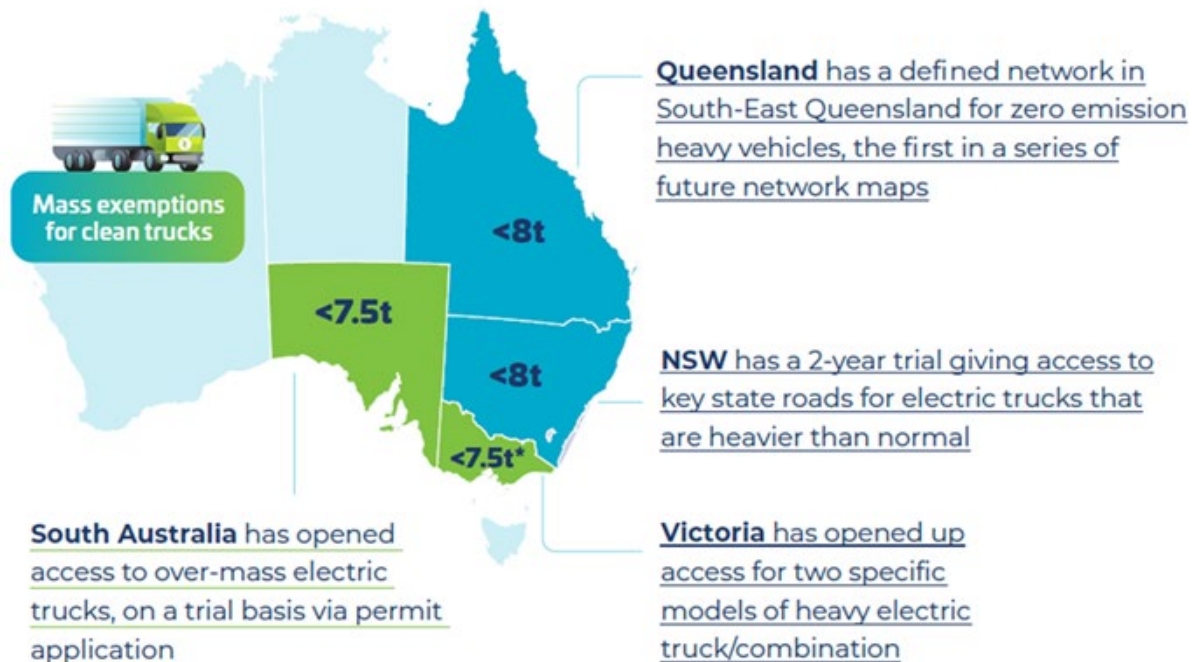
The European Union already permits up to 10 tonnes on the front axle and is actively reviewing further increases. Without equivalent reform, Australian operators face an unavoidable payload penalty that undermines the commercial viability of transitioning to zero emission fleets.

*What are the outcomes and learnings that have come out of the trial-based concessional electric HZEVs mass limit arrangements?*

Easily the clearest learning from the current trial-based approach is that bespoke route-by-route arrangements are not capable of scaling uptake of HZEVs and that anything short of as-of-right access will continue to undermine national productivity.

Heavy electric vehicles in Australia currently face a fragmented and unworkable patchwork of access rules spanning national, state, territory, and local government authorities. The situation is compounded by inconsistent state-based responses to the

problem. Rather than creating a unified national market, this approach has fragmented it, erecting invisible borders in an industry that, by its very nature, does not operate within them. Current trials have only emphasised the need for a nationally consistent concession for HZEVs.



Another learning is that the temporary and trial-based nature of many existing concessions fundamentally undermines operator confidence. Fleet vehicles (including rigid truck bodies for battery electric trucks) are purpose-built to match legislated mass limits, meaning short-term or pilot concessions create long-term uncertainty for operators making significant capital investment decisions. Businesses cannot confidently commit to electric fleets when the regulatory environment governing their operation may change or expire.

*How should the mass concession interact with the Performance-Based Standard scheme, including new and/or existing permits? What are the merits and downsides of the different options?*

The PBS scheme is a standalone response to a different productivity challenge: carrying more freight with fewer vehicles. This contrasts with the *whole-of-economy* productivity benefits offered by HZEVs, be they fuel security, pollution, health, emissions, noise, climate or energy efficiency.

The PBS system is used overwhelmingly as a compliance pathway for diesel-fuelled vehicles; it does not offer distinct and differentiated concessions based on a vehicle's drivetrain. For this reason, the EVC advocates for standalone concessions for HZEVs separate to any reform proposals within the PBS system.

*Are there any additional changes or approvals required to ensure operators can make use of the mass concession?*

The single most impactful change to accelerate heavy EV adoption would be to reverse the current burden that places the onus on individual operators to justify their access rather than on road managers to justify restrictions. The current system effectively bans

HZEVs everywhere unless operators can individually negotiate access – a burden that falls entirely on private industry and compounds the already significant costs of fleet transition. Any system that reverts to road access decisions being made by a plethora of individual road managers will reproduce the productivity constraints that exist today.

Integration with local government road networks is equally essential. Local Government Authorities manage approximately half of Australia's public roads, meaning that virtually every heavy EV deployment will inevitably rely on LGA-managed assets — whether accessing a depot, a distribution centre, or a customer delivery point. Any system requiring an operator to individually negotiate access agreements with the 530 LGAs across the country is slow, unscalable and fundamental drag on national productivity.

*Are there cases where the concession should not be automatically applied? Why?*

The EVC acknowledges there may be some decisions on HZEV access that may need additional consideration, but these can largely be managed via existing safeguards.

Australia already has a well-established framework for managing the infrastructure impacts of heavy vehicles, including dedicated legislation, load-limit signage, bridge restrictions, and designated routes that restrict access by exception where needed. All HZEVs sold in Australia will be required to meet Australian Design Rules and their drivers must continue to comply with Australian Road Rules, including those governing access, mass restrictions and loading. HZEVs would remain subject to this existing compliance framework.

*Is a three-yearly review process appropriate? What benchmarks should be considered in the review process?*

Where a concession cannot be made permanent, any temporary arrangements for heavy EVs must provide meaningful regulatory certainty if they are to support genuine investment in fleet transition. Businesses cannot reasonably be expected to commit to new heavy vehicle assets (which represent significant capital expenditure) when the rules governing where those vehicles can operate are subject to change every three years or less.

A minimum review period of at least five years is essential. This would align with standard fleet lifecycle practices, as large operators typically hold new heavy vehicles for five years before moving them to the secondary market. A five-year review period should be treated as an absolute floor, not a default.

To ensure that any future reviews are grounded in evidence rather than speculation, robust governance arrangements should accompany any concessionary framework, including:

- An industry advisory board should be convened to ensure government decisions are made using operational 'on the ground' inputs
- Advice on adverse infrastructure impacts from road asset managers must be supported by engineering evidence of damage, not speculative claims
- Independent third parties (e.g. researchers, engineering consultants, Austroads) should be engaged to confirm/peer review any infrastructure impacts

Such an arrangement strikes the right balance between affording trucking businesses with the certainty to invest while monitoring future road infrastructure impacts.

*To what extent would changes assist and/or accelerate the uptake of uptake of electric HZEVs?*

A mass concession for HZEVs should be understood as a fundamental *precondition* for their uptake in Australia – not merely an ‘assistive’ or ‘accelerating’ measure.

Under the current Heavy Vehicle National Law, many electric prime movers and heavy electric rigids are classified as Restricted Access Vehicles, effectively imposing a de facto ban on their free use of Australian roads. So long as Australia’s bespoke access rules prevent as-of-right access for the international EV models developed for global markets, Australia will continue to miss out on the most productive technology and the most fit-for-purpose vehicles.

Australia’s unique restrictions disproportionately impact high-productivity urban distribution, intrastate operations on regional routes and line-haul duty cycles enabling cross-border freight movements. The PC’s proposed changes would enable the electrification of these duty cycles in a meaningful, scalable way for the first time.

Without a meaningful mass concession that specifically addresses steer axle mass limits, the regulatory environment will continue to frustrate both the transition to cleaner freight and the broader economic and environmental benefits that come with it.

In contrast, analysis by the Energy Futures Foundation finds that a comprehensive mass concession could enable:

- Up to 2,500 additional heavy EVs in the first year
- Approximately 6,300 by the end of Year 2
- A cumulative 18,700 within 5 years of the concession

*What road wear impacts will this have at anticipated take up rates?*

To the best of the EVC’s knowledge, there have been no proven road maintenance impacts attributed to real-life deployments of HZEVs in Australia to date. Given that infrastructure impacts remain largely theoretical, a precautionary blanket ban of HZEVs is neither warranted nor proportionate, even under the higher uptake scenarios above.

HZEVs and other modern heavy vehicles are safer and less damaging to road infrastructure today than ever before, whereas access limits have largely remained unchanged for 35 years – broadly the same period in which the PC itself has noted declining road freight productivity.

Road wear impacts must cease to be the overriding public policy consideration in reforming Australia’s heavy vehicle rules. The impacts of our heavy vehicle fleet do not stop at the kerb – they cost the national economy in public health outlays, childhood asthma and respiratory disease, road trauma, air quality, carbon emissions and climate change, fuel security and supply chain resilience. Against this backdrop, the EVC cautions against giving undue weight to the *infrastructure* impacts of any proposed heavy vehicle reforms.

**Information request 4.1:** How much would draft recommendations 4.1 (Make the Electric Vehicle Charging Infrastructure Mapping Tool more relevant to HZEV charging) and 4.2 (Adapt land use regulation to HZEV charging infrastructure) reduce administrative and regulatory barriers to heavy zero emissions vehicle charging infrastructure and what implications would this have for project costs?

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### **Overarching Comments - Joint Planning for Heavy and Light Vehicle Charging**

As Australia's charging infrastructure policy matures, the EVC strongly encourages government to consider planning for heavy and light vehicle charging jointly, rather than as entirely separate workstreams. While there are substantive differences in the size, location, power requirements, and general approach to HZEV charging relative to light vehicle charging, treating these as wholly distinct domains risks forgoing clear learnings, synergies, and cost savings that come from aligned thinking.

The light vehicle public charging market has developed considerably over the last decade, with more than 4,000 public plugs now available nationally. That experience has generated hard-won institutional knowledge (on DNSP engagement, planning approvals, site selection, and the use of tools such as the EVCI Mapping Tool) that should be actively drawn upon as HZEV infrastructure policy takes shape, rather than reinvented from scratch. The interactions between charging operators and DNSPs in particular represent an area where aligned approaches across vehicle segments could reduce duplication, improve grid planning outcomes, and lower costs for both proponents and networks.

This does not mean the differences between heavy and light vehicle charging should be minimised. They are real and significant, and HZEV infrastructure will require its own tailored policy responses, as the recommendations below reflect. But the starting point for that work should be a clear-eyed assessment of what already exists, what has been learned, and where common frameworks can apply. The EVC is itself beginning to work through with its members how these work programs can better align and looks forward to bringing those insights into future policy engagement.

### **Draft Recommendation 4.1 - Make the EVCI Mapping Tool more relevant to HZEV charging**

The EVC supports efforts to increase transparency of the current electricity grid as a means of facilitating new EV charging infrastructure and cutting down both connection costs and timeframes. However, the EVCI Mapping Tool cited in the draft recommendations was not designed for this purpose and extending its scope to HZEV charging without a prior wholesale review risks producing outputs that are misleading or inadequate for the investment decisions they would be expected to inform.

As the *Charging Ahead* report (November 2025) makes clear, the tool is explicitly limited to public fast charging for light vehicles. Even within that constrained scope, it carries significant methodological limitations (e.g. its reliance on a fixed set of 1,618 localities, broad plug-count bands rather than precise figures, the complete absence of any guidance on public AC charging) that have already produced forecasts diverging materially from both AEMO/CSIRO modelling and international benchmarks. Simply layering HZEV functionality onto a tool with these unresolved limitations would compound rather than correct the problem.

More broadly, DNSPs may not always have sufficient granularity of data to deliver the kind of investment certainty envisaged in the draft recommendation. HZEV charging also presents fundamentally different planning requirements (e.g. power levels, site footprint, grid connection scale, depot versus public hub distinctions, corridor logic) that cannot be accommodated through incremental adjustment to a passenger-vehicle-oriented model.

The EVC therefore supports a two-stage approach:

1. A wholesale review of the EVCI Mapping Tool, conducted with genuine consultation across government, networks, CPOs, freight operators, and the broader industry to assess its current limitations and establish what a fit-for-purpose national planning tool should look like across all segments.
2. A defined scope of augmentation work informed by the outcomes of that review, including new funding and resourcing, where required.

Accepting the recommendation in its current form, without that sequenced review, risks locking in an inadequate solution and displacing the more substantive reform the tool actually requires. In providing its in-principle support to incorporating better grid capacity data into public information, EVC notes that integrating with the Federal Government's existing datasets on the [freight datahub](#) would be a logical and well-scoped next step.

The EVC aims to provide its own gap analysis of the EVCI Mapping Tool as part of its National EV Charging Roadmap work, which is likely to commence later this year. EVC would welcome the opportunity to engage with government on those findings before any changes to the tool's scope are progressed.

### *Project cost implications*

The benefits of an improved HZEV-relevant mapping tool would flow primarily through reductions in pre-development costs rather than direct construction savings. Current barriers drive cost through protracted feasibility processes, duplicated demand modelling, and reactive DNSP engagement at a project-by-project level. A well-integrated HZEV planning tool would reduce these upstream costs and, critically, provide a credible basis for grid-aware site sequencing. The *Charging Ahead* report notes that transmission and distribution networks will require significant upgrades to manage the approximately 10GW of additional demand that electrified road freight is projected to impose by 2040. Better spatial foresight through the mapping tool would allow that network investment to be sequenced more efficiently, reducing the risk of both stranded assets and costly emergency augmentations driven by unplanned demand. These benefits are contingent, however, on the tool first being fit for purpose – which is precisely why EVC's position on sequencing the review before augmentation is directly relevant to cost outcomes.

**Information request 4.2:** What regulatory or administrative actions should governments take (if any) to facilitate private investment in charging infrastructure at state and territory government-provided heavy vehicle rest areas?

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The EVC strongly endorses this recommendation as addressing one of the most acute and underappreciated barriers to HZEV charging infrastructure deployment. Australia has tended to frame public charging as an electricity market matter, when in practice it is equally (and in many cases primarily) a land use, road access, and property development

challenge.

Broadly, Australia continues to suffer from uncoordinated and haphazard planning of charging infrastructure – for EVs of all kinds. This impacts not just the uptake of HZEVs but potentially also future grid system planning if new load sources from truck charging corridors are not fully factored in (e.g. in AEMO’s [Integrated System Plan](#)). This underscores the EVC’s call for a single, unified national charging roadmap for EV infrastructure that includes and integrates charging for *heavy* EVs - a gap that the recommendations in this submission are, in part, designed to address.

Nevertheless, aligning long-distance HZEV chargers with existing rest stops amounts to ‘low-hanging fruit’ in the deployment of the freight infrastructure Australia will soon require. Use of HZEVs in long-distance line-haul applications is currently undermined by a lack of charging infrastructure, which in turn is undermined by a lack of HZEV deployments. An explicit policy aimed at future-proofing truck stops to allow recharging of drivers and vehicles alike offers a no-regrets way forward. At a minimum, where federal/state governments are *already* investing in major highway upgrades (e.g. the [rebuild of the Bruce Highway](#)), provision for heavy vehicle charging infrastructure should be integrated in all design work, as standard.

The EVC notes the Commonwealth’s [Heavy Vehicle Rest Area initiative](#) currently offers no explicit support for including HZEV considerations as part of the program. Equally, the Austroads [Guidelines for the provision of heavy vehicle rest area facilities](#) has not been updated since 2019 and is mostly silent on EV charging. An update to both initiatives would be a logical administrative pathway for facilitating charging infrastructure going forward.

In addition, a dedicated lighthouse project for Australia’s first ‘green freight corridor’ project would help crowd-in private investment and break the current chicken-and-egg paralysis. [International best practice](#) suggests a priority focus on high-volume freight routes is an effective way of kickstarting investment certainty for long-haul applications of HZEVs. The EVC endorses the as-yet unfunded [proposal to electrify the Hume Highway](#), as one example of what a ‘green freight corridor’ could look like in Australia.

**Information request 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)?

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For the most part, curfews in Australia are not a formal regulatory mechanism with defined policy goals, rather they are the de facto impact of a series of noise and access restrictions that often have no regulatory impact statement or policy rationale.

Many LGA planning frameworks were designed for a different era — one defined by loud, emissions-heavy diesel operations. While formal road-level curfews are relatively uncommon, the more significant and pervasive restrictions are embedded in individual planning permits and local planning schemes, which typically limit loading and unloading activities to defined business hours. A cut-off of 6pm is common at the site level, with some facilities restricted as early as 5pm.

The prevalence of noise restrictions is difficult to assess without an exhaustive audit of Australia's 530-odd local government planning schemes. While some zoning categories dedicated to freight/industrial activity will be largely exempt of restrictions, it is reasonable to expect that most zoning rules for commercial, mixed use or residential areas will be subject to some form of operating restrictions on freight deliveries (i.e. based loosely on the amenity assumptions described above). To the extent that such zones are present in each LGA, the EVC estimates some form of de facto curfew or reduced operating windows are present in most local planning schemes in Australia.

Importantly, monitoring and compliance with such rules is typically ad-hoc. EVC members have anecdotally reported curfew rules being enforced mainly in response to complaints from neighbouring properties or businesses. There seems to be a lack of quantitative or consistent curfew compliance systems Australia-wide and no requirement for local authorities to justify operating restrictions.

Loose conditions and vague policy goals may have been reasonable responses to broader amenity concerns from local communities at the time when planning rules were established. They are less justifiable in the face of quiet, zero-emission electric vehicles that produce no tailpipe emissions and significantly less acoustic impact than their diesel predecessors.

**Information Request 5.2:** The PC is seeking information to illustrate the costs and benefits of reducing curfews on heavy zero emissions vehicles and the costs and benefits of possible approaches to reform, along with their implementation.

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The practical consequence of these outdated restrictions is that they actively undermine national freight productivity. By confining deliveries to daytime windows, curfew rules inadvertently push truck movements into peak traffic periods — both in the morning when vehicles depart loaded, and in the evening when they return to depot. Drivers arriving before permitted hours must wait idle in surrounding streets, wasting time and adding unnecessary congestion to local roads. Rather than protecting communities, these rules are locking freight into the busiest and least efficient periods of the day.

For operators who have already invested in heavy electric vehicles, the impact is particularly acute. First-mover EV fleets are being prevented from realising the full productivity value of their low-noise vehicles, despite those vehicles producing none of the diesel noise or emissions that the original curfews were purported to address.

The opportunity cost is significant. Even a modest extension of the delivery window — from 6pm to 9pm or 10pm — would unlock a disproportionate share of productivity benefit, coinciding with a period of rapidly declining congestion and improved travel speeds. Modelling by the Energy Futures Foundation estimates that exempting electric trucks from noise curfews could add 500 additional electric freight vehicles to the road within the first year alone, saving approximately 12 million litres of diesel and delivering around \$36 million in annual freight cost savings at current fuel prices.

Extending operating windows for heavy electric vehicles — even modestly — would deliver substantial productivity gains for individual operators (see **ANC Case Study** below). At the fleet level, modelling by the Energy Futures Foundation estimates that exempting electric trucks from noise curfews could bring an additional 500 electric

freight vehicles onto Australian roads within the first year alone. This would save approximately 12 million litres of diesel annually — equivalent to around \$36 million in freight cost savings at current fuel prices. These figures represent only a first-year estimate; as EV fleet numbers grow, the cumulative productivity, fuel, and emissions savings would scale significantly beyond this initial projection.

Further to these wider benefits, the improved productivity impacts of removing noise restrictions for HZEVs could extend to:

- Traffic congestion benefits derived from ‘off-peak’ deliveries (e.g. reduced travel times, lower dwell times, improved economic output)
- Increased utilisation of loading docks and higher freight throughput, as a function of decreased curfews/increased operations; flow-on effects across Australia’s supply chains
- Energy demand management and heavy EVs as more flexible load shifting on the grid (i.e. daytime charging during excess solar generation, more night-time operations)
- Workforce participation from more flexible shifts/greater operating hours.

Similar to the PC’s other draft recommendations, it is critical that any reform of HZEV noise restrictions is enduring and permanent. Early adopter fleets already face significant investment uncertainty given the emerging regulatory landscape for HZEVs. To *scale* the productivity benefits across a wider range of operators, any exemptions from noise restrictions should be made on an ongoing basis, not as a temporary fix.



**THE COST OF THE CURFEW: How delivery-time restrictions impose real costs on zero-emission urban freight — and the case for reform**

Current noise curfews — typically restricting deliveries after 6 pm — apply equally to diesel and zero-emission vehicles (ZEVs). For operators such as [ANC Delivers](#) running battery-electric fleets, these restrictions eliminate the very productivity and environmental benefits that electrification is designed to deliver. ANC is a leader in last-mile deliveries using zero-emission electric freight vehicles. This case study, illustrated through ANC's work with toilet paper retailer, [Who Gives a Crap \(WGAC\)](#), quantifies the cost of those restrictions and the uplift available through regulatory reform.<sup>1</sup>



The problem is systemic rather than local. Curfews are fragmented across hundreds of metropolitan LGAs — embedded in individual planning permits, shopping centre access rules and zoning conditions — making permit-by-permit negotiation unworkable at scale. Enforcement risk is asymmetric: a single community complaint can trigger immediate compliance action, even where noise impact is negligible.

**Illustrative Cost Build-Up — WGAC Metro Route (Single Vehicle, Per Day)**

Using ANC's Who Gives a Crap metro delivery operations as a worked example:

Cost Component	Indicative Impact
<b>Peak congestion — additional travel time</b>	+10–15% route duration (≈ 0.8–1.2 hrs/route); \$80–\$120/vehicle/day in extra labour and fuel
<b>Route compression inefficiency</b>	Forced single daytime window; suboptimal stop sequencing and extended dwell times
<b>Failed &amp; repeat deliveries</b>	Higher re-delivery rate where customers are unavailable during daytime windows; \$20–\$30/vehicle/day
<b>Asset underutilisation</b>	Vehicle idle despite remaining driver hours and battery capacity; second 'twilight shift' inaccessible
<b>TOTAL COST IMPOSED BY CURFEW</b>	<b>\$100–\$150 per vehicle per day</b>

<sup>1</sup> The above figures are broad-based estimates for indicative, non-commercial purposes only. The approximations do not account for the significant movement in supply chain costs stemming from the current fuel crisis.



**Scale Effect: Fleet-Level Costs**

Fleet Size	Daily Cost (Low)	Daily Cost (high)
10 vehicles	\$1,000	\$1,500
50 vehicles	\$5,000	\$7,500
100 vehicles	\$10,000	\$15,000

**Savings Unlocked by Curfew Reform (Post-6 pm Access)**

Extending operating windows for EVs into the evening twilight period — even without moving to overnight operations — unlocks immediate and measurable productivity gains:

- 15–25% net productivity uplift per vehicle from uncongested roads and faster route completion
- \$100–\$150/vehicle/day in recoverable operating cost — equal to the loss imposed by current restrictions
- Double-shift potential: one EV supports two delivery runs per day within Chain of Responsibility limits, directly improving capital efficiency
- Fewer vehicles required to move the same volume, reducing fleet capital outlay and on-road congestion
- Lower failed-delivery rates as evening windows better match customer availability

**Link to EV Total Cost of Ownership**

The financial case for curfew reform goes beyond per-route efficiency. The daily savings of \$100–\$150 per vehicle are sufficient to fund approximately 80% of the current TCO gap between electric and diesel vehicles on dense urban delivery routes. This means curfew reform functions as a self-funding productivity measure — not a government subsidy — that materially accelerates ZEV adoption by improving underlying unit economics. Double-shifting, where permitted, can close the TCO gap entirely on high-density routes, dramatically shortening payback periods on high-capital EV assets.



**Bonus Benefit: Supply Chain Resilience**

Curfew exemptions for ZEVs deliver a compounding resilience benefit in periods of fuel market disruption. An EV fleet operating across an extended window can be redeployed and double-shifted to maintain delivery continuity even where diesel supply is constrained or rationed. At 30% zero-emission penetration, a flexibly operating EV fleet can sustain a significant proportion of total freight tasks without interruption — converting a regulatory reform into a supply chain insurance mechanism.

*What are the practical options for implementing exemptions for heavy zero emissions vehicles from curfews? If vehicles were to be exempted by heavy zero emissions vehicle status – how would this distinction be made and enforced?*

Identification of eligible vehicles would be straightforward; under nationally harmonised vehicle standards, heavy EVs in Australia are already required to display an "EV" triangle on their registration plate, providing an immediate and visible identifier for enforcement.

The EVC notes the limited and imperfect compliance mechanisms for *current* curfews, on HZEVs or any other vehicles. Operators have reported to the EVC that enforcement is typically by exception (e.g. in response to a neighbour's complaint) and that systematic monitoring by council officials is rare; there is a simple requirement that all businesses comply with the terms of their planning permit. Under any curfew exemptions for HZEVs such ad-hoc compliance action could simply be waived for HZEVs.

*How would a performance based approach work in practice, and what would be the associated costs?*

A performance-based approach is likely to be cost prohibitive to enforce and could inadvertently damage supply chain productivity instead of improving it. The EVC urges simplicity in the design of any curfew exemptions for HZEVs. All electric vehicles manifestly produce negligible acoustic emissions from their near-silent drivetrains; any additional performance-based metrics are likely to be unnecessarily onerous and superfluous. An electric drivetrain alone should suffice as the low-cost, low-compliance criterion.

*What would be the practical costs associated with implementing an outcomes based approach to regulating noise?*

The EVC recommends against replacing one set of red tape with another through an overly complex approach to curfew exemptions. As discussed above, existing noise restrictions have largely been introduced without defined policy goals or quantitative metrics (i.e. reduced operating hours instead of defined acoustic levels). Complex eligibility or monitoring rules under a performance- or outcomes-based approach for HZEVs could quickly become more onerous than the current restrictions placed on diesel vehicles, undermining the policy intent of the exemption in the first place.

An Australian Logistics Council survey found that just 6% of respondents were even aware that curfew rules changed during the pandemic, confirming that relaxed delivery windows caused negligible community disruption. Near-silent HZEV deliveries are likely to have even lower community impacts.

A blanket exemption on electric vehicles from operating restrictions is the fastest, lowest cost implementation approach. Periodic reviews of such arrangements would be the most cost-effective mechanism for fine tuning any unforeseen consequences.

*What would be the most effective means of implementing reform? What should be the respective roles of the Australian Government, state and territory and local governments?*

The COVID-19 pandemic demonstrated that curfew exemptions can be introduced rapidly across multiple jurisdictions when there is sufficient policy will — with the National Heavy Vehicle Regulator, NSW, Queensland, South Australia, and Victoria all implementing changes through existing legislative mechanisms within a short timeframe.

Indeed, many states have already made ‘emergency’ road access decisions in response to the current fuel crisis.

The most effective means of implementing curfew reforms for heavy EVs is through a nationally coordinated, state-led reform program — and the funding mechanism to drive this already exists. Under the National Competition Policy (NCP), the federal government has identified heavy vehicle productivity reforms and increased electric heavy vehicle uptake as priority areas, with participating states eligible to receive payments from a \$900 million National Productivity Fund (NPF). This creates a direct financial incentive for states to act and provides a ready-made framework for coordinating consistent reform across jurisdictions without requiring a single, top-down federal mandate. Given the economy-wide productivity benefits of an accelerated electrification of Australia’s freight system, the EVC is advocating for an additional ‘top up’ to the NPF in its next iteration.

**Information request 6.2:** The PC is seeking feedback on future reform directions for the National Heavy Vehicle Driver Competency Framework

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*Weight concessions in Australian licence classes to create parity between payloads for electric and diesel heavy vehicles and any safety implications of such a concession*

Australia's current licensing framework is inadvertently penalising electric vehicle operators and undermining the national freight task. Under existing rules, vehicles above 4.5 tonnes require a heavy vehicle licence – a threshold that was designed around diesel vehicles but disproportionately disadvantages electric equivalents due to a HZEV’s heavier battery packs. This "payload penalty" means operators are effectively losing revenue on every delivery and a reduced payload per vehicle means more vehicle movements to distribute the same volume of freight, with cascading impacts on congestion, road wear, emissions, and national productivity.

Internationally, jurisdictions have already moved to address this inequity. The UK offers light commercial EVs an additional 750-kilogram concession to offset the payload penalty, while New Zealand has gone further — allowing car licence holders to drive electric vehicles of up to 7.5 tonnes following recent regulatory amendments. Both measures have supported stronger uptake of EVs in the light commercial fleet. Australia's current threshold of 4.5 tonnes compares unfavourably with these benchmarks and leaves local operators at a structural competitive disadvantage.

The recommended reform is to raise the car licence weight threshold to 6 tonnes for electric vehicles only — a level that reflects the typical one-tonne payload loss experienced when switching to electric. This would allow EV operators to access a significantly larger pool of delivery drivers, offer payloads comparable to equivalent diesel vehicles, improve workforce resilience, and potentially reduce staffing costs.

*Recognition of the credentials, skills and experience of drivers with overseas heavy vehicle licences within Australia’s licensing system, considering the effects on safety, driver supply and productivity.*

For overseas and local drivers alike quickly adapt to an electric drivetrain but early adopters report an additional cost (time and investment) in training drivers to ‘get the most’ out of their HZEVs. Competencies such as regenerative braking, extending range/battery capacity and the basics of charging operations will be increasingly important and should form part of future reform directions for the Framework.