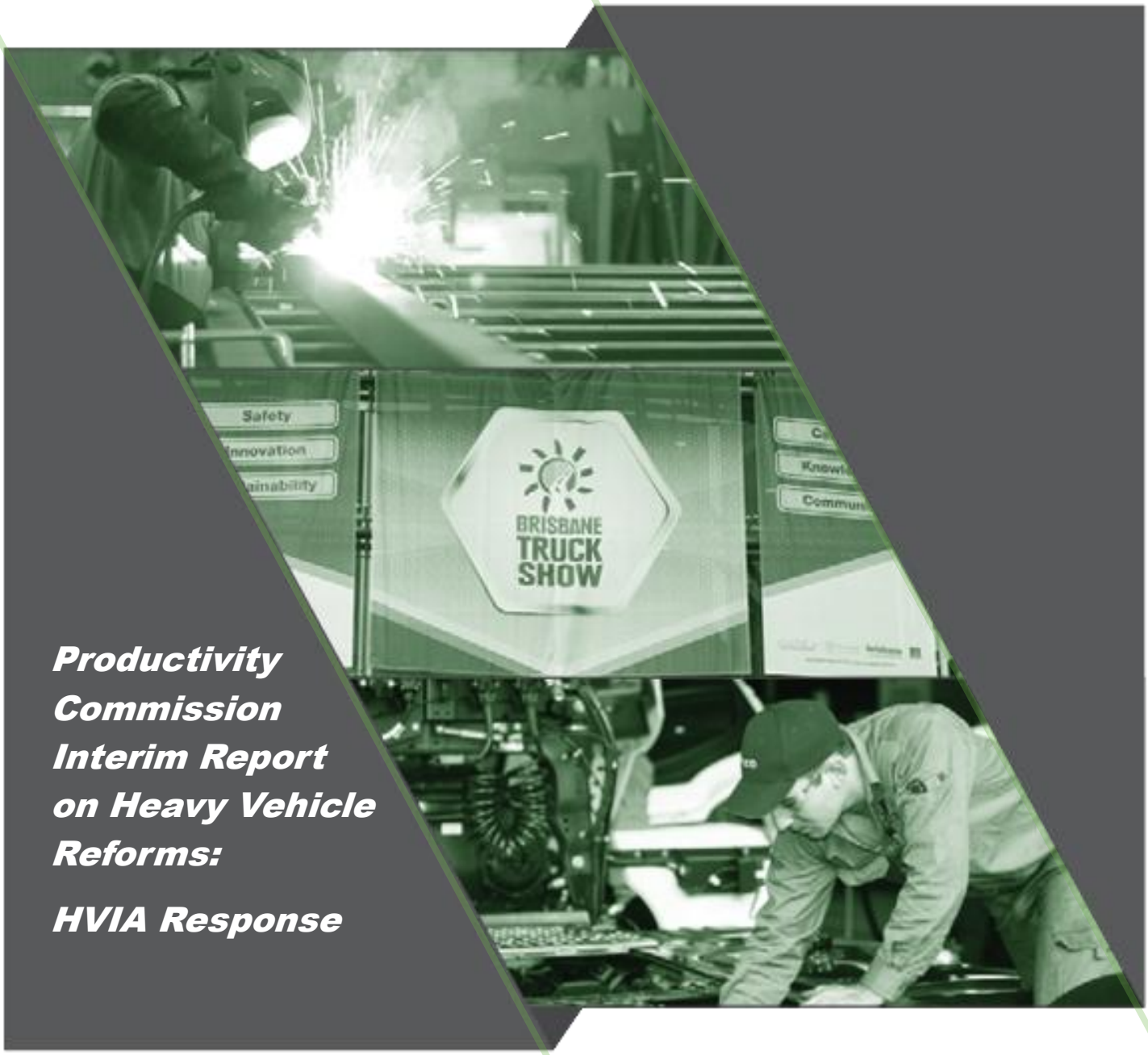
HEAVY VEHICLE INDUSTRY AUSTRALIA



Productivity Commission Interim Report on Heavy Vehicle Reforms:

HVIA Response

Heavy Vehicle Industry Australia
Represents and advances the interests of manufacturers and suppliers of heavy vehicles and their components, equipment and technology.

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Introduction

Heavy Vehicle Industry Australia (HVIA) is the peak national body representing the entire industry involved in the design, manufacture, importation, distribution, modification, sale, service and repair of on-road heavy vehicles.

We welcome the opportunity to make a submission to the Productivity Commission's *Interim Report on the Impacts of Heavy Vehicle Reform*.

Our comments in this submission build on the feedback we provided in December 2025 for the initial discussion paper, and we firmly believe this study presents an historic opportunity to identify and advance productivity and emissions improvements for the heavy vehicle sector.

While specific, discrete improvements can be made, a *step change* is needed from governments, regulators and industry leaders—not only to deliver meaningful productivity gains, but also to address the significant business pressures currently being faced by many operators. These pressures have become even more acute in recent weeks since the commencement of the Middle East fuel crisis.

We have sought extensive feedback from HVIA members on the Commission's Interim Report and their message was unambiguous – reform is overdue and is a must.

Overall feedback

HVIA believes the Interim Report is a thorough, detailed analysis that provides an excellent foundation for future decisions on policy reform. We congratulate the team at the Productivity Commission for producing such a comprehensive and considered set of recommendations.

We are greatly encouraged that many of the themes raised in HVIA's submission—particularly the need for a *step change* in approach—appear to have been reflected in the Commission's draft recommendations.

We are especially supportive of the Interim Report's finding that improved road access for high-productivity vehicles and heavy zero-emissions vehicles is critical. Supported by reforms such as automated access approvals, clearer planning rules for charging infrastructure, and updated curfew and licensing settings, these changes could help restart productivity growth while improving emissions outcomes.

We appreciate the variety of stakeholders and agencies involved in the reform process, however we believe that change and leadership in this space is overdue. For too long, HVIA members and the broader road freight industry have been frustrated by the regulatory complications, risk aversion, and inertia, affecting the nation's crucial road transport task.

We note that the draft recommendations are also in line with 'Level 2' temporary actions of the National Fuel Security Plan, which is for jurisdictions to consider regulatory reforms to improve freight efficiency (e.g. longer trailers, relaxation of truck curfews). These temporary emergency measures should be converted into a systemised, consistent, meaningful and permanent policy response—one that increases the uptake of higher-productivity vehicles and automates road access through an immediate, cost-effective and fair process that unlocks productivity.

Fundamentally, HVIA believes arrangements should incentivise (as opposed to penalise) the operators and vehicle manufacturers who seek to increase productivity through vehicle design and the uptake of higher-productivity vehicles compared to the prescriptive fleet.

Feedback on specific recommendations

Outlined below are specific responses to the Interim Report's recommendations. This feedback has been developed with the assistance of HVIA members.

Access for high productivity and heavy zero emissions vehicles

HVIA strongly supports Recommendation 2.1 that state, territory and local governments provide as-of-right access for PBS vehicles where it is safe to do so. Road managers should provide in-principle consent for as-of-right access for eligible PBS vehicles (that meet safety and infrastructure requirements) that is at least equivalent to access for comparable non-PBS vehicles. Governments should require that eligible PBS vehicles be added to existing gazettes/notices without requiring a new notice, nor lengthy jurisdictional review and approval of their addition.

Access constraints remain the single largest barrier to productivity in road freight. The current PBS approval process is overly complex, duplicative and costly. Road freight operations are frequently undertaken below optimal mass or dimension limits due to inconsistent access rules and reliance on permit-based approvals (see Text Box 1). As a result, PBS vehicles often operate below their engineered capability because access arrangements are fragmented. In many cases, access is granted on key freight routes only with substantial mass reductions. In some instances, the resulting payload is lower than the equivalent legacy vehicle, making the high-productivity freight vehicle (HPFV) commercially unviable.

Allowing eligible PBS vehicles to be added to existing gazettes and notices at their design mass—without requiring new notices or individual approvals—would drastically improve road freight productivity, materially reduce administrative burden, and improve fleet utilisation.

Box 1 - Example of East Coast Road Freight Issues

QLD

- 30m A-doubles are restricted over the Nerang River Bridge at 68.5 tonnes gross mass southbound.
- A-Doubles travelling north of Brisbane are restricted to 68.5 tonnes gross mass on the M1.

NSW

- A-Doubles are restricted over the Mooney Bridge Restricted to GML in both directions (79.5 tonnes gross mass) and B-triples at 83.0 tonnes gross mass.
- A-Doubles on the Hume Highway at Sheahan Bridge in Gundagai (are restricted to 76.0 tonnes gross mass northbound.

VIC

- A-Doubles from the SA Border suffer multiple restrictions. restricted to 73.0 tonnes gross mass on the Western Highway at Dimboola (B-Triples at 68.5 tonnes), and from Mildura restricted to 72.0 tonnes on The Calder Highway at Inglewood (B-Triples at 71.0 tonnes).
- Any vehicle travelling from Melbourne East to West (and reverse) is restricted at the Citylink tunnel to 77.5 tonnes gross mass (Dangerous Goods vehicles have to be restricted to 68.5 tonnes or worse and will require permits)

The above combinations are, in effect, missing out on 75-91 tonne approvals which constitutes a 20 - 25% potential productivity increase or even more, as some of the initial mass is spent on payload. A 15 tonne mass increase is likely to be all additional freight (and fuel savings would also be significant). In many cases, these vehicles are blocked by a single structure. Key freight corridors such as these would be considered more carefully for solutions rather than accepting a 68 tonne limit and 20- 25% more trips.

HVIA also supports the recommendation that the National Transport Commission amend the Heavy Vehicle National Law to remove the requirement to refer all PBS design approval applications to the PBS Review Panel (PRP) for advice.

Members support uplifting General Mass Limits (GML) to Concessional Mass Limits (CML), along with the proposed increases to general length and height limits.

Governments should also periodically review the 'General Access' vehicle settings to ensure mass and dimension limits keep pace with technological change and evolving supply-chain needs.

HVIA also supports the Commission's recognition that the beneficiaries of improved access are often not the entities responsible for infrastructure costs. Consideration should be given to requiring road managers to consider *productivity* when assessing applications, and to reducing the administrative burden imposed by the Performance Based Standards (PBS) framework.

HVIA urges that this recommendation be strengthened by requiring states and territories to publish asset capability maps within 12–18 months, and by adopting a "default access unless proven otherwise" rule for PBS Level 1 and Level 2 vehicles.

HVIA also considers that:

- The PBS scheme should be strengthened through a national PBS Template Library that provides pre-approved designs for common vehicle combinations.
- The PRP should focus on novel or higher-risk designs and should not review every application. If the PRP is retained to advise the NHVR, it should include stronger industry representation, including expertise in truck operations and technology. The independent Chair and Deputy Chair help, but industry requires a greater voice.
- Criteria for adding PBS vehicles to existing notices should be based on safety and infrastructure performance, supported by telematics-based monitoring to ensure ongoing compliance.

Currently, many PBS combinations rely on notices that effectively operate as quasi-legislative instruments. However, notices expire after five years, and access conditions are fragmented across multiple instruments. In addition, state and local road managers may decline to designate roads to the appropriate PBS network, creating significant network gaps and ongoing access uncertainty.

To address this, members have strongly urged that, the HVNL should require state and local road managers to designate each road to an access network—either the relevant PBS network (PBS Levels 1, 2A, 2B, 3A, 3B, 4A and 4B) or a prescriptive mass network (GML, HML).

Where a road manager fails to designate a PBS network, access should default to PBS Level 1 and Level 2 . An approved PBS combination should be eligible to access the applicable PBS networks at Tier 1 weights.

There is also strong support for requiring road managers to provide road-structure data to the National Road Structure Classification Standard (aligned with AS 5100) by a specified date (e.g., 1 January 2028).

Members also consider that the NHVR should provide an open-access API that is freely available to PBS approval holders. When a verified PBS vehicle approval is presented, the NHVR portal/API should return the approved Tier 2 PBS network, based on the designated PBS maps, the National Heavy Vehicle Structural Assessment Database and the National Heavy Vehicle Structural Assessment Standard.

The digital map should specify the maximum permitted mass for the approved PBS vehicle on each structure within the network. Each approved Tier 2 PBS map should be valid for up to 12 months; however, operators should also be able to query the national database for specific routes on demand (e.g., at the start of each journey). The digital map should be compatible with an approved mass measurement/monitoring system.

All approved PBS combinations should be eligible. HVIA does not consider it necessary for governments to rank nor prioritise PBS combination types, as PBS combinations meet the required PBS performance standards and operating conditions by default.

HVIA considers that the necessary safeguards, monitoring and review mechanisms are already available to maintain safety and protect infrastructure. These mechanisms should be explicitly recognised, supported and applied consistently.

In relation to PBS approvals (independent assessment and certification), HVIA supports the use of innovative mass monitoring programs such as IAP, TMA, and RIM for HML and for PBS network access (PBS Level 2 or higher). On-Board Mass Monitoring (OBMM) systems, which digitally measure and transmit axle-group and gross vehicle mass data in real time, should be used to support Tier 2 network access.

Better communication and solution-finding

A suggested approach in addressing these issues could be a regular forum where industry can put forth key access concerns regarding major routes and cost out the productivity loss.

Advisers in our industry go to extraordinary lengths to obtain access decisions and foster better communication chains and alternative solutions between the states and road managers, particularly for key freight corridors. Improved information could also be provided to other proponents seeking access.

In addition, there should be a dedicated effort to end the siloed management of key datasets and enable better sharing across agencies to track and understand heavy vehicles from first manufacture to end of life.

Implementing a mass concession for HZEVs

On Heavy Zero Emissions Vehicles, HVIA also supports Draft Recommendation 2.2 that there should be nationally-consistent axle mass limit concessions for heavy zero emissions vehicle (HZEVs), and that arrangements be put in place to embed those limits in the Heavy Vehicle (Mass, Dimension and Loading) National Regulation to ensure electric HZEVs can operate across jurisdictions without significant payload disadvantages arising from battery weights.

Battery weight remains a significant barrier to ZEV uptake, and mass concessions are essential to ensure payload parity with conventional vehicles. Governments should remove the regulatory barriers and improve the consistency across the network for HZEVs, including axle weights.

These reforms would deliver a clear productivity uplift and materially improve the commercial viability of HZEVs, which often require additional mass and dimensional allowances due to battery weight and associated equipment.

While some legacy infrastructure (including certain local bridges and older loading docks) may require assessment or modification to accommodate proposed dimensional increases, these issues are manageable and should not delay implementation.

HVIA members recommend a concessional increase of approximately 2.5 tonnes for rigid HZEVs, and 1 tonne for trailers towed in HZEV combinations.

Members have suggested 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.

Accelerating the National Automated Access System

HVIA strongly supports Recommendation 3.1 that, as far as practicable, the National Automated Access System (NAAS) be designed to deliver network-based access rather than automating prescriptive routes. This approach will maximise the system's benefits for operators and the broader community.

As a general principal, HVIA believes that NAAS should be fast-tracked so that improved access outcomes are delivered without delay.

HVIA also supports draft Recommendation 3.2 (Funding for the Strategic Local Government Asset Assessment Project) that the Australian Government fund future phases of the Strategic Local Government Asset Assessment Project, commencing with Phase 4 in the 2027–28 Budget.

Members have noted that improved guidance and better asset data are necessary, but not sufficient, to achieve timely and consistent access decisions.

Broader reforms are required to ensure local governments can make access decisions consistently and within appropriate timeframes.

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

For structures, members consider the NHVR should, by default, assume compliance with the latest bridge design standard (SM1600) unless a road manager provides verified evidence to the contrary.

Legislation should mandate use of the system and enable built-in cost recovery mechanisms. Where state or local road managers are unable to meet their obligations (including due to resourcing constraints), the framework should provide a pathway for responsibility for those road networks to transfer to the Australian Government. In that circumstance, the Australian Government should be responsible for ensuring those roads are maintained to acceptable standards.

Members have suggested that key constraints on NAAS implementation include limited digitised bridge and pavement data, shortages of specialist engineers, and inconsistent IT capability across local governments.

Where Australian Government funding is available, it should be directed to asset-data digitisation, training programs for local government staff, and development of a single national access decision engine.

Administrative and regulatory barriers to charging infrastructure

HVIA supports Draft Recommendation 4.1 (Make the Electric Vehicle Charging Infrastructure Mapping Tool more relevant to heavy zero emissions vehicle (HZEV) charging), and to make the Electric Vehicle Charging Infrastructure Mapping Tool more useful to guide investments.

HVIA also supports Draft Recommendation 4.2 (Adapt Land Use Regulation to Heavy Zero Emissions Vehicle Charging Infrastructure) and that State and territory governments should alter the definitions of land uses that cover bus depots, freight centres, freight nodes and heavy vehicle rest stops to explicitly allow for electric vehicle charging on land used in this way.

We also endorse that State and territory governments should exempt the installation of charging infrastructure from requiring planning permission where it is consistent with existing land use provisions. To the extent that jurisdictions apply conditions to manage any public impact, these should be balanced against potential impacts on innovation and investment.

There needs to be a clear roadmap on publicly accessible infrastructure, including a package of incentives like peppercorn leases, and sharing data on electricity grid network capacity along key national freight corridors to better inform charging infrastructure decisions.

Heavy vehicle curfews

HVIA agrees that there is a strong case for reducing curfew burdens on HZEVs.

ZEVs are significantly quieter than diesel vehicles, particularly during low-speed manoeuvring and acceleration.

Member trials indicate that ZEV night deliveries can reduce congestion impacts and improve delivery efficiency.

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

Removing curfews in metropolitan areas where it makes sense to do so (just like during COVID) are an example of a low-cost way to increase the adoption of HZEVs.

The National Heavy Vehicle Driver Competency Framework

As a general principle HVIA supports a Driver Competency Framework and believes it is important that operators are sufficiently competent, licensed and fit for duty but as HVIA's members are a step removed from the day-to-day transport operations, HVIA will leave it to the operators and operator advocates to provide specific commentary on this section.

Other issues

HVIA members have also reinforced the message that Low Carbon Liquid Fuels (LCLFs) need to be a central consideration in the road freight decarbonisation agenda. LCLFs offer one of the fastest and lowest-cost emissions-reduction pathways for the existing fleet, without payload penalties or major infrastructure upgrades. LCLFs should be recognised as a complementary decarbonisation lever alongside heavy zero-emissions vehicles.

We should be looking at how we can expedite the production of low-carbon liquid fuels (LCLF) and work with the fuel suppliers and truck OEMs on quality, standards and price point to incentivise adoption for the hardest-to-abate sector of the market.

Conclusion

In conclusion, HVIA welcomes the opportunity to provide this submission in response to the Productivity Commission's Interim Report on the Impacts of Heavy Vehicle Reform.

The Inquiry presents a timely opportunity to identify and advance productivity improvements across Australia's road freight system, while also supporting better safety and emissions outcomes. A national freight task needs a national policy response.

We warmly welcome the opportunity to discuss our submission further. Contact is via Todd Hacking .or Aaron Johnstone.