

## Department of State Growth

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Productivity Commission  
Inquiry into the Impacts of Heavy Vehicle Reform  
[NCP@pc.gov.au](mailto:NCP@pc.gov.au)

Dear Commissioners

Thank you for the opportunity to provide a response to the Productivity Commission's Interim Report on the Impacts of Heavy Vehicle Reform. Tasmania welcomes the Commission's continued focus on improving freight productivity, supporting the uptake of heavy zero emissions vehicles, and reducing unnecessary regulatory and administrative burden while maintaining safety and infrastructure integrity.

This submission responds to the information requests outlined in the interim report. Tasmania has responded where there is additional information to provide, consistent with Tasmania's earlier submission.

Tasmania remains supportive of nationally consistent, risk-based reforms that balance productivity, safety, environmental outcomes and the funding and capacity constraints faced by road managers, particularly in smaller jurisdictions.

Please also note that we also have emailed through a marked-up version of the report that identifies some potential factual inaccuracies in your original report that I wanted to bring to your attention.

If you wished to discuss our response further, please contact Ms Danielle Hofman, Assistant Director, Department of State Growth

Yours sincerely

James Verrier  
**Acting Deputy Secretary Transport**

6 May 2026

## **1. Context for heavy vehicle reform**

### **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:*

- *different cohorts, including by age, gender, income and education, and any other relevant demographic classification (including impacts on Aboriginal and Torres Strait Islander people)*
- *consumers, including in ways that may be difficult to quantify, such as improved quality of service or wellbeing, or greater choice.*

#### **Department of State Growth response:**

- Productivity improvements arising from the heavy vehicle reform package are expected to deliver particular benefits for regional and remote communities that are highly dependent on road freight. Flow-on benefits to consumers in these communities are likely to include improved service reliability, reduced freight costs and increased choice.
- Tasmania has not identified any material adverse impacts on any demographic cohort.
- However, as higher productivity freight vehicles (HPFVs) increase in size, parking and resting opportunities are reduced. To continue to attract and retain drivers—particularly female drivers, who are currently under-represented in the industry—the Department highlights the importance of funding additional heavy vehicle driver rest areas, as well as upgrades to existing facilities, to ensure they are fit-for-purpose and located on key freight routes.

## **2. Access for high productivity and heavy zero emissions vehicles**

### **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. 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?*
- *Will these reforms create any unintended consequences? What effect will they have on the interoperability of heavy vehicles with existing trailers, equipment and loading infrastructure?*

#### **Department of State Growth response:**

- The Mass Dimension and Loading (MDL) regulation reforms expected to commence in July are not designed to specifically facilitate access for HZEVs.

#### *Height*

- Tasmania will not apply the increase to height limits to 4.6m through the MDL reforms expected to commence in July.
- Increasing height limits generally comes with height-related stability risks, as loads that have a higher centre of gravity have an associated safety risk.

- Operation at heights up to 4.6m is currently available on authorised routes when appropriately assessed and mitigated through the PBS scheme. This remains Tasmania's preferred approach.
- Potential impacts on infrastructure, associated safety risks and network disruption remain significant concerns.
- Clearance restrictions below 4.6m, while not widespread, exist on key sections of the Tasmanian road network, including the approaches to the Tasman Bridge (Tasmania's busiest road corridor).
- Road closures resulting from height-related incidents at this location can disrupt the Hobart network for multiple hours and result in significant productivity losses across multiple sectors. More serious incidents (including major crashes or infrastructure damage) can result in multi-million-dollar economic impacts. Tasmanian industry has expressed similar concerns and has not sought changes to current height limit arrangements.

### *Mass*

- Uplifting General Mass Limits (GML) to Concessional Mass Limits (CML), and modest increases to length limits, are proceeding but are expected to provide few productivity outcomes in Tasmania.
- CML previously provided a small benefit to NHVAS accredited operators. Some operators in Tasmania have indicated disappointment that this benefit will no longer be provided to them, whilst road managers are concerned that the change will result in less operator side assurance and will lead to increases in frequency and levels of overloading. If this eventuates, road managers will need to consider options which could involve increased NHVR enforcement activities or to more generally require participation in the new Alternative Compliance Accreditation (ACA) – mass.
- Any access expansion must continue to account for infrastructure capacity, particularly pavement and bridge loading.

### *Length*

- The change from 19m to 20m for such combinations in the MDL is not expected to deliver material benefits in Tasmania, noting:
  - length limits from 19m to 20m were previously possible for those who sought it, with PBS vehicles if operating as a single semitrailer. There was very low take up in Tasmania, though this may increase over time.
  - Operators of B-doubles or truck and dog combinations are provided with 'as of right' access with lengths up to 21m (or in some cases 21.3m) through notices.
  - Differences in length limits between vehicle classes may have implications for trailer and equipment interoperability.

## **Information request 2.2**

*The PC is seeking feedback on how the Performance-Based Standards (PBS) scheme can be improved and enable greater as-of-right access for PBS vehicles over time. We are also interested in views around how the Australian Government can best support this process.*

- *Could there be any unintended impacts arising from not requiring the PBS Review Panel to provide advice on all PBS design applications? What types of PBS design applications should still require panel advice?*

Department of State Growth response:

- Tasmania supports provision of greater levels of ‘as-of-right’ access for eligible PBS vehicles where safety and infrastructure requirements are met.
- The ability to provide this access in Tasmania is through the National Automated Access System (NAAS). This does not require reforms with the first release of the system for a limited range of PBS vehicles already in place in Tasmania, and an upcoming release this year expanding will broaden the range of PBS combination options.
- Not all PBS design applications need to be referred to the PBS Review Panel. Panel advice should be retained for novel, complex or higher-risk vehicle designs, while common designs can continue to be progressed through streamlined pathways.
- Clear eligibility criteria, safeguards and monitoring arrangements would be required to protect safety and infrastructure.
- The most critical issue is funding to upgrade and maintain roads. Supporting expansion of networks for longer and heavier PBS vehicles will be challenging if issues with the heavy vehicle charging framework, and revenue distribution, are not resolved. Operating longer vehicles on below-standard networks comes with serious safety risks. A demonstration of what can occur on roads with inadequate width can be observed in this [footage](#)<sup>1</sup> (at approximately 2:00).
- Local government has identified that project funding to support maintenance (and new infrastructure) is a major challenge.
- Tasmania would welcome Australian Government support for analysis for provision of data to support NAAS. This is a major undertaking of the over the next year and beyond, particularly to capture data on the local road network.
- Additionally, aside from broader heavy vehicle road reform, there is an immediate need to provide for increasingly common PBS combinations which include ‘split-group’ axles. There is not a current defined registration category or charge for these. The pavement impacts from these if loaded to maximum axle group mass levels provides an in-equitable outcome if the charging is based on traditional prime-mover and semi-trailer charging levels. Tasmania supports the introduction of an appropriate categorisation as soon as possible.

*The PC is also seeking feedback on implementation issues, including how a pathway to add eligible PBS vehicles to existing notices (with in-principle road manager consent) could be embedded in legislation.*

Department of State Growth response:

*How should the mechanism be designed and implemented? Why?*

- The notice which provides access in Tasmania for PBS under NAAS is unlikely to require adjustment to accommodate the range of PBS vehicles.
- The NAAS itself controls what eligible vehicles are accommodated and can extend over time with jurisdiction and road manager’s consent.
- It is expected that once in place participation in fewer NHVR notices involving PBS will be the scenario (i.e. likely just one). However, if trying to transfer PBS vehicles into prescriptive notices there is a very large body of work involved. If Tasmania was to participate in such a pathway it would delay our NAAS trajectory, provide many disbenefits because access would be worst-case based, and due to the large body of work take a long time in itself.

*What amendments to the Heavy Vehicle National Law or related regulations would be required?*

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<sup>1</sup> <https://www.youtube.com/watch?v=9MeVvTYtJqA>

- Amendments to the HVNL are likely not required when using the NAAS. If trying to convert vehicles out of PBS, notice(s) would need to be developed, consents obtained. Alternatively, amendments to the HVNL could be attempted but would likely be a very lengthy process. Again, these options will further delay our advances under NAAS.

*Are amendments to the PBS classification system required?*

- Unlikely through NAAS. NAAS relies on individual performance metrics to determine safe access, rather than broader 'PBS Level' thresholds. If there are changes to the PBS scheme over time (e.g. changes to performance metrics) assessment (including under NAAS) needs to also adapt to any adjustments. If attempting to transfer vehicles from the PBS we don't see major (or any) adjustment to the PBS classification system itself.

*How should amendments be implemented to ensure eligible PBS vehicles can be added to existing notices without having to get access approvals, while ensuring existing access arrangements previously agreed by road managers are preserved?*

- Adjustments to notices or at least consented networks are highly likely to involve road manager consent if there are access related consequences.

*What criteria should PBS combinations fulfil to be eligible to be added to existing notices? Which specific PBS combinations should be prioritised? On what basis?*

- State Growth is prioritising providing access through the NAAS for these vehicles due to the volume of work and limited benefits this approach would likely have in Tasmania.

*What safeguards, monitoring or review mechanisms would be required to ensure the approach maintains road safety and protects infrastructure?*

- If such an approach was taken, Tasmania would be not embarking on this without ensuring that infrastructure and safety was assured. To ensure this, a conservative approach would be taken whereby in many cases access would be reduced compared to the access where performance metrics are known and can be used to provide best levels of access.

## **PBS**

- The PBS process itself has been streamlined over recent years with many common designs going through an accelerated approvals pathway.
- The PBS scheme demonstrates significant growth above expectations, with over 30,000 combinations and increases of 4,000 to 6,000 a year in recent years (up from <2,000 a year prior to 2020). This growth demonstrates the scheme is working and we consider it will further accelerate with greater provision of access through NAAS.
- In our role as a road manager understanding the performance characteristics of individual vehicles provides the ability to deliver best levels of access for that vehicle.
- Because transition of vehicles from the PBS may therefore lead to reduced levels of access in some circumstances, we do not encourage this pathway. However, we expect that if such a choice is made, we will be developing NAAS to accept non-PBS vehicles but with 'worst case' performance levels applied to them.
- Rather than transition vehicles from the PBS, we would encourage more vehicles to participate in PBS and focus on reducing the costs and further streamlining the timeframes associated with the assessments. We expect this should be possible with advancements in automation, particularly with less innovative designs.

### Information request 2.3

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

#### Department of State Growth response:

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

- Depending on the extent of the concession, there would ideally be appropriate road user charging implemented alongside a concessional mass limit that is intended to be used in the long-term.

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

- The concessional mass limits could be variable if they are linked to differential charging and distributed back to road managers and suitable networks. It is likely that any concession will be more restrictive prior to this being in place. We note that adjustments made to the HVNL Mass, Dimension and Loading Regulations in 2024 in relation to Euro VI mass limit concessions also apply to HZEVs, and this does provide a small increase in mass on steer and/or drive axle groups compared to earlier model diesel engines.

*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?*

- Any PBS vehicles which are HZEV will involve a new access permission including those mass settings. Tasmania is endeavouring to have the majority of PBS access transitioned to NAAS during the coming year. There will be additional work which would be involved to allow NAAS to receive higher masses for HZEV, it is a system that lends itself to accommodating this variability and delivering an immediate access output once in place. It is important to note that such functionality is not mapped out in terms of scope or timing within the current NAAS rollout.

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

- Unless the mass adjustments are insignificant, it is likely the access will not be general, but restricted. Therefore, an exemption or authorisation notice would need to be developed (ideally) or alternatively access provided through individual permits

*What are the expected impacts of applying the mass concession? To what extent would changes assist and/or accelerate the uptake of uptake of electric HZEVs?*

- Concessions are a critical factor to support higher mass or longer battery capacities, but many other factors (cost, availability, megawatt charging infrastructure, etc.) are also very important, and maybe more important depending on the freight task.

#### *Other comments*

- Tasmania has not received specific requests for operation of HZEVs on the Tasmanian network which are seeking to operate above regulatory masses.
- Any requests to undertake trials will be welcomed.
- Some HZEV buses are operating but within regulatory limits for buses in Tasmania and so do not require additional concessions.

- Unless mitigated in some way (e.g. wider tyres), higher axle masses will have impacts on road pavement lifespans and maintenance requirements. The elevated masses also need to be understood from a bridge capacity perspective. It is likely that for some shorter bridge spans the critical axle group in a vehicle is the drive tandem, and so elevation of this mass and the subsequent increase in stress on structures needs to be assessed and considered.
- Austroads is nearing completion of project [NEF6392 Future Freight Vehicles and Buses Implications for Road Managers](#) which aims to provide governments with an understanding of implications of the higher masses, and to inform decisions relating to changing of mass limits.
- Through engagement with other jurisdictions Tasmania is aware of the arrangements outlined in the paper. It is our understanding that the differences in concessions available across jurisdictions are a consequence the need to satisfy trials with HZEV providers and their quite varied range of requests.
- We consider these varied settings should be seen as interim approach prior to more consistent settings being put in place. Progression to a consistent national setting is welcomed but ultimately understanding infrastructure capacity and putting in place suitable road maintenance funding arrangements are part of this.
- We consider progression of future arrangements under Heavy Vehicle Road Reform (HVRR), the completion of NEF6392, and assessment of bridge structures for a range of configuration options being important steps.
- For the bridge assessment component, it is expected the current work under NAAS over the next 6 months will provide the platform to efficiently review the effects of elevated axle group masses against structural capacity.

### **3. Accelerating a National Automated Access System**

#### **Information request 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?*

#### **Department of State Growth response:**

- Under NAAS, a wide range of assessment modules are included to allow the system to deliver the access outcome and cater for the different vehicles and their utilisation of the road network.
- The data required to support NAAS needs to be fit for purpose and varies to an extent depending on the vehicle category being catered for. A critical aspect which is generally misunderstood is that it is inefficient to undertake broad data collection until the data requirements to support NAAS are understood.
- Improvements to our approaches and updated guidance is anticipated and is occurring in conjunction to development of the various assessment modules within the NAAS.
- Tasmania's Heavy Vehicle Access Management System (HVAMS) for both oversize and/or overmass (OSOM) vehicles and special purpose vehicles (SPVs) demonstrates how automated, network-based access can improve consistency and efficiency. The initial release under NAAS for PBS vehicles further demonstrates this.
- Critically, all of these releases have recognised the need by freight industry for access on both the state managed and local government managed road networks, and to achieve this the Tasmanian Government through Department of State Growth financial, technical and

leadership support local government throughout the process of developing the systems and collection of all data.

- Locally engaged consultants were engaged and were provided with strong guidance by the system developers and engineering experts within the Department along with the local road managers. This approach delivers a consistent approach and high-quality decisions across the state and critically has delivered good but safe levels of access in the systems rolled out. In Tasmania this approach has worked well and we anticipate it will continue to be utilised.

### **Information request 3.2**

- *What are the factors affecting implementation of the National Automated Access System?*
- *What are the main resource constraints (for example, skilled people, data and information or equipment), and what parts of the implementation do they affect?*
- *What would be the best way to accelerate rollout of the National Automated Access System? If more funding is needed, where should it be directed and what should it be spent on?*

#### Department of State Growth response:

- Under NAAS, there is clear distinction between the system development component (being delivered by the national team) and the data collection aspect. The former has an agreed funding plan in place for the next 3 years; however, the data collection is reliant on additional state and local government funding. To ensure this work can continue at pace funding support is critical, particularly for the local government aspect.
- Ongoing Commonwealth funding for local government asset assessments would support NAAS implementation and acceleration as soon as the relevant module builds are completed and the RM portal is in place.
- The development of the modules ideally needs to occur before widespread data collection. It is not efficient to do otherwise.
- Whilst the early releases for ADF and PBS have been possible without the completion of development of the NAAS road manager portal, for more efficient delivery across the country this development along with completion of the various assessment module builds is necessary.
- The project involves unique skills and there are several key dependencies both within the NAAS team and within participating jurisdictions

## **4. Administrative and regulatory barriers to charging infrastructure**

### **Information request 4.1**

*How much would draft recommendations 4.1 and 4.2 reduce administrative and regulatory barriers to heavy zero emissions vehicle charging infrastructure and what implications would this have for project costs?*

#### Department of State Growth response:

- Draft recommendations to improve land use definitions and planning exemptions are not expected to have a material impact in Tasmania, noting that no issues have been raised indicating that planning regulation is a barrier to the installation of charging infrastructure.
- There are planning exemptions in place to support the installation of charging infrastructure, including for car parks and minor infrastructure.

- Improving access to energy network infrastructure would provide the greatest improvement in Tasmania. Network owners have limited capacity to meet a major increase in demand for new access points.
- The Interim Report suggests the installation of charging infrastructure at various sites, including heavy vehicle rest stops. The ownership of these sites, and capacity of land owners or managers to install and maintain charging infrastructure is a critical barrier.
- For example, most rest stops in Tasmania are either informal or managed by the Department of State Growth. The need to resource and fund the installation and maintenance of charging infrastructure (including managing any payment for charging) is outside the scope of the department's current functions.

#### **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?*

Department of State Growth response:

- Some locations may remain unsuitable for charging infrastructure due to electricity network limitations. There may be benefits in governments working with providers to understand these limitations and identify opportunities to support infrastructure upgrades where necessary.

### **5. Heavy Vehicle Curfews**

#### **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)?*

Department of State Growth response:

- Local government restrictions through local planning rules have not been raised as an issue of concern in Tasmania.
- Tasmania does not apply general noise-based curfews on heavy vehicles on the state road network.
- Some of the time-of-travel restrictions apply for safety and congestion management rather than noise mitigation.
- Within the planning system, decisions on approvals and conditions are based on outcomes. The impacts of any decision (noise, lights etc.), and mitigations (e.g. using electric vehicles) would be considered.

#### **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.*

- *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?*
- *How would a performance-based approach work in practice, and what would be the associated costs?*
- *What would be the practical costs associated with implementing an outcomes-based approach to regulating noise?*
- *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?*

Department of State Growth response:

- Noting there are no noise-based curfews directly applied to road access for heavy vehicles in Tasmania, there would be limited, if any, impact on zero emission vehicles in Tasmania.
- The lower noise profile of heavy zero emissions vehicles present opportunities to reconsider curfew arrangements if there are such restrictions applied through the planning approvals in Tasmania and other jurisdictions. It is likely however in many situations that such operational restrictions are a consequence of multiple factors, not just engine noise. This might include loading/unloading noise and light disruption.
- Outcome-based or performance-based approaches may provide greater flexibility while maintaining community amenity.

## **6. The National Heavy Vehicle Driver Competency Framework**

### **Information request 6.1**

*The PC is seeking information on:*

- *the potential size of the costs and benefits, including the productivity effects, arising from the National Heavy Vehicle Driver Competency Framework reforms and if there are any costs and benefits not identified in this report*
- *how the costs and benefits of National Heavy Vehicle Driver Competency Framework reform might be distributed across the workforce, including by age, gender, income and education, and any other relevant demographic classification (including impacts on Aboriginal and Torres Strait Islander people).*

Department of State Growth response:

- Reforms to the National Heavy Vehicle Driver Competency Framework are expected to improve safety and support workforce supply over time.
- Implementation costs and capacity constraints remain a key consideration for smaller jurisdictions.
- The report has identified the ongoing implementation challenges across jurisdictions, as well as the slim likelihood of accelerating implementation progress.
- It is positive that the report addresses concerns about transparency in cost recovery, noting that Austroads is in the process of developing a Cost Recovery Agreement to clarify how state and territory governments will be expected to cover the costs of training and assessment materials.

- The report also references the funding mechanisms enabled by the National Competition Policy framework, which will allow the Australian Government to assist state and territory governments in implementing the proposed reforms. Although specific funding amounts are yet to be determined, Tasmania is particularly interested in learning more about this aspect as details emerge.
- It is pleasing to see the report referred to Governments facing both upfront implementation costs and some ongoing costs associated with administering the new licensing system and industry and licence applicants bearing the ongoing cost of greater training and assessment requirements. It is important that this is recognised.

## **Information request 6.2**

*The PC is seeking feedback on future reform directions for the National Heavy Vehicle Driver Competency Framework, including:*

- *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*
- *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.*

### Department of State Growth response:

- There were some unexpected elements grouped under the NHVDCF section as "Future Reform Directions." These include:
  - Proposals to consider weight concessions for electric vehicles within driver licence classes—effectively allowing drivers to operate comparable electric heavy vehicles without reducing payload; and
  - efforts to strengthen recognition of overseas heavy vehicle driver licences to address driver supply shortages.
- The matter of weight concessions for electric vehicles has not previously been raised with Tasmania.
- The report omits the jurisdictional concerns, previously raised by Tasmania with Austroads' project consultant, regarding industry apprehension about the recognition of overseas heavy vehicle licences. It's important that these concerns are incorporated into the feedback.