

8 May 2026

Productivity Commission

Level 8

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Australia Post Supplementary Submission: Interim Report on the Impacts of Heavy Vehicle Reform

Australia Post welcomes the Productivity Commission's interim report on the Impacts of Heavy Vehicle Reform (March 2026) and thanks the Commission for the opportunity to provide a supplementary submission.

Our overall view is that the interim report reflects many of the structural barriers facing heavy vehicle operators in Australia, and that the draft recommendations, particularly those relating to Performance-Based Standards (PBS) access, the National Automated Access System (NAAS), and land-use regulation for charging infrastructure, represent meaningful and achievable reforms that Australia Post supports.

This supplementary submission is structured in two parts. Part A sets out Australia Post's position on each of the Commission's draft recommendations and draft findings. Part B responds to the information requests most relevant to our operations and identifies three areas where we consider further work or additional recommendations are warranted before the final report.

Australia Post thanks the Commission for its work on the interim report and for the opportunity to provide this supplementary submission. We are available to discuss any aspect of this submission with Commission staff and to provide further operational data or case studies as required.

Should you require any further information about this submission, please contact Stuart McKay, Advisor Government, Industry and Regulatory Affairs.

Kind regards,

Brett Gale

General Manager, Government, Industry and Regulatory Affairs

Part A: Response to draft recommendations and findings

Access for high productivity and heavy zero emissions vehicles

Draft finding 2.1: Supported. The Commission's characterisation of the factors constraining heavy vehicle productivity aligns with Australia Post's operational experience. Inconsistent application of access rules across jurisdictions, reliance on permit-based access, and the misalignment between those who benefit from access and those who bear maintenance costs are the precise issues we raised in our initial submission.

Draft recommendation 2.1: Supported. Enabling greater as-of-right access for PBS vehicles and allowing eligible PBS combinations to be added to existing gazetted notices without a new notice, would materially reduce the planning and compliance burden on national operators. Australia Post supports the proposed amendment to the Heavy Vehicle National Law (HVNL) to remove the requirement that all PBS design approval applications be referred to the PBS Review Panel.

Draft recommendation 2.2: Supported. A nationally consistent concessional mass limit for electric heavy zero emissions vehicles (HZEVs), embedded in the Heavy Vehicle (Mass, Dimension and Loading) National Regulation, is essential to ensuring that battery weight does not create a payload disadvantage that slows fleet transition. The proposed three-yearly review mechanism is a sensible design feature.

Accelerating a National Automated Access System

Draft finding 3.1: Supported. Australia Post agrees that the existing permit system is ripe for reform. Our initial submission noted approval delays exceeding two years arising from the need to seek access across as many as fifteen local government areas for a single freight route. The Commission's data, showing over 318,000 local government permit requests and 196,600 NHVR cases in 2024-25, further underscores the scale of the inefficiency.

Draft recommendation 3.1: Strongly supported. The Commission's recommendation that the NAAS be designed around network-based access rather than the automation of prescriptive routes is a critical reform for national logistics operators like Australia Post. Network-based access would address the cascading approval delays our Network Operations team has identified, where a single council denial across a multi-LGA freight route forces a complete pathway redesign.

Network-based access would allow operators like Australia Post to plan freight movements on a network basis rather than route-by-route, substantially reducing the cascading delays that arise when a single council denies access and forces a redesign of the delivery pathway.

Draft recommendation 3.2: Strongly supported. Funding future phases of the Strategic Local Government Asset Assessment Project, starting with Phase 4 in the 2027–28 Budget, directly addresses the structural data gap that Australia Post identified in its initial submission. Without comprehensive asset data, risk-averse local road managers are likely to continue restricting access for HPVs and HZEVs. Local government inconsistency and planning barriers create significant freight and network planning constraints for national operators like Australia Post, and this recommendation would materially help to resolve them.

Administrative and regulatory barriers to charging infrastructure

Draft recommendation 4.1: Supported. Incorporating substation-level distribution network capacity, freight location and movement data, and land-use information into the Electric Vehicle Charging Infrastructure Mapping Tool would make it substantially more useful for fleet investment decisions. Australia Post supports the recommendation that all mapping data be exportable, which is necessary for integration with operator planning systems.

Draft recommendation 4.2: Supported. Updating land-use definitions for bus depots, freight centres, freight nodes and heavy vehicle rest stops to explicitly allow electric vehicle charging, and exempting charging installation from planning permission where it is consistent with existing land-use provisions, would address one of the most significant non-electrical barriers to HZEV charging rollout that Australia Post raised in its initial submission.

Heavy vehicle curfews

Draft finding 5.1: Supported, with a request that the frame be broadened. Australia Post agrees that curfews designed around diesel noise profiles are no longer fit for purpose for quieter HZEVs, and that there is a strong case for reducing curfew burdens on HZEVs. However, the interim report's framing confines the curfew question largely to a HZEV-noise issue. Australia Post's initial submission identified a broader productivity case affecting all heavy vehicles, and we ask the Commission to consider a more general recommendation in its final report. This is discussed further in Part B.

The National Heavy Vehicle Driver Competency Framework

Draft finding 6.1: Supported. Australia Post agrees that driver competency reforms are broadly on track and that targeted support for regulatory, policy and IT systems work in lagging jurisdictions would aid implementation. However, the interim report does not address the treatment of already-qualified drivers whose training already exceeds the new national standard. Without a clear transitional pathway, operators such as Australia Post, whose internal training programs already meet or exceed the proposed national standard, risk being required to retrain their existing driver workforce at significant cost, with no commensurate safety or productivity benefit

This is a gap that Australia Post asks the Commission to address, as set out in Part B.

Part B: Responses to information requests and gaps for further work

Information request 3.2: Accelerating the NAAS

The Commission has asked what factors affect implementation of the NAAS and what would best accelerate its rollout. Australia Post provides the following operational evidence.

Our initial submission noted that approval timeframes for heavy vehicle access across multiple local government areas can exceed two years. For high-volume national freight routes, a single freight pathway can require concurrent approvals from up to fifteen local councils. If any single council denies access or imposes restrictive conditions, the downstream segments of the route must be replanned, and fresh approvals sought from the remaining councils on the revised pathway, even where earlier approvals remain valid. This cascading effect compounds delays across the network.

On this basis, Australia Post submits that the following implementation priorities would materially accelerate the delivery of NAAS productivity benefits:

- Establishment of a publicly stated national implementation timeline by the Australian Government and participating jurisdictions, with interim milestones tied to the permit-reduction targets adopted by transport ministers (50 per cent reduction in three years and 90 per cent reduction in five years for all heavy vehicle types).
- Targeted funding for local government participation in NAAS, particularly for the structural asset assessments required to underpin network-based access decisions. Less-resourced councils are likely to remain cautious in the absence of both asset data and resourcing support.
- Clear governance arrangements covering the integration of existing state-based automated access systems, including Tasmania's Heavy Vehicle Access Management System, so that operators are not required to interact with multiple parallel platforms during transition.
- A single decision-maker model or binding coordination mechanism for multi-jurisdictional routes, so that a denial by one council does not unilaterally force a redesign of networks crossing other jurisdictions that have already granted access.

Information requests 4.1 and 4.2: Charging infrastructure

The Commission has asked for views on the extent to which draft recommendations 4.1 and 4.2 would reduce administrative and regulatory barriers to charging infrastructure, and on measures to facilitate private investment in charging at heavy vehicle rest areas.

Australia Post considers that draft recommendations 4.1 and 4.2 will meaningfully reduce two of the barriers identified in our initial submission, namely information asymmetry on network capacity and planning-system friction but will not by themselves address the most significant constraint on fleet-scale HZEV charging rollout: electricity network augmentation timeframes. This is discussed separately below under 'gaps for further work'.

On charging at heavy vehicle rest areas (information request 4.2), Australia Post reiterates our initial submission's recommendation that government investment in charging infrastructure should complement on-site and on-base (depot) charging, prioritising installation at highway truck-stops and driver rest areas. Specific measures that would facilitate private investment at state- and territory-provided rest areas include:

- Transparent and standardised access arrangements for private operators to install and operate charging infrastructure on government-provided rest area sites.
- Coordination with electricity distribution network service providers at the site-selection stage, so that rest areas prioritised for charging are those that can realistically be connected within commercial investment timeframes.
- Planning and design standards that ensure charging bays and site layouts at rest areas can accommodate the size and geometry of line-haul combinations, including B-doubles and longer PBS combinations.

More broadly, Australia Post considers that governments have a significant role in reducing first-mover risk, improving commercial certainty, and enabling coordinated planning across the energy and transport systems. Key barriers to private investment in charging infrastructure include high upfront capital costs, uncertain utilisation rates, lengthy connection and approval processes, and significant electricity network augmentation costs that are often borne by early movers. Addressing these barriers will require a combination of:

- Targeted co-funding programs to de-risk early investment in charging infrastructure at freight-critical locations;
- Streamlined planning and connection processes for charging installations at depots and rest areas;
- Strategic freight corridor and industrial precinct planning that integrates transport and energy infrastructure needs;
- Regulatory reforms that support anticipatory electricity network investment, so that grid capacity is available when fleet operators are ready to connect;
- Long-term policy certainty through clear freight decarbonisation pathways, vehicle emissions frameworks, and infrastructure investment strategies;
- Facilitation of demand aggregation across fleet operators to improve the commercial case for shared charging infrastructure;
- Support for interoperable charging standards and reformed electricity tariff structures for transport applications; and
- Leveraging public sector procurement and fleet transition programs to establish early anchor demand for shared charging infrastructure.

Information requests 6.1 and 6.2: Driver competency

The Commission has asked about the costs, benefits and workforce-distribution impacts of the National Heavy Vehicle Driver Competency Framework (NHVDCF) reforms, and about future reform directions.

Australia Post's internal driver training already exceeds the requirements of the existing regulatory framework and, in our assessment, will meet or exceed the reformed NHVDCF standard. On that basis, the productivity cost of the reform to Australia Post, and to other operators with mature training systems, will depend substantially on how the reform treats drivers who are already qualified under existing arrangements. Australia Post's position is set out in full under 'gaps for further work' below.

Draft finding 6.1 notes that NHVDCF reforms are broadly on track for implementation by 2028. The interim report does not, however, address how the reformed framework will treat drivers who are already qualified under existing arrangements, particularly drivers whose operator-provided training already meets or exceeds the new national standard.

Australia Post's position is that the productivity case for NHVDCF reform is supported, but it relies on implementation being focused on bringing newly qualified drivers up to a consistent national standard rather than on mandatory re-training of the existing licensed driver workforce. Mandatory re-training would impose substantial compliance costs on operators such as Australia Post whose internal training already exceeds the regulatory baseline, without a commensurate safety or productivity uplift.

Australia Post asks the Commission to consider a draft recommendation in its final report addressing the treatment of already-qualified drivers under the NHVDCF. In our view, the framework should:

- Focus mandatory training requirements on newly qualifying drivers.
- Provide a clear and streamlined pathway for recognition of prior learning where operator-provided training demonstrably meets or exceeds the national standard.
- Avoid mandatory re-training of already-licensed drivers as a default implementation approach, except where a specific safety or competency gap has been identified.
- Ensure that rest area site design, including charging bay placement and driver amenities, is consistent with applicable industrial relations obligations and enterprise agreement provisions relating to driver rest and break entitlements, so that the transition to electric charging infrastructure does not inadvertently compromise compliance with driver fatigue management and workplace rest requirements.

On the future reform directions canvassed in information request 6.2, Australia Post supports further work on weight concessions in Australian licence classes to achieve parity between payloads for electric and diesel heavy vehicles. Consistency between the vehicle-side concession proposed under draft recommendation 2.2 and the licence-side concession is necessary to avoid a situation in which an electric HZEV can lawfully carry a concessional payload but no suitably licensed driver is available to operate it.

Other areas of consideration

Australia Post asks the Commission to address the following two issues in its final report. Each of these issues was raised in our initial submission and is, in our view, not fully resolved by the current set of draft recommendations.

1. Electricity network augmentation timeframes

Access to timely and affordable electricity connections remains, in Australia Post's operational experience, the single largest constraint on the rollout of fleet-scale HZEV charging infrastructure. Network augmentation timeframes of several years are routinely misaligned with commercial investment horizons and fleet transition plans. Improvements to the Electric Vehicle Charging Infrastructure Mapping Tool (draft recommendation 4.1) will improve the visibility of this constraint, but do not address it.

A further challenge is the fragmentation of responsibilities across government and regulatory bodies. Freight decarbonisation strategies, corridor planning, electricity infrastructure investment, and land-use planning are managed by separate agencies, often with an overlay of state and territory decision-making. Transport planning and electricity system planning have historically occurred separately, meaning that infrastructure investment risks being inefficient, delayed, or poorly located without integrated planning across these systems

Australia Post asks the Commission to consider a further recommendation in its final report directed at the Australian Energy Regulator and distribution network service providers, aimed at:

- Setting transparent service-level expectations for connection assessment and quotation timeframes where the applicant is a heavy vehicle depot or designated fleet charging site.
- Considering whether regulatory incentives under the distribution network service provider framework could better recognise the economic value of timely connections for fleet-scale HZEV charging.
- Exploring coordinated site-selection processes between transport and energy agencies so that priority charging locations are identified early in distribution network planning cycles rather than treated as demand shocks at connection time.
- Establishing integrated planning processes between transport and energy agencies, including joint site-selection processes so that priority charging locations are identified early in distribution network planning cycles rather than treated as demand shocks at connection time, and so that fragmented decision-making does not delay fleet transition.

2. Curfews: a broader productivity frame

Draft finding 5.1 acknowledges the case for reducing curfew burdens on quieter HZEVs. Australia Post supports this finding but considers that the Commission's curfew analysis would benefit from a broader frame in the final report.

Curfews affecting all heavy vehicles, not only HZEVs, create a significant and under-recognised drag on freight productivity. Curfews vary by location, time of day, vehicle class and road type, and are often imposed at a local level with limited coordination across jurisdictions. For national operators, this fragmentation increases compliance costs and administrative burden, forces detours and idling, and can unintentionally concentrate truck traffic into peak periods when curfews force freight movement into a narrow window of lawful operating hours.

Australia Post asks the Commission to consider a draft recommendation in its final report directed at a more consistent, coordinated and evidence-based approach to heavy vehicle curfews. Specific elements could include:

- A nationally coordinated mechanism for the periodic review of local and state curfew settings, reflecting changes in vehicle technology, noise performance and safety standards.
- Guidance for local governments on the imposition of delivery curfews through planning permits, including the considerations that should be weighed in setting or reviewing curfew conditions.
- Consideration of an outcomes-based or performance-based approach to noise regulation, as flagged in information request 5.2, applied to all heavy vehicles rather than on the basis of powertrain alone.