

HERE Submission to the Productivity Commission: National Competition Policy Analysis 2025

1. Introduction

HERE Technologies is a global location data and technology platform, providing digital maps in over 200 countries. We help our customers understand and model a world that's always moving and changing: Cars use our location technology to navigate safely and efficiently, and logistics companies use it to deliver parcels globally. HERE serves more than 1,500 enterprise customers, including the world's largest logistics companies, automotive brands like BMW, Volkswagen and Ford, and technology companies like Amazon Web Services.

HERE welcomes the opportunity to contribute to the Productivity Commission's study on National Competition Policy reforms. Harmonising Australian regulatory frameworks with international standards is vital to reduce compliance costs, accelerate innovation, and strengthen Australia's competitiveness in mobility, digital and location-based services.

2. Key Opportunities for Reform

a. Transport and Automotive Standards

The automotive and mobility ecosystem is becoming increasingly global. Automotive manufacturers and suppliers rely on standards such as UNECE regulations, ISO 26262 for functional safety, and AUTOSAR for software architectures. Divergence from these standards in Australia can delay the availability of safety and technological advancements in the Australian market.

Benefits of Harmonisation:

- Seamless integration with global OEM vehicle platforms.
- Faster deployment of electric vehicle (EV) routing solutions and autonomous driving features.

- Reduced engineering and compliance costs, and improved product consistency across regions.

b. Data Access, Security, and Compliance

As a cloud-based geospatial platform, HERE adheres to international standards like ISO 27001 (information security) and ISO 9001 (quality management). Australia-specific duplication of conformity assessments adds unnecessary compliance layers.

Benefits of Mutual Recognition:

- Lower regulatory burden for cross-border data services.
- Greater agility in delivering machine learning models and analytics tools.
- Enhanced alignment with multinational partners and clients.

c. Smart Infrastructure and Urban Mobility

Australia's cities are seeking to improve transport efficiency, reduce emissions, and enhance liveability. HERE provides urban mobility analytics based on anonymised GPS data, geospatial modelling, and real-time sensor feeds. However, inconsistent local standards for sensor metadata, road infrastructure data, and traffic signalling protocols hamper the scalability of such solutions.

Benefits of Harmonisation:

- Interoperability of smart infrastructure projects using open global standards like OGC (Open Geospatial Consortium).
- Faster deployment of digital twins for urban planning.
- More consistent outcomes for smart city investments.

3. Illustrative Barriers to Harmonisation

- **Vehicle safety standards:** Automakers build vehicles with the capability to meet international safety standards (e.g. EU Vehicle General Safety Regulation). It is common for automakers to manufacture cars to comply with EU safety standards, and bring such EU-compliant cars into the Australian market. When safety standards are not harmonised, going through a separate type approval process for the Australian market adds compliance costs. Harmonising advanced safety innovations with international standards in road vehicles enhances road safety, reduces accidents, and saves lives.
- **Data standards:** Currently, DATEX II is the most common international standard which can facilitate the exchange and provision of transport data. HERE has faced challenges onboarding data which is not aligned with international standards (e.g. speed limit information data). Alignment of transport data with international standards will enhance the availability, quality, and freshness of data provided to Australians, road agencies, transport operators and policymakers.
- **Mapping SDK modifications:** APIs designed for global use often require customisation for Australia's metadata conventions, delaying time-to-market.
- **Geospatial data translation layers:** Australian road classification schemes differ from international formats like OpenDRIVE or INSPIRE, requiring additional transformation and reducing data accuracy.

4. Recommendations

HERE Technologies recommends that the Productivity Commission and relevant regulators:

- I. **Prioritise mobility and transport standards for harmonisation**, including:
 - Vehicle safety standards (e.g. UNECE regulations, EU Vehicle General Safety Regulation).
 - Road asset data formats (e.g. bridge heights, road signs).
 - In-vehicle communication protocols.
 - Intelligent transport systems (ITS) interoperability.

- II. **Adopt and recognise international conformity assessments** in regulation of:
 - Location data accuracy and validation.
 - Cloud-based spatial data processing and storage.
 - Privacy and security standards already validated in other trusted jurisdictions.
- III. **Ensure accessibility to mandated international standards** by:
 - Providing public access to referenced international standards in legislation.
 - Supporting stakeholder engagement in international standard-setting bodies (e.g. ISO, OGC, SAE).
- IV. **Establish a national coordination mechanism** to harmonise standards across Commonwealth, state, and territory regulators. As an example, the National Heavy Vehicle Regulator (NHVR) was established to drive productivity outcomes across the heavy vehicle sector, minimise the regulatory compliance burden, and harmonise heavy vehicle regulation across state and territory borders in Australia.

5. Conclusion

HERE Technologies supports the Productivity Commission's reform initiative and advocates for harmonising Australia's regulatory frameworks with globally recognised standards. This will:

- Promote adoption of advanced safety standards in road vehicles, enhancing road safety, reducing accidents, and saving lives.
- Enhance transport data available to Australians, road agencies, transport operators and policymakers to make transport more safe, efficient and sustainable
- Reduce compliance barriers for innovative businesses.
- Promote adoption of advanced location-based services.
- Enhance Australia's participation in global trade, mobility, and digital infrastructure markets.

We would be pleased to provide further details, examples, or engage in consultation to support this important study.

Submitted by:

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About HERE Technologies

HERE is the global leader in mapping and location technology. For 40 years, we've been powering innovation for the world's most recognizable companies: from launching our first digital map in 1985, to shaping the future of software-defined vehicles today. With the industry's freshest and richest unified map and a portfolio of products, services and solutions that serve the needs of multiple industries, HERE reveals opportunities that drive progress and unlock new possibilities for every moving vehicle. Discover more at here.com.