15 February 2024

Energy and Climate Ministerial Council
Department of Climate Change, Energy, the Environment and Water
Via email: NEVS@dcceew.gov.au

To whom it may concern,

**RE: Minimum operating standards for government-supported public electric vehicle charging infrastructure**

I write on behalf of Heavy Vehicle Industry Australia (HVIA) members in response to the consultation on developing minimum operating standards for electric vehicle charging infrastructure in Australia. HVIA is the peak body for heavy truck and trailer manufacturers and suppliers of technology, equipment, and services to the wider industry. Our 300-plus corporate members collectively employ a local workforce of over 70,000 staff.

HVIA is supporting the industry on its decarbonisation journey and is harnessing the experience of its members and stakeholders to resolve issues across regulation, policy, skills and training, and infrastructure.

HVIA agrees with the sentiments expressed under the National Collaboration on Electric Vehicles, and its goal of *"build[ing] a future where the value of EVs is maximised for consumers and industry".* By ensuring that the "*standards give consideration to accessibility … help[ing] EV drivers have confidence in Australia's EV charging network by improving access to reliable and accessible EV charging facilities*", HVIA expressly recommends that all vehicles be considered from the outset, including heavy vehicles.

**What is a heavy vehicle?**

The National Heavy Vehicle Regulator (NHVR) defines a heavy vehicle as follows:

> *A heavy vehicle is defined in the Heavy Vehicle National Law (HVNL) as a vehicle that has a Gross Vehicle Mass (GVM) or Aggregate Trailer Mass (ATM) of more than 4.5 tonnes. The GVM/ATM of a vehicle is the maximum it can weigh when fully loaded, as specified by the manufacturer.*

**Why are heavy vehicles a crucial part of decarbonisation?**

When considering Australia's total transport emissions, light vehicles (e.g. cars) account for 45 percent, and all types of heavy vehicles account for 40% percent (see Figure 1, below.). Failing to properly consider the contribution of heavy vehicles in emission abatement activities represents an immediate and significant missed opportunity, that will undoubtedly create large-scale problems in the future.

Furthermore, the urgency in supporting the transition of the heavy vehicle fleet is apparent when considering the future domestic freight task. Between 2020 – 2050, road freight is projected to grow by 77 percent, whereas rail, air, and shipping may not grow as rapidly. The total freight task is predicted to reach 964 btkm (billion tonne-kilometres) by 2050 from its current level of 765 btkm (see Figure 2, below).

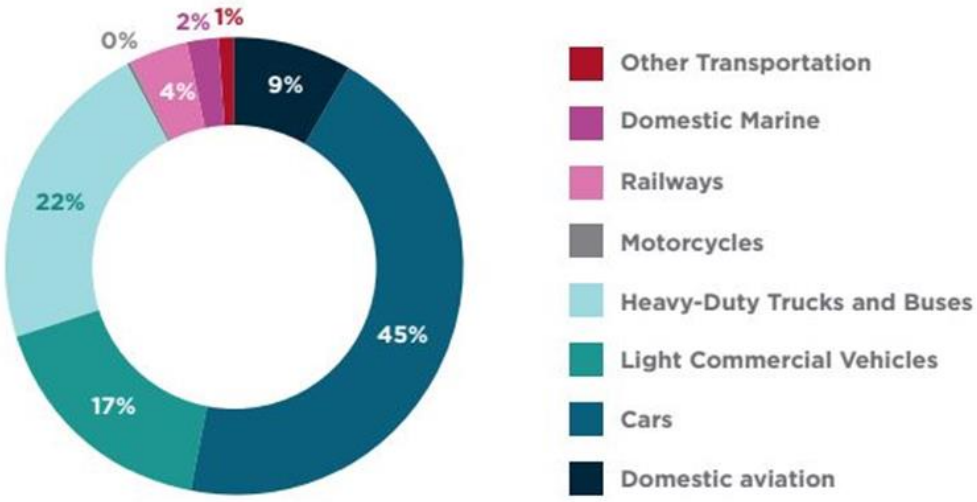


***Figure 1: Transport emissions by origin (source: National Greenhouse Gas Inventory, 2019)***

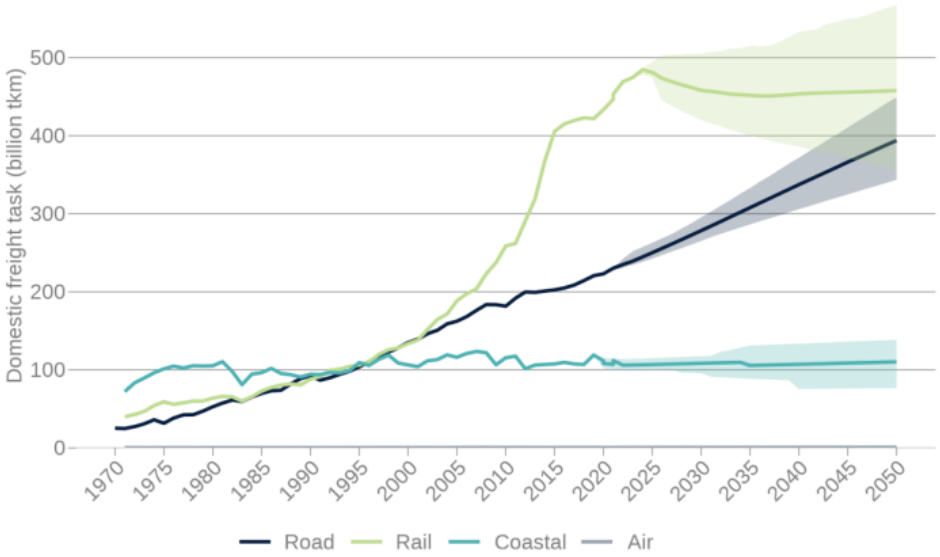


**Figure 2: Actual and projected future freight task by major transport mode (source: BITRE, 2020)**

HVIA acknowledges that the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts has a Net Zero Unit that is developing a Transport and Infrastructure Net Zero Roadmap and Action Plan. HVIA has provided feedback on the Roadmap, and also stressed the importance including heavy vehicles in the net zero transition.

Support and acknowledgement of the role of heavy vehicles is vital – all stakeholders have the opportunity to get the policy, regulatory, and strategic settings correct from the outset, rather than scrambling to incorporate electric heavy vehicles into a future designed with only electric light vehicles in mind.

**HVIA feedback on the proposed standards**

In preparing the below feedback, HVIA consulted with a select group of its members who comprise an internal working group and are actively engaged in low and zero emissions vehicles and initiatives.

- **Number of charging ports** – mandating a set minimum that is uniformly applied regardless of the characteristics of the route is not strategic. HVIA strongly recommends:
    - The minimum number of charging ports be calculated based on road traffic capacity, forecast usage (e.g. annual average daily traffic – AADT), or another metric that incorporates usage.
    - The addition of a requirement for dedicated heavy vehicle charging facilities on high-volume and/or strategic freight routes, as is the case with high-flow diesel fuel pumps.
    - Ensuring charging station capacity (and grid capacity) is sufficient to meet the demand of the heavy vehicles that are expected to access them.
- **Minimum availability** – whilst both planned and unplanned network outages are a reality of large-scale power distribution networks, the minimum availability metrics should encourage their impacts on vehicle charging to be minimised. Separate metrics including/excluding unplanned network outages should be developed.
- **Accessibility** – HVIA suggests:
    - A requirement for dedicated heavy vehicle chargers on high-volume freight routes (as above).
    - Allowing drive through bays with sufficient entry and exit clearance for the heavy vehicles that will be expected to access them, including their trailers, and consideration of possible queuing issues outside charging stations.
    - Road design sufficient to accommodate heavy vehicle axle loads and forces developed when turning and manoeuvring at low speeds.
- **Definition of 'larger vehicles'** – it is not clear what is meant by this term. It should be revised in-line with the above comments regarding heavy vehicles.

In addition to the above, HVIA stresses the importance of a national focus in enabling charging facilities on key and strategic freight corridors. Electric heavy vehicles may be unlikely to replace conventional diesel heavy vehicles for line-haul operations between major population centres in the short-term, however, for operations within those centres, charging infrastructure available will be important. Though charging will often occur at transport depots or receiving locations, options will be required for charging away from base.

Our industry's transition to net zero will take time, but more than anything it will take a coordinated and determined effort across industry, Government, and relevant stakeholders. HVIA looks forward to working cooperatively with the Department to assist the transition of the heavy vehicle industry to a net zero future.

If you have any further questions regarding the above, please do not hesitate to reach out to Adele Lausberg, Chief Advocacy Officer at a.lausberg@hvia.asn.au or on 0415 225 638.

Yours sincerely,

**TODD HACKING**
**CHIEF EXECUTIVE OFFICER**