



**HEAVY VEHICLE  
INDUSTRY AUSTRALIA**



## **HVIA Submission**

Discussion Paper on the  
Update of the Victorian Freight  
Plan

**June 2024**

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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## Background

Heavy Vehicle Industry Australia (HVIA) is the peak industry association for Australian manufacturers of trucks and trailers (collectively referred to as heavy vehicles), as well as the dealerships, repairers, suppliers, and service providers that support the entire industry. We represent almost every major truck manufacturer/importer, all of Australia's major trailer manufacturers, and an ever-growing list of their component, equipment and technology providers.

HVIA's 300-plus corporate members collectively employ a local workforce of over 70,000 staff. Our member's interests cover an extensive range of vehicles, starting with 3.5-tonne light commercial trucks, and extending all the way up to Australia's unique 50-metre long, 100-tonne road trains.

The industry provides some of the world's most efficient, safe, innovative, and technologically advanced vehicles. HVIA seeks to work with government and industry stakeholders to promote an innovative and prosperous industry that supports a safe and productive heavy vehicle fleet operating for the benefit of all Australians.

## General comments

HVIA is committed to working with all road managers and the national regulator to improve access and productivity outcomes for heavy vehicles. HVIA values the opportunity to provide comments on the Update of the Victorian Freight Plan Discussion Paper, from the Victorian Department of Transport and Planning (DTP).

**HVIA believes that, in the short term, the best way of improving the safety and productivity of road freight whilst reducing fuel consumption and emissions is to encourage the uptake of:**

- newer vehicles with better safety features and more advanced emissions equipment
- Performance Based Standards (PBS) and other high productivity combinations
- vehicles that use alternative fuels and energy sources.

HVIA notes that infrastructure deficiencies are often raised as long-standing impediments to increasing heavy vehicle productivity and access. HVIA does not dismiss those concerns, but calls on DTP to formally adopt the Transport for New South Wales (TfNSW) position outlined in its recent Draft Heavy Vehicle Access Policy:

*'...the basis for access decision-making must move from preserving assets to optimising the use of those assets by safe, productive and sustainable vehicles...'*

HVIA applauded that inclusion and is encouraging road managers at all levels to follow suit. The extensive prior work completed in Victoria to boost productivity is acknowledged, however the public commitment to that policy will deliver additional gains. HVIA understands the crucial role of funding in road infrastructure management, and supports calls for effective infrastructure funding mechanisms at the state and federal levels.

HVIA acknowledges the important work completed and the release of the Victorian network map for Low and Zero Emissions Heavy Vehicles (LZEHVs) operating at increased axle loads, but is concerned that as it currently stands, it only allows access for a specific set of LZEHVs. HVIA calls for its urgent expansion to accommodate LZEHVs of all types. In-line with prior comments, it should also be expanded to include the West Gate Bridge, as the critical infrastructure link between Melbourne's East and West.

There is another area of Victorian freight access policy that requires urgent attention. Right now, Victoria is the only state in Australia that charges applicants a fee for bridge assessments. Those assessments are required for industry to obtain operating permits for many heavy vehicle combinations, including B-doubles, A-doubles, Performance Based Standards (PBS) vehicles, quad-axle semi-trailers, and vehicle featuring next-generation low and zero emissions trucks.

Those vehicle combinations have been proven over and over to be safer, more efficient, and more productive than the vehicles that do not require such assessments.

Without exception, the fees are exorbitant, ranging from up to \$8,000 for a single vehicle on a single route, to over \$50,000 for multiple vehicles on multiple routes. In many cases, applicants cannot absorb such fees. If they can, they often cannot accept the risk that the assessment might yield a negative result. Both scenarios lead to countless innovative heavy vehicle projects being abandoned.

**Simply, the Victorian bridge assessment policy is stifling productivity, increasing congestion, causing greater emissions, and leading to less favourable road safety outcomes. HVIA calls for its immediate abolition.**

Further specific comments on the questions posed in the discussion paper follows.

## Responses to specific questions

Discussion paper question	HVIA response
<p><b>What are the three most important issues impacting your business that government can help you respond to?</b></p>	<ul style="list-style-type: none"> <li>• The regulatory roadblocks and impediments to improved vehicle productivity and safety, and a lack of incentives.</li> <li>• A lack of harmonisation in regulations between states, and within them.</li> <li>• The growth in the freight task, and the need to continuously improve efficiency and productivity due to economic pressures and constraints.</li> </ul>
<p><b>What do you think are the most important new directions or actions that government can include in the updated plan to address those issues?</b></p>	<ul style="list-style-type: none"> <li>• Focus on increasing the proportion of the total road freight task undertaken by high productivity freight vehicles by formally adopting a mindset of optimising utilisation of assets rather than preserving them.</li> <li>• Harmonise regulations across state borders, and within them (i.e. at the local government level).</li> <li>• Enact incentives to reduce the average age of the heavy vehicle fleet to drive uptake of safer, more efficient and less polluting vehicles.</li> <li>• Encourage and facilitate the uptake of new technology in a way that benefits both the community and the parties in the transport sector.</li> </ul>
<p><b>What technology or innovations could provide the greatest benefit to meeting the challenges identified for the Victorian freight system and what can government do to help with their adoption?</b></p>	<ul style="list-style-type: none"> <li>• The uptake of newer vehicles and combinations with more safety features, better fuel consumption, and lower emissions (i.e. HPEVs and LZEHV) should be encouraged. This can be done via direct financial incentives, or through access policy (e.g. expanded access at higher axle load limits, removal of curfews).</li> <li>• Telematics can be used as a tool to provide road managers with greater certainty on mass and route compliance. HVIA encourages DTP and road managers to carefully match telematics requirements with infrastructure management objectives, to achieve the necessary assurance to improve access, but minimise costs on industry.</li> </ul>

<p><b>Where should freight network investment be prioritised to deliver government action which can respond to the challenges identified?</b></p>	<ul style="list-style-type: none"> <li>• Improve and expand heavy vehicle access. Align the access for PBS vehicles with the corresponding access for prescriptive vehicles at the same level, as current disparities do not support productivity improvements.</li> <li>• Create end-end-to-end networks between key origin and destination points and other nodes such as commercial areas, intermodal areas and road train assembly/breakdown areas, to minimise the need to reconfigure vehicles on route. Ensure that roads within those areas are designed to accommodate high productivity vehicles.</li> <li>• Focus on upgrading access-limiting infrastructure and implement a risk-based approach wherever network deficiencies are identified. Consider a situation where a freight route contains a single low-standard bridge that limits mass along the entire route. A risk-based approach would involve implementing management strategies for the bridge such as condition monitoring and increased maintenance, such that an increase in mass for the route could be tolerated in the short-term, until the bridge is eventually upgraded to the correct standard.</li> <li>• Set aspirational standards for all road infrastructure that reflects the PBS standards for the various levels of vehicles. In the short term, those standards should consider the increases in dimensions and mass limits necessary to accommodate Euro VI vehicles, Safer Freight Vehicles (SFVs), and the current generation of LZEHVs. In the longer term, the standards should be aligned with the increased mass limits in Europe, which influence the design of European heavy vehicles, and next generation LZEHVs. The key segments of the network need to be assessed against those standards to identify weak points and priorities.</li> <li>• HVIA acknowledges that the existing network will not necessarily meet those standards. However, setting aspirations is an important part of the longer-term planning that is necessary for achieving functional end-to-end networks.</li> </ul>
<p><b>What is your business doing to prepare for this growth and what government actions could support this?</b></p>	<ul style="list-style-type: none"> <li>• HVIA's members are producing innovative vehicle designs that allow freight operators to carry more freight per vehicle, more safely, using less fuel and producing lower emissions. They are also including advanced safety features and telematics into vehicles to improve the efficiency of network operations.</li> <li>• Members' ability to do this is hampered by a convoluted processes for obtaining the required vehicle access approval process, costs relating to bridge assessments, a general shortage of skilled technical staff, and by rising costs for energy and materials used in building vehicles.</li> <li>• Removal of the bridge assessment fees and harmonisation/streamlining of networks across states are urgently required. Government actions to encourage young people to take up a career in the heavy vehicle industry and to assist them to acquire relevant skills is needed. Government actions to reduce energy costs and fight inflation are also welcome.</li> </ul>
<p><b>How can government facilitate greater sharing and visibility/use of information across supply chains?</b></p>	<ul style="list-style-type: none"> <li>• Greater sharing of data can be encouraged by providing improved access, and greater mass. This may be possible via reducing the margins used in infrastructure assessments. HVIA understands that those margins have historically been used to mitigate overloading risk. Greater certainty of mass compliance through data naturally reduces that risk.</li> </ul>

<p><b>Are there areas in which you are experiencing, or are expecting to experience skill shortages, or skills gaps related to new and emerging technologies?</b></p>	<ul style="list-style-type: none"> <li>• HVIA members continue to experience shortages in skilled technical staff, which impacts on truck and trailer manufacturing ability, and repair/servicing.</li> </ul>
<p><b>What role can the government play to help the industry to address skill shortages?</b></p>	<ul style="list-style-type: none"> <li>• Providing pathways for skilled migrants to enter the Australian industry is important in the short term, but encouraging Australian citizens and permanent residents to take on careers in the industry is equally as important for the long term.</li> </ul>
<p><b>What are the key day-to-day challenges you experience caused by inconsistencies in rules and regulations between jurisdictions?</b></p>	<ul style="list-style-type: none"> <li>• The bridge assessment fees charged in Victoria discourage industry from pursuing high productivity concepts.</li> <li>• Differences in heavy vehicle access policy and conditions between states (and within states) hinders progress and reduces operational efficiency.</li> <li>• Different requirements for the Authorised Vehicle Examiner (AVE) scheme in each jurisdiction complicate the assessment and certification of the modifications to heavy vehicles.</li> </ul>
<p><b>What forms of harmonisation could provide the greatest benefits to your supply chain?</b></p>	<ul style="list-style-type: none"> <li>• Harmonisation of heavy vehicle access policy and conditions (e.g. mass limits, dimensions, combinations). At present in the NHVR portal, there are access arrangements for 74 unique B-double variants, 228 Road Train variants, and 83 PBS vehicles. The proliferation of unique networks, many of which only apply in specific states, and with their own unique conditions, adds unnecessary complexity to the industry.</li> <li>• Networks must be harmonised and streamlined without diminishing access. Concessions and trade-offs leading to access at the 'lowest common denominator' is not an acceptable outcome.</li> <li>• DTP must also lead the alignment of local government networks with harmonised state-level access policy and conditions.</li> <li>• A national scheme for Authorised Vehicle Examiners (AVEs) would simplify the certification of heavy vehicle modifications.</li> </ul>