HEAVY VEHICLE INDUSTRY AUSTRALIA

HVIA Submission

On the NHVR's Draft Heavy Vehicle Productivity Plan 2024-2029

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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.

HVIA response to the NHVR's Draft Productivity Plan

HVIA is committed to working with the NHVR and road managers to improve heavy vehicle safety, productivity, and efficiency.

HVIA has made two recent submissions to the NHVR that cover some of the points of the draft productivity plan. Those are HVIA's response on the 'PBS 2.0' discussion paper (November 2022), and HVIA's response on 'Removing Roadblocks to Reform' (May 2024).

For brevity, HVIA will not repeat any of the points raised in those responses and is pleased to see that several themes and actions from those documents have been carried over into the current draft plan.

HVIA supports the stated priorities that place the focus on productivity and resilience, achieving zero deaths and serious injuries on roads by 2050, and reaching net zero emissions by 2050. Those priorities align with HVIA's key priorities and the wishes of the wider freight transport industry to improve productivity, safety, and sustainability.

HVIA also broadly supports most of the 20-plus listed actions in the plan, but notes that only limited detail is provided on the execution of those actions. HVIA offers to provide further feedback on the NHVR's proposals in any of the action areas, should they be made available.

In the absence of that detail, HVIA would like to highlight the following high-level topics and calls on the NHVR to consider these in its application of the plan's actions.

Certainty of access and national harmonisation – The plan mentions the development of the National Automated Access System (NAAS), and HVIA is aware that several state road managers have already committed to implementing the system. HVIA consider it crucial that:

- the chosen system must be truly national, and accepted by all state jurisdictions equally
- access decisions made by the system must be accepted by road managers without any derogation or review.

Reducing the permit burden – HVIA prefers that regulators use notices rather than permits for granting access, but highlights the crucial importance of:

- maximising productivity in setting notice conditions
- the limitations of the current arrangements for road manager access consent.

Notice conditions must not result in 'watered down' versions of high productivity vehicles, which ultimately lack utility and will prevent industry from using the notices, pushing them instead towards more expensive and complex access options such as Performance Based Standards.

As long as access remains a road manager decision, the degree to which notices, templates, or any other high-level access instrument can achieve productivity improvements will be limited by some degree. At the state level, access arrangements for identical vehicles still differ substantially. At the local level, councils continue to simply 'opt out' of providing access to certain networks for specific vehicles, resulting in a 'patchwork' network map within state borders.

Expanding access and network development – HVIA supports identifying end-to-end networks for high productivity vehicles connecting key points of freight origin and destination, such as industrial areas, ports, intermodal terminals and roadtrain assembly/breakdown areas. This must include networks that comprise those areas (such as roads within industrial areas), and crucially, must also consider national routes, and seek to harmonise networks with other states. State borders cannot be considered the 'end' of any network.

HVIA would also like to see the adoption of aspirational standards for road design which enhance the capacity of the road system to support 'high productivity' freight vehicles (such as longer and heavier PBS vehicles) and also vehicles with advanced safety features and low/zero emission technologies. This will need to include intersection geometry, standards for bridges and level crossings and pavement strength. These aspirational standards should be used to design and build network enhancements. NHVR has a role to play in developing these standards in partnership with Austroads and the road managers.

Low and zero emissions vehicles – HVIA strongly supports the NHVR's work with its stakeholders to progressively relax allowable masses and dimensions for Low and Zero Emissions Heavy Vehicles (LZEHVs). HVIA supports the call for '*an extensive and permanent higher axle load network that transcends borders and consistent access conditions'*. HVIA notes the current state-based arrangements for LZEHVs differ in their applicability, conditions, and mass limits, which hinders the transitions to LZEHVs.

While HVIA understands that the provision of incentives to industry to drive the take-up of LZEHVs is largely outside of the NHVR's remit, it encourages the NHVR to consider removal of operational fees (e.g. permit fees) associated with such vehicles. A similar proposal could be applied to the vehicle fleet more broadly with the goal of driving down the average age of the fleet, and encourage the uptake of safer, more efficient vehicles.

HVIA notes the stated action to *'Develop an approach to enable internal combustion engine vehicles to be retrofitted and become electric vehicles.*' HVIA agrees that some guidance on LZEHV vehicle modifications is required, in keeping with the NHVR's historical approach to regulating heavy vehicle modifications via Vehicle Standards Bulletin 6. However, the high complexity of powertrain conversions cannot be underestimated, and in some instances, may not be technically feasible. HVIA offers its assistance in providing expertise through its member organisations and strongly encourages the NHVR to engage early with the industry in the development of such guidelines.

HVIA also notes that the plan attributed 38% of total transport emissions to heavy vehicles. HVIA is aware of some publications that state lower figures (i.e. around 24%), such as the 'Sector Pathways Review – Transport' from Australia's Climate Change Authority (CCA)[1]. Discrepancies may be due to how publications classify 'heavy vehicles', and HVIA encourages the NHVR to ensure that the figures it uses are aligned to its regulatory focus.

Building the social license of heavy vehicles – HVIA strongly agrees with the assertion that '*modern and more productive vehicles are safer for communities and better for the environment, but this concept is yet*

[1] 2024SectorPathwaysReviewTransport.pdf

to be widely understood and accepted'. To that end, HVIA agrees with the suggestions to continue to train and educate stakeholders, and offers its assistance in those efforts.