

6 June 2025

Productivity Commission
4 National Circuit
Barton ACT 2600, Australia
VIA WEBSITE SUBMISSION

RE: Productivity Commission Inquiries 2025 – Five Productivity Pillars

To Whom It May Concern,

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 welcomes the opportunity to provide submissions on the 'Productivity Pillars', four of which are relevant to the interests of HVIA and its members. To that end, we have submitted detailed responses to the relevant Pillars via the Productivity Commission website, and would like to take the opportunity to present a collated summary of our feedback across Pillars 1, 2, 3 and 5 below.

Pillar 1 – Creating a more dynamic and resilient economy

HVIA response – reduce the impact of regulation on business dynamism, by:

- reducing delays in obtaining Vehicle Type approvals
- update/modernise the Performance Based Standards (PBS) regulatory scheme
- harmonise Approved Vehicle Examiner (AVE) requirements across the country
- improve access for High Productivity Vehicles (HPVs), including harmonisation of state-based regulations
- resolve legislative issues to allow for powered trailers and other innovative heavy vehicles to be trialled and operated
- revise and update the Australian Design Rules (ADR) review and development processes, and complete the Harmonisation review of the ADRs themselves

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Pillar 2 – Building a skilled and adaptable workforce

HVIA response – improve credit transfer and prior learning mechanisms by:

- developing a nationally standardised Recognition of Prior Learning (RPL) framework, with common evidence requirements and shared assessment criteria
- establish centralised digital tracking of credentials and credits, such as a national digital skills passport, to assist workers in carrying recognised experience across qualifications and providers
- create industry-endorsed skills verification mechanisms, allowing for practical, experience-based assessment outside the confines of Registered Training Organisations (RTOs)
- align funding mechanisms to properly support RPL assessments, making them financially sustainable and attractive to providers.

HVIA response – focus on worker-related training and licensing through:

- better partnerships between the Vocational Education Training (VET) system and industry
- recognition of micro credentials and manufacturer/supplier training through a national framework
- nationally consistent risk based licensing and regulatory frameworks that recognise the global nature of business and also provide clear pathways for workers to obtain licencing and recognition

Pillar 3 – Harnessing data and digital technology

HVIA response – support safe data access and handling through an outcomes approach to privacy issues, and correct use of consumer data through:

- careful consideration of the rights of businesses, particularly when data was collected under a legislative or administrative requirement
- ensuring that voluntary participation in government data projects and initiatives is not negatively impacted by new regulations

HVIA response – enable AI's productivity potential, through:

- sensible implementation of regulatory controls on AI that do not unreasonably limit its utility in industry
- careful implementation and due diligence of new AI technologies in government decision making to ensure sensible and consistent outcomes
- ensuring that the decisions made based on AI accurately reflect government policy and that suitable appeal and review mechanisms are in place for all these decisions

Pillar 5 - Investing in cheaper, cleaner energy and the net zero transformation

HVIA response – reduce the cost of meeting carbon targets, including:

- encouraging the coordination of effort towards net zero across industry, all levels of government, and relevant stakeholders, leading to consistent policy and investment decisions
- addressing the barriers to adoption, including up-front costs, lack of infrastructure vehicle access restrictions, and payload penalty
- recognise and encouraging the short-term emissions benefits of upgrading the existing fleet using modern fuel-efficient vehicles.

Thank you for the opportunity to engage with the Productivity Commission on this review. Please contact me to discuss any points relevant to HVIA's submission at a.lausberg@hvia.asn.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Adele', written in a cursive style.

DR ADELE LAUSBERG
CHIEF ADVOCACY OFFICER

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