



## HVIA Submission

To the NHVR's Directional  
Stability Under Braking (DSUB)  
industry consultation paper

**September 2025**

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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# What is Heavy Vehicle Industry Australia?

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.

## Background

A significant number of HVIA members are involved in the design, assessment, certification and manufacture of Performance Based Standards (PBS) vehicles. As such, HVIA is committed to working with the National Heavy Vehicle Regulator (NHVR) and road managers to improve the PBS scheme as a mechanism for promoting the uptake of safer high productivity vehicles.

HVIA has always supported calls for improvements to the Directional Stability Under Braking (DSUB) standard and has continually advocated that PBS vehicles should be fitted with the highest level of safety technology available in the market. HVIA has previously worked with its members to provide formal responses to the NHVR on DSUB updates in 2021, and 2023, and again welcomes the opportunity to do so in 2025.

HVIA acknowledges the consultation efforts undertaken by the NHVR with industry prior to the release of the paper and will refrain from repeating topics already covered under previous consultations.

## HVIA's response to the DSUB industry consultation paper

Overall, HVIA supports the NHVR's proposal as outlined in the consultation paper, with relatively few exceptions on technical matters. However, HVIA expects there to be some difficulties and confusion within industry during the implementation of the changes, due to the complexity of the arrangements for managing existing PBS combinations.

In preparing this response, HVIA held a member webinar to present the key aspects of the NHVR's proposal and obtain member views. Several technical concerns were raised, separate but somewhat related to the fourteen specific questions posed by the paper, which were explored at length with members. Those technical concerns, and HVIA's response to each of the fourteen specific questions follows.

### **Limitations of the ISO communications standard and impacts on ABS/EBS braking technologies**

HVIA supports the proposed mandate on ABS/EBS and electronic control signals to all units in PBS combinations but notes limitations of the ISO 11992 standard that sets requirements on the interchange of digital information on electrical connections between towing and towed vehicles.

Those limitations mean that braking system communication capability may not be guaranteed for combinations with more than five ABS/EBS control units. HVIA understands that communication capability can vary between brake system suppliers, and that some innovative solutions are available.

HVIA acknowledges that the number of heavy vehicle combinations featuring more than five trailing units and that may seek to operate in the NHVR's PBS scheme is low. Those combinations, which typically include two A-trailers and a B-double trailer set, such as an AAB-quad, or a BAA-quad, are more prevalent in Western Australia than in Heavy Vehicle National Law (HVNL) signatory states, which is where the NHVR's PBS scheme applies.

Notwithstanding, HVIA recommends that the limitations of the ISO standard be acknowledged by the NHVR, and alternative compliance pathways be offered should a compliant braking system be unavailable, or infeasible to fit.

One option for an alternative pathway is to prioritise ABS/EBS fitment to the *trailers* of combinations with more than five units and omit fitment to one of the *dollies*. HVIA understands that such an approach is in line with that adopted by West Australian regulators, who do not mandate fitment of ABS/EBS systems to dollies in longer combinations. It is also the current approach of Australian Design Rule 38/05.

A risk assessment could be conducted to guide a decision on which of the subject combination's dollies could reasonably have its ABS/EBS unit safely omitted.

Such a risk assessment could consider which (if any) of the dollies feature hinged drawbars, and/or roll-coupled front connections. HVIA understands that varying brake system installation/specifications options are available for differently designed dollies. Fitment of a rigid drawbar (or not), and roll-coupled front coupling (or not) could influence a decision on the specification of the system fitted, and by extension, whether the dolly is a candidate for fitment, should a choice on fitment between dollies in a combination be necessary.

### **Brake system status indicators**

The consultation paper includes the requirement for trailing units to be fitted with an '*appropriate means of indicating the status of the brake system*', and lists requirements for those status indicators, including that if they feature a lamp, it must be compliant with applicable national regulations and ADRs.

HVIA has previously raised concerns regarding the explicit requirement for those systems to comply with the ADRs, on the basis that the ADRs (namely, ADR 13/00 and ADR 45/01) do not presently provide a clear regulatory pathway for status indicators.

HVIA understands and appreciates the NHVR's previous feedback that the PBS scheme does not presently allow exemptions from those ADRs. Nonetheless, HVIA repeats the call for the NHVR to retain the requirement for status indicators, but remove the ADR compliance condition, in recognition of the current, on-going work between industry stakeholders and the Federal Department that oversees the ADR package that seeks to formalise the regulatory pathway for status lights.

Adding the requirement for ADR compliance of status lights to the DSUB standard now, while the ADR compliance pathway is being investigated and finalised will add confusion and deliver no tangible benefit in any safety area.

## Responses to the discussion paper's questions

No.	NHVR question	HVIA response
1	<p><b>Connector and system voltage for Hauling Units in PBS Combinations:</b></p> <p>Since the implementation of ADR 35/06 it has been a requirement that:</p> <p><i>“Each vehicle designed to be used in ‘Road Train’ combinations, must be equipped with a special connector conforming to ISO 7638-1:2003 together with a permanent electrical supply system configured for 24-volt operation”.</i></p> <p>Do you have any feedback on whether this should be considered a requirement for all hauling units used in PBS combinations? Note the existing “Vehicle Combinations” requirements above relating to wiring, voltage and functionality.</p>	<p>No feedback at this stage.</p>
2	<p><b>Braking System Fault Identification:</b></p> <p>For the trailing unit requirement to provide a means of indicating the status of the braking system, do you think it is important to identify the specific unit causing a fault? Do you believe this should be a requirement, and how might it be implemented?</p>	<p>Many of the trailer-based status systems available in the market will identify the specific unit causing the fault, as they are fitted to the trailer.</p> <p>Notwithstanding, it need not be considered a requirement at this stage, unless there is safety or operational data that indicates otherwise.</p>
3	<p><b>Other Feedback:</b></p> <p>Do you have any other general feedback on the revised DSUB standard proposal?</p>	<p>See comments in the previous sections above the table.</p>
4	<p><b>Is 3 months a sufficient notice period before the commencement of the transition period for the new standard?</b></p>	<p>The period appears to be workable. HVIA strongly encourages the NHVR to provide as much notice and information as possible to impacted industry stakeholders and operators, to facilitate a smooth transition.</p>
5	<p><b>Are there any substantive barriers to an 18-month transition period?</b></p>	<p>There do not appear to be any substantive barriers, but HVIA holds concerns regarding the capacity of NHVR resources to respond to the number of PBS variation/approval requests that may arise.</p> <p>HVIA also warns of a potential ‘rush’ of approvals or requests towards the end of the transition period and encourages the NHVR to publicise the changes widely and often.</p> <p>HVIA also anticipates some difficulties and confusion within industry operators during the</p>

		<p>implementation, due to the complexity of the arrangements for managing existing PBS combinations.</p> <p>Those difficulties may be exacerbated by the need to identify the level of braking systems fitted to trucks and trailers, and which version of the relevant ADRs they comply with.</p> <p>To that end, HVIA strongly encourages the NHVR to provide as much notice and information as possible to impacted industry stakeholders and operators, to facilitate a smooth transition.</p>
6	<b>Do you have any feedback on the DSUB compliance requirements during the Transition Period (1 January 2026– 30 June 2027)?</b>	No further feedback at this stage.
7	<b>Do you have any feedback on the DSUB compliance requirements after the Effective Date (1 July 2027)?</b>	No further feedback at this stage.
8	<b>Do you have any feedback on the proposed grandfathering provisions?</b>	<p>The grandfathering provisions are complicated and need a more readily understood explanation than is provided in the discussion paper. HVIA strongly encourages the NHVR to do so, as it is feared that the task of explaining the policy may unfairly fall on HVIA members and other industry stakeholders.</p> <p>HVIA is happy to work with the NHVR to develop clearer guidance for industry.</p>
9	<b>Are there any specific VA modifications that you think should be added to the list of minor modifications that can be made without being impacted by the revised DSUB standard?</b>	No further feedback at this stage.
10	<b>Are there any aspects of upgrading vehicles with new braking technology that you think the NHVR needs to consider?</b>	<p>The task of upgrading trailers and dollies is likely to be simpler and less expensive than upgrading hauling units. In many cases upgrading the hauling units may be technically infeasible, or prohibitively expensive.</p> <p>This may cause problems for VA holders seeking to upgrade a trailer set for use with an existing hauling unit, or in the case that a trailer set becomes damaged and must be completely replaced with new units.</p> <p>The proposed rules may make this impractical and may effectively leave existing PBS hauling units ‘stranded’ in existing VAs.</p>

<b>11</b>	<b>Do you have any feedback on the proposed process for providing proof of compliance for upgraded vehicles?</b>	No further feedback at this stage.
<b>12</b>	<b>Do you foresee any issues with the proposed method of recording compliance with the revised DSUB standard for PBS certifications?</b>	No.
<b>13</b>	<b>Do you foresee any issues with the proposed method of labelling displayed on PBS Vehicle Approvals?</b>	No.
<b>14</b>	<b>Do you have any feedback on the proposed process for PBS assessments during the Transition Period?</b>	HVIA would like to see the IPAC mentioned in Section 11 to ensure the guidance material is completely clear.