

5 September 2025

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

**RE: National Competition Policy analysis 2025 – interim report response**

To Whom It May Concern,

Heavy Vehicle Industry Australia (HVIA), the peak industry association for Australian manufacturers of trucks and trailers (collectively referred to as heavy vehicles), recently provided a response to the National Competition Policy analysis review in June of this year.

HVIA welcomes the opportunity to provide a further response to the interim report, as follows.

**Interim recommendation 1**

HVIA acknowledges and agrees with the interim report's findings regarding a lack of international harmonisation, including for unique Australian standards where there is no clear international equivalent. HVIA notes however, that some deviation may be necessary to ensure that the uniqueness of the Australian heavy vehicle industry remains protected, as well as its on-going innovation.

Australia's local size and weight regulations for heavy vehicles allow globally unique combinations, which means that our local regulations and standards must occasionally differ from their international equivalents. Separately, the adoption of international regulations or standards may not be prudent, nor deemed required for the Australian market.

Prior member consultations conducted by HVIA identified several instances where harmonisation has not worked, or where partial harmonisation has caused problems. Member feedback identified a range of situations that generally fall into one of the following types:

- Situations where international standards/regulations are not suitable for Australian conditions or vehicles (particularly where longer vehicles such as road trains are involved, as they are unique to Australia).
- Situations where local standards/regulations have closely followed their international equivalents but have slightly different requirements that place an unnecessary additional regulatory burden.
- Situations where harmonisation or potential harmonisation has resulted in inconsistencies between individual standards/regulations.

As a result, in some instances it is in Australia's best interests to deviate from international standards and regulations, despite the overarching general need to harmonise where possible and sensible.

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*HVIA offers to work with the Commission to review any specific standards relevant to the heavy vehicle industry identified through its analysis.*

HVIA acknowledges and agrees with the findings regarding the lack of consistency in application across jurisdictions, and the need to update laws to reference current versions of standards. HVIA agrees with the proposed interim recommendations to address those points.

Separately, HVIA made a submission to the Federal Government's ADR Harmonisation Review consultation in January this year. In it, HVIA identified five key improvements to Departmental processes to benefit the Australian Design Rule (ADR) program and harmonisation efforts. Those improvements related specifically to the operation of the Vehicle Standards Consultative Forum (VSCF), chaired by the Department of Infrastructure, and included:

- double the frequency of the VSCF meetings to four per year
- prioritise the regulatory issues raised to guide the subsequent chosen reform areas
- introduce measurable targets for specific work packages and deliverables
- increase the number of Department staff focussed on the ADR program
- publicise the reasons for regulatory decisions following industry submissions.

The above five improvements, when implemented, will deliver the necessary ADR reforms, and allow that reform work to keep pace with the rate of industry and technology development.

### **Interim recommendation 3**

Our sector is not immune from problems laid out in the interim report and understands that occupational entry regulations – particularly those related to repair, servicing, and technical maintenance – are fragmented in Australia.

The absence of consistency across states and territories has created a complex landscape that directly affects service availability, workforce mobility, and investment in skills development.

*HVIA welcomes efforts to improve the present situation, but caution against moves to increase licencing or certification requirements without properly consulting with industry.*

HVIA will provide further details to the Productivity Commission's separate *Building a skilled and adaptable workforce interim report*.

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.

Yours sincerely,



Adam Ritzinger  
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