



HVIA SUBMISSION TO THE NHVR'S PHLS REVIEW

September 2026

Who 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

Dozens of HVIA members are involved in the design, manufacture, assessment, and certification 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 and more efficient high productivity vehicles.

HVIA has long called for the transition of the scheme's standards from prescriptive to performance-based and accordingly supports the NHVR's efforts to update the Pavement Horizontal Loading Standard (PHLS) to remove its prescriptive requirements.

HVIA's response to the PHLS

Overall, HVIA supports the NHVR's proposal as outlined in the consultation paper, however there are several items that the paper is silent on, which HVIA believes deserve consideration and clarification.

In preparing this response, HVIA held a member webinar to present the key aspects of the NHVR's proposal and obtain member views. A range of technical, operational, and compliance matters were raised, which are explained below.

Removal of access roadblocks

HVIA understands there are many networks across Australia that are not open to heavy vehicle combinations, due to those combinations seeking to be exempted from the current PHLS's prescriptive weight limits.

It is HVIA's expectation that as the proposed PHLS changes will eliminate the need for any vehicle combination to be exempted, those networks will subsequently be available to all PBS combinations assessed under the new PHLS.

HVIA calls for the NHVR to confirm that outcome will be delivered under the new PHLS, prior to finalising changes to the standard and announcing a commencement date.

‘Cold’ tyre inflation pressures

The paper defines requirements for maximum cold tyre inflation pressures but does not define any measurement parameters relating to those pressures. This is important, because pressure and temperature are linked.

HVIA calls on the NHVR to consider the effects of that relationship and comment on it in the standard. Specifically, does the ‘cold inflation pressure’ mean the gauge pressure for a tyre not heated through operation, or does it mean a pressure that is normalised to a prescribed reference temperature?

Scope of application of tyre pressure controls

The paper does not specify whether cold tyre inflation pressure controls are required at every tyre, axle, or only the tyre(s)/axle(s) that exceed the shear stress limits in the simulation. HVIA understands the NHVR is open to industry views.

Tyre Pressure Monitoring Systems (TPMS) and Central Tyre Inflation Systems (CTIS) deliver operational savings and environmental benefits, and in recognition of that are mandated in other markets, including the European Union under UN ECE Regulation No. 141. That regulation covers heavy vehicles and trailers and applied to all vehicles in the European Union from July 2024.

HVIA considers it sensible to increase the use of tyre pressure monitoring and inflation systems in Australia. HVIA therefore encourages the NHVR to apply the requirement to every tyre on every axle, for any vehicle unit with a tyre/axle that exceeds the maximum shear stress, with the exception of the steer axle as it is omitted from the assessment.

Furthermore, HVIA encourages the NHVR to remove the option to address cold tyre inflation pressure requirements through an inflation procedure. HVIA believes that the PBS scheme should encourage ‘best in breed’ vehicles and organisational practices, and promote the use of technology to lift vehicle safety and productivity. Implementing a manual, labour-based procedure instead of an automated technology solution is counter to those outcomes.

Operating conditions imposed on affected vehicles

HVIA members raised the need for flexibility in tyre pressure settings for tyres in different positions, which the paper is silent on. HVIA believes the operating conditions should allow flexibility in setting different cold tyre inflation pressures for different tyres/axles on a vehicle.

System capability/function requirements

HVIA members raised several items in relation to system capability and function that the paper is silent on. Those items and HVIA’s recommendations follow.

- **Minimum system capability levels** – the paper does not specify any system capability requirements such as sensor accuracy/tolerance, latency, resolution, system calibration, and alarm method. HVIA’s preference is for those specifications to remain out of the standard, as they are best managed by the providers of the technology.
- **System warning/notification method** – the paper is silent on how systems should deliver alarms, notifications, and warnings. HVIA’s preference is for those specifications to remain out of the standard, as many reliable methods are possible, and will likely vary due to the preference of the vehicle’s operator.
- **Pressure setting protection** – the paper is silent on whether any protections are required against unauthorised access to system pressure settings. HVIA’s preference is for that requirement to remain out of the standard, as it is best managed by the providers of the technology.

Compliance matters for affected vehicles

HVIA members raised several items in relation to compliance matters, which the paper is silent on. Those items, and HVIA's recommendations follow.

- **Evidence of compliance during roadside inspections** – HVIA believes that a driver explaining the basic function of the system fitted to the vehicle should be regarded as sufficient for demonstrating compliance with a cold inflation pressure operating condition during a roadside inspection. The roadside inspector should not need to interact with the system, nor be able to view its settings, other than to confirm it is operational at the time of the inspection.
- **System faults** – The paper is silent on how system faults such as damaged sensors should be managed. HVIA's preference is for those specifications to remain out of the standard, as they are best managed by the providers of the technology. Separately, HVIA calls on the NHVR to clarify how system faults observed during roadside inspections should be treated.
- **Record keeping** – In the case of TPMS and CTIS, the paper is silent on record keeping requirements, or evidence related to the pressure settings or system checks. HVIA believes that the standard should not dictate record-keeping requirements, as they differ across the industry and technology.

Requirements for consistency in simulations

The paper is silent on whether the minimum cold inflation pressures defined under the new PHLS standard are required to be utilised across the other PBS standards. HVIA calls on the NHVR to clarify whether the use of different pressures in simulations of different standards is permitted.

Creation of situations necessitating pressure monitoring

HVIA understands that there may be some specific cases where the combination of tyre size and axle load automatically necessitates pressure monitoring, should the manufacturer's recommended cold tyre inflation pressure be lower than the minimum values specified in the standard.

One example is the low profile 275/70 R 22.5 tyre, which can have a recommended cold inflation pressure range of approximately 585 kPa (85 psi) to 827 kPa (120 psi).

HVIA calls on the NHVR to consider those cases and where necessary, update the standard to include a list of tyre sizes and loads that may necessitate pressure monitoring by default.

Creation of 'orphaned' Design Approvals

HVIA understands the NHVR intends to allow vehicles from existing Design Approvals to be built and approved, without needing to be re-assessed to the new standard, and supports that approach.

Notwithstanding, HVIA understands that a change to a Design Approval (even if minor in nature), will trigger re-assessment of the vehicle to the new PHLS standard, which could result in vehicles built to new standard having different operating conditions or requirements than the ones which preceded it.

HVIA again encourages the NHVR to consider impacts on the existing fleet when requiring re-assessment of older Design Approvals.



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