16 November 2026

John Marcolina
Austroads Project Team SRL6505 (Deloitte)
VIA EMAIL

Re: Feedback on required updates to Written off Vehicles (WOVR) National Assessment Criteria

Dear John,

I am writing on behalf of Heavy Vehicle Industry Australia (HVIA) and our members to provide feedback on Project SRL6505 and the WOVR National Assessment Criteria from a heavy vehicle perspective.

Our consultation with members found one overriding issue: most states and territories **do not** have an effective or explicit heavy vehicle WOVR. Given its safety-critical impact, and the low cost of reform, we have limited our feedback to this single high-impact issue. It has been raised for more than a decade. With the road toll proving stubborn to reduce, known safety gaps like this must be closed now.

HVIA asks that Project SRL6505 **recommend a nationally consistent heavy vehicle WOVR in every state and territory by 2029, adopting the NSW model. We acknowledge that SA and NT have also adopted but the NSW model is best in class. We will also adopt the term WOHVR – Written off Heavy Vehicle Register to assist with the clarity and understanding of this request.**

Specifically, we ask that:

- every state and territory introduces a heavy vehicle WOHVR based on the NSW scheme and the Austroads heavy vehicle damage criteria;
- these schemes are nationally consistent, with one set of criteria and a shared digital register that tracks trucks by VIN, coordinated by Austroads and delivered by 2029; and
- a repairable write-off returns to the road only after repair by a licensed repairer, with a full record of the work and parts.

Our reasons are as follows:

- Unsafe trucks are going back on the road. Outside NSW, anyone can buy a written-off truck at auction, repair it with no licence or experience, and register it with a roadworthy certificate. Most serious damage is hidden in the chassis, steering and wheel bearings, and fatal crashes linked to poorly repaired trucks are what drove NSW to act.
- A patchwork does not work for vehicles that cross borders every day. Only NSW has an effective heavy vehicle scheme, so a truck written off in one state can be repaired without oversight in another and re-registered.
- Car rules do not fit trucks. Cars are built to be sacrificial in a crash; trucks are built to be repaired. Light vehicle criteria either scrap repairable trucks or miss dangerous ones.
- The solution already exists. The NSW scheme works, and industry regards it as better than the light vehicle system. Adopting it nationally needs commitment, not new design.

Supporting information is in Appendix A.

Yours sincerely,

RACHEL MICHAUD
CHIEF ENGINEER

Appendix A: Supporting information

Table 1: National Heavy Vehicle WOHVR overview

Jurisdiction	Heavy vehicle WOHVR today
NSW, ACT	Heavy vehicle scheme in place (the ACT follows the NSW scheme); works well, better than the light vehicle system
SA	Heavy vehicle WOHVR, but has some complexities around matching paper-based details to online documents
QLD	Heavy trailers only; a full scheme was considered and then parked
NT	Loosely applied, using light vehicle criteria.
VIC	None; two proposals, the latest in January 2025, supported by VACC
WA	Applies local write-off notification criteria to light vehicles
TAS	Rules align with the national framework, covering light motor vehicles and trailers up to 4.5 tonnes limit

Case examples (de-identified)

- A late-model truck was sold at auction as "fleet downsizing". It had in fact been crash-repaired, and the chassis was too twisted to fit a body.
- A truck stripped for repair was found to have components glued, not welded. It would have come apart in a crash.
- A truck with a destroyed cab was cash-settled and poorly repaired. It crashed again in the same place with worse damage, because it was no longer structurally sound.
- After a minor crash, a steering box that looked undamaged showed brinelling on the worm shaft bearings. A seized steering box at highway speed can cause a major crash.

The scale of the risk

- Industry estimates that around 80% of trucks in a major incident have a bent chassis.
- Hidden damage commonly affects chassis rails, steering boxes, turntables and wheel bearings, none of which a visual roadworthy inspection reliably finds.
- Short-haul and urban trucks are inspected less often than long-haul fleets, so poor repairs can go unnoticed for longer.

Key features of the NSW model

- Developed with Austroads and the Insurance Council of Australia, after fatal crashes involving poorly repaired trucks.
- Heavy vehicle damage criteria, separate from light vehicle criteria, that distinguish statutory from repairable write-offs.
- Repairable write-offs return to the road only through a licensed repairer.
- A repair record, including the insurance quote and a list of parts fitted.

Features in the NSW which could be improved

- Austroads Criteria: As modern and future fleets adopt new fuel type technology, that technology should be properly accommodated in any revision of the damage criteria, in particular fuel cells.
- Currently light trucks that fall into the 3.5t to 4.5t range use the Heavy Vehicle Damage criteria, however, are automatically Statutory Write Offs due to their weight and the way the legislation is worded. Many light trucks with age have a low market value and can be given Statutory Write Off status regardless of minor damage causing the total loss.

Anticipated concerns

- **Salvage values.** Insurers may expect salvage values to fall if fewer buyers can repair trucks. The NSW model keeps a repairable category, so viable repairs continue through accredited repairers rather than ending.
- **Implementation time.** A digital national system could take around 18 months to finalise, so work needs to start now to meet 2029.