



HEAVY VEHICLE
INDUSTRY AUSTRALIA



HVIA Policy

Truck / Trailer Width

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Heavy Vehicle Industry Australia
Represents and advances the interests of manufacturers
and suppliers of heavy vehicles and their components,
equipment and technology.



www.hvia.asn.au



hvia@hvia.asn.au



07 3376 6266

1) Background

Over the last 12 months the recommendations of the National Road Safety Strategy Action Plan's (2018-20) Critical Action to 'Investigate the introduction of safer, cleaner vehicles by minimising regulatory barriers' and Austroads Project NEF6116: *Exploration of Heavy Freight Vehicle Dimensions: Productivity Safety and Other Considerations* have received considerable attention.

Underpinning these projects is the idea promoted by some sections of the transport industry that vehicle width and vehicle steer axle mass are constraining the uptake of advanced safety features on heavy trucks.

The central argument is that because Australia is a small proportion of the world market for trucks, the engineering of these vehicles tends to be focussed on the requirements of the European and American markets. Both America and Europe have higher allowances for vehicle width and steer axle mass. The argument has been that the re-engineering of trucks to meet the Australian requirements is a cost to industry and results in a delay to the introduction of advanced safety features in Australia.

The Austroads report is likely to be completed in October 2019 after which changes to vehicle width will be considered by Government.

2) Is There a Case for Change?

Within the heavy vehicle industry there is a significant divergence of views on possible changes to vehicle width.

Truck manufacturers generally favour a change to the regulations to allow wider vehicles as it would reduce the cost and regulatory barriers of entry for internationally designed or manufactured trucks. Truck manufacturers also highlight the increased ability to fit safety features and to transition to Euro 6 engine emissions standards if width was to increase.

Component suppliers, such as axle suppliers and brake manufacturers, generally appear to be neutral on the issue. Most have global operations that cater for the North American and European markets so will be able to adapt to the change. In some cases, however, there may be a need to assist Australian manufacturers to transition.

It must be noted that there are specialised component suppliers, such as some of the crane manufacturers, which are strongly in favour of the change.

Australian trailer manufacturers have a variety of views depending on which segment of the market they operate in. The productivity and safety benefits are likely to be low for most segments of the trailer industry (for example tippers). Additional international competition from low wage and low-cost countries, places the Australian manufacturing industry at a disadvantage. There may, however, be trailer segments where the safety and productivity benefit are quite sound.

3) Timeframe and Broader Government Considerations

At the Strategic Vehicle Safety and Environment Group (SVSEG) meeting in June 2019 the Department of Infrastructure, Transport, Cities and Regional Development “The Department” outlined a potential timeline for consideration of these issues subject to the outcomes of the Austroads report, agreement by Government and the normal Regulatory Impact Statement (RIS) requirements.

The approach outlined by the Department is broadly as follows:

- In 2019 minor changes to the Australian Design Rules (ADRs) would be made to allow advanced vision systems compliant with UN Standard R46 to be excluded from width calculations, and ADR43 would be amended to allow changes to axle spacing, transitional mass and rear overhang requirements to be aligned with European equivalents.
- In 2020, subject to a RIS, vehicle width for NC vehicles (Trucks) would be aligned to UN standards (2.55m) provided there is improved safety performance. It is proposed vehicles wider than the existing width requirements would be required to comply with additional ADR requirements including:
 - An ADR requiring them to be fitted with a Lane Departure Warning System (LDWS) in line with UN R130;
 - An ADR requiring them to be fitted with more sophisticated vision systems in line with UN R46 but providing allowance for local variations for US and longer combinations;
 - An ADR requiring them to comply with side underrun protection barriers in line with UN R73.

Also, in 2020, SVSEG has suggested that States and Territories should consider changes to axle mass limits for vehicles meeting Euro 6 emission standards.

In 2022 the case for changes to width allowances for refrigerated bodywork, and trailers would be considered along with the case for changes to align with the US standards for width. It is also proposed that the requirements for LDWS and vision systems would become mandatory for all vehicles and ADR 43 would be amended to require audible/visible warning alarms. The case for turning alarms and Blinds Spot Detection Systems (BSDS) would be considered at this time.

4) HVIA Policy Principles

HVIA believes that any changes to the regulation must apply a “no disadvantage” test for Australian industry.

HVIA members are likely to be affected by a change in width in different ways and have a variety of views on this issue.

HVIA believes that any RIS looking at this issue should evaluate the impacts of the proposed change on a market segment by market segment basis. Evaluation of the results of the RIS should be based on a set of basic principles, outlined as follows:

- Where the industry segment is likely to achieve productivity, improved safety impacts, or experience reduced regulatory costs which exceed the potential negative impacts on local industry (including job losses to local manufacturing) HVIA would likely support the change.

- Where the inclusion of safety features is the rationale for the change to width the inclusion of the safety features should be mandated for vehicles taking advantage of the additional width.
- If the RIS identifies only marginal improvement or in fact identifies risks to Australian manufacturers considering a range of economic, safety, social or competition issues, HVIA recommends that prior to implementing any changes for these segments, the Government would need to put in place a transition plan to:
 - a) demonstrably eliminate these risks; or
 - b) include Government assistance to re-tool or assist with other transitional costs.

These principles are examined below in greater detail for each segment.

4.1) Trucks

HVIA accepts that there is likely to be a case for increasing the width of trucks to 2.55m in order to improve the uptake of safety features. However, HVIA is also of the view that any increases in width should be considered in conjunction with increased steer axle masses. Moving to Euro 6 will generally require fitting of additional emissions control equipment to the engine. If steer axle masses are not increased, the potential safety and environmental benefits may not materialise by increasing width alone. This is because the permitted maximum steer axle mass will continue to restrict the addition of emissions control and safety equipment to the vehicle.

Increasing the widths of trucks to 2.55m should only be approved in conjunction with a set of safety and environmental features which demonstrate a positive cost benefit to the community. A RIS should evaluate whether the possible changes outlined by the Department would meet this test.

HVIA is of the view that the productivity benefits of increasing the width of truck bodies are generally very small, but this is likely to be outweighed if the safety improvements and the environmental / social benefits which would be realized by moving to Euro 6 or alternatively fuelled engines and by the reduced costs of re-engineering international designs for the Australian market.

HVIA awaits the results of the RIS but notes cautious support based on our industry knowledge.

4.2) Truck Mounted Cranes

HVIA also believes that there is a case for allowing truck mounted cranes to have the additional width to allow the fitment of safety features.

4.3) Trailers

HVIA has asked its trailer manufacturing members for their current view about increased trailer width and notes there are a wide range of views on this issue. This is due to the diversity of the trailer market in Australia and is complicated by the fact that the performance characteristics of combination vehicles are more complex than rigid trucks and require careful consideration.

The current prevailing view is that current width limits do not act as an impediment to the adoption of advanced safety options for trailers in Australia. It is also true that most heavy combination vehicles

are mass constrained, meaning the additional width of the trailers will not provide the productivity benefits to outweigh the implementation costs to industry and the safety risks to the community.

Many combination vehicles do not have general access to the road system due to their performance characteristics. The willingness of road managers to provide access to wider combination vehicles needs to be considered in the analysis.

For these reasons, HVIA does not support a blanket approach to the width changes for heavy trailers and therefore would not support a straight-out move to 2.55m across the board.

HVIA's preferred approach would be for the Government to conduct a RIS that segments the trailer market and evaluates the impacts based on trailer type, considering the vehicle and commodity type and the typical routes these vehicles travel on a case by case basis. Any analysis needs to adequately consider the impact on the competitiveness of the Australian industry and the retooling costs for the Australian industry.

HVIA believes that unless safety and productivity benefits exceed the cost of the retooling, transitional costs and potential loss of Australian manufacturing jobs, trailer widths should not change.

HVIA accepts that there may be specific markets where the safety or productivity benefits may justify increased widths on specific categories of routes. For example, it is likely that there may be benefits to the refrigerated and freezer segment where additional width would allow these vehicles to increase their thermal efficiency and these vehicles do not travel on all routes in the network.

While, many manufacturers of trailers would need to retool to provide wider vehicles, in the case of tankers in particular, there are likely to be substantial retooling costs associated with changing the width of the vehicles and there may also be substantial effects on the competitiveness of the local industry during the transition period. This segment would require detailed analysis.

In contrast, as discussed earlier most tippers are mass constrained and any increase in width is unlikely to generate significant benefits. Truck and dog combinations do access most of the network and for PBS vehicles there may be a need to reassess the performance of wider PBS vehicles against the PBS standards. In this case the safety risks may outweigh any benefits.

5) Transition Arrangements

The Heavy Vehicle industry is one of the important manufacturing sectors remaining in the Australian economy. Unlike the car industry the heavy vehicle industry in Australia has survived without subsidies from the taxpayer.

Any changes which would adversely impact this industry need careful analysis and it is important that Government proceeds with caution. The timing of the changes and the details of the transition arrangement are critical.

HVIA suggests that if any change is made to trailer widths, manufacturers who would require retooling may need a targeted assistance package to defray the costs of the transition.

HVIA would seek an undertaking from Government that no Australian manufacturer would be disadvantaged, and that sufficient transitional funding would be put in place to guarantee this.