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Freight Reform Advisory Panel

By email only: [Freight@transport.nsw.gov.au](mailto:Freight@transport.nsw.gov.au)

**RE: NHVR submission on the Transport for New South Wales Freight Policy Reform Consultation Paper and draft NSW Heavy Vehicle Access Policy: Safe, Sustainable and Productive Road Freight**

The National Heavy Vehicle Regulator (NHVR) commends Transport for New South Wales (TfNSW) for the comprehensive and forward-thinking approach progressing freight reform within New South Wales and across borders. The NHVR supports the initiatives set out in your Freight Policy Reform: Interim Directions Paper and looks forward to ongoing collaboration to enhance the productivity, safety, and sustainability of the road freight task.

Over the years, NHVR and TfNSW have closely collaborated on various initiatives, including the development of our new respective strategies—the draft Heavy Vehicle Productivity Plan (HVPP) 2024-2029 and the TfNSW Freight Policy Reform Program. Our strong collaboration has led to strategic and operational alignment, ensuring a cohesive approach to solving industry and government challenges, and driving innovation for heavy vehicles and road freight.

**Alignment with the NHVR's Heavy Vehicle Productivity Plan 2024-2029**

The NHVR's recently released draft HVPP 2024-2029 aligns closely with the proposals contained within your interim paper. We are particularly encouraged by the mutual objectives which aim to:

*Enhance Productivity and Resilience of Heavy Vehicle Operations*

The TfNSW Freight Policy Reform Interim Paper and Heavy Vehicle Access Policy (HVAP) is designed to optimise access on the road network for modern, high-productivity vehicles, thereby reducing vehicle movements and enabling safer, more efficient, and more sustainable freight operations. They provide a blueprint for NSW, with a particular focus on Performance Based Standards (PBS) vehicles, and aligns with the HVPP 2024-2029 and other national agendas such as the National Access Framework for Heavy Vehicles.

Similar to the NHVR's HVPP, the HVAP seeks to address network constraints and harmonise access conditions. These efforts are expected to significantly bolster the productivity of heavy vehicle operations across NSW. By optimising access to vital freight corridors and engaging in strategic network expansion, the HVAP aims to reduce congestion, streamline movements, and bring substantial economic benefits on both state and national levels.

Specific actions defined in our HVPP 2024-2029 that align with what TfNSW advocates for include:

- Targeted and prioritised expansion of end-to-end pre-approved and gazetted networks.

- Partnering to harmonise, rationalise or consolidate access conditions within and between states and territories.
- Making PBS vehicles the fleet of the future through a suite of regulatory, administrative, and access reforms.

### *Achieve Safety Outcomes*

The NHVR is committed to playing a role in achieving Australia's Vision Zero target—eliminating fatalities and serious injuries involving heavy vehicles by 2050. Similar to the Panel, we recognise that improving safety outcomes requires multi-faceted strategies encompassing infrastructure upgrades, stringent compliance, and new technologies.

The NHVR supports initiatives that enhance improvement in road safety standards, promote the uptake of newer and safer vehicles, and reduce the overall distance travelled on roads. This includes advancing PBS vehicle designs that meet higher safety specifications and aligning engineering principles for the non-PBS fleet. Accordingly, our draft HVPP 2024-2029 includes the following actions which the NHVR would welcome TfNSW's support in implementing:

- Accelerating the uptake of PBS vehicles, including by making participation easier and cheaper for industry, and through expanding approved PBS networks.
- Adapting PBS engineering principles and methods to uplift the productivity, safety, and sustainability performance of the non-PBS fleet.
- Working alongside stakeholders to reform the PBS scheme in alignment with the Ministerially endorsed Review of the Heavy Vehicle National Law (HVNL), and as outlined in the NHVR's Removing Roadblocks to Reform paper.

### *Achieve Decarbonisation Outcomes*

The NHVR is also committed to supporting Australia's target of net-zero emissions by 2050. Our focus on promoting the use of PBS vehicles and fostering the uptake of low and zero emission heavy vehicles aligns with TfNSW's aim to reduce the carbon footprint of the freight industry. Collaborative efforts in expanding networks and providing consistent access for these vehicles are fundamental to achieving our decarbonisation goals.

This includes working with TfNSW to:

- Develop higher axle load networks that transcend state boundaries.
- Facilitate seamless cross-border operations to promote industry investment in low-emission vehicles.
- Implement consistent frameworks to support and expedite the transition to greener fleets.

### *Focus on PBS vehicles*

It is encouraging to read that NSW has a strong position on supporting PBS vehicles, and agrees with the NHVR on PBS vehicle benefits extending beyond productivity to also including significant safety and decarbonisation outcomes. Importantly, we observed that TfNSW has referenced NHVR documents, including key data from our Removing Roadblocks to Reform paper and HVPP 2024-2029.

The NHVR's data and modelling substantiate the benefits of PBS vehicles. Between 2008 and 2022, the adoption of PBS vehicles over conventional heavy vehicles has resulted in improvements such as:

- Reduction of 3.2 million vehicle kilometres travelled, saving \$11.8 billion in transport and logistics costs and \$2.47 billion in diesel costs.
- Contribution to 5,400 fewer trucks on the roads, reducing CO2 emissions by 1.2 billion tonnes and preventing over 9,200 crashes, thereby saving over 100 lives.

We hope that our strong collaboration continues through implementation of the various initiatives and actions outlined earlier, so that we can accelerate realisation and maximise the benefits that can be offered by the PBS scheme.

### **Partnering with TfNSW**

The NHVR recognises that strategic collaboration with transport agencies such as TfNSW is pivotal to achieving shared goals efficiently. We are committed to working together to ensure the successful implementation of the proposed reforms. Some specific areas for ongoing collaboration include:

#### *Permit and Network Harmonisation*

We suggest a collaborative framework wherein the NHVR and TfNSW (alongside other transport agencies) can better streamline heavy vehicle access permit processes and harmonise network conditions across jurisdictions. This will significantly boost the efficiency and productivity of heavy vehicle operations. This could be achieved through the National Access Framework for Heavy Vehicles. In this regard, it is crucial to transition our approach from merely creating new notices and regulations to focusing on network expansion and optimisation.

By building safe and suitable networks that offer route choices and support end-to-end supply chains, we can adapt to changing trip origins and destinations. This approach necessitates robust partnerships that leverage automation, data, and technology to identify and prioritise accelerated delivery of high-impact network enhancements.

The NHVR Portal and National Network Map can be powerful tools in this transition. By integrating these with the National Automated Access System (NAAS), we can create a cohesive system that supports seamless, real-time updates and access decisions.

Furthermore, the Strategic Local Government Asset Assessment Project (SLGAAP), which is collecting data on local government structures in NSW to support the NAAS and the NSW Automated Access Assessment Program, can significantly enhance the granularity, accuracy, and speed of infrastructure assessments—thereby facilitating better-informed decision-making.

#### *Technology and Data Sharing*

The enhancement of the NHVR Portal and National Network Map, particularly through the NAAS, is a priority for our respective organisations. These initiatives are aligned with the vision of creating a robust repository of data and leveraging it to assist road managers in making informed decisions.

Enhancing data collection through the SLGAAP is pivotal. The project accelerates the collection of local government asset data and makes it available in a format suitable for various systems. By transitioning towards a more automated and integrated system, we can ensure quicker, more efficient access decisions that minimise disruptions and safely boost productivity.

#### *Road/Rail Interface*

An efficient and integrated end-to-end supply chain is essential where road and rail freight play complementary roles. We support the strategic consolidation and enhancement of both road and rail freight networks. Rail freight, supported by effective intermodal terminals, can optimise long-haul bulk movements, while road freight ensures efficient last-mile deliveries.

Industry must be provided the flexibility to choose the most appropriate mode of transport based on their specific needs. We advocate for a seamless transition between modes, with clear, efficient access arrangements for heavy vehicles, enabling an integrated logistics framework that maximises productivity and minimises bottlenecks.

This flexibility for industry modal choice is crucial in creating a resilient supply chain that can adapt to various logistical challenges, whether they be due to market demands, infrastructural constraints, or to overcome the disruption challenges of unplanned natural disasters.

#### *PBS and Emissions Reductions: Heavy Vehicles Role in Net Zero*

The increased use of modern, safer high-productivity vehicles, particularly PBS vehicles, plays a pivotal role in supporting the national net-zero emissions goal. PBS vehicles, capable of carrying more freight, contribute to reducing the number of vehicle movements required for the freight task. This directly assists in lowering overall emissions and societal costs related to air and noise pollution.

However, the transition to low and zero emission vehicles is not limited to PBS vehicles alone. The NHVR is committed to facilitating the uptake of non-PBS low and zero emission heavy vehicles across Australia. Ensuring these vehicles can operate seamlessly across state borders with consistent access conditions is crucial. Developing an extensive and permanent higher axle load network that transcends borders, and offering a nationally consistent framework, are pivotal steps in accelerating this transition. Cross-border alignment and robust network integration will provide industry with the confidence required for significant investment in future fleets.

#### *Other feedback*

The TfNSW Interim Paper and HVAP includes additional elements that expand on key themes of the NHVR's HVPP 2024-2029, which we support:

- The establishment of an inter-state task force to harmonise regulations outside of the HVNL, that have the effect of supporting the freight task.
- Investment in infrastructure, including necessary resilience to withstand climate and other natural disaster impacts, ensuring uninterrupted freight movement.
- Implementing road safety audits and upgrades on high-risk corridors, and enhancements in signage, lighting, and road markings dedicated to heavy vehicle routes.

- Launching of safety campaigns and working with the NHVR to promote the adoption of advanced driver-assistance systems and collision avoidance systems in heavy vehicles.
- Considering financial incentives such as tax breaks or subsidies for operators investing in low and zero-emission vehicles, and grants for retrofitting existing heavy vehicles with cleaner technologies.
- Emphasising the need for integrated planning that aligns road, rail, and port infrastructure developments, and encouraging the development of regional freight plans that identify and mitigate bottlenecks.

While not directly related to the NHVR's remit, where the NHVR can assist (e.g. the provision of data or expert advice), we encourage TfNSW to make contact so a determination may be made on what support we could offer.

## Conclusion

The NHVR is committed to working in harmony with TfNSW to realise a freight system that is productive, safe, and sustainable. We are confident that, through strategic partnerships, technological advancements, and continuous stakeholder engagement, we can address current challenges and build a resilient freight network that supports Australia's economic prosperity and environmental goals.

Thank you for the opportunity to provide our recommendations. For further information on this submission or the NHVR's HVPP 2024-2029, please contact Mr Brayden Soo, Manager, Freight and Supply Chain on [REDACTED]

Yours sincerely

A handwritten signature in blue ink, appearing to read "D. Hourigan", is positioned above the printed name and title.

David Hourigan  
**Chief Safety and Productivity**