ALC Submission

Heavy Vehicle Productivity Plan 2024-2029

Thursday, 31 October 2024

Introduction

The Australian Logistics Council (ALC) welcomes the Draft Heavy Vehicle Productivity Plan 2024–2029 as a vital step towards safer and more efficient heavy vehicle operations across Australia. As the economy grows, so does the demand for a reliable and optimised freight network. Heavy vehicles are essential in moving goods from producers to consumers, yet the industry still faces significant challenges, including complex regulations, infrastructure limits, safety concerns, and the need for innovation.

The ALC views the Draft Plan as a roadmap to tackle these progress barriers, paving the way for a more productive, safe, and sustainable heavy vehicle sector that supports Australia's economic growth.

General Agreement with the Draft Plan

The ALC endorses the Plan's key objectives and strategic focus areas, recognising them as closely aligned with national priorities for advancing freight productivity, enhancing road safety, and promoting environmental sustainability within the heavy vehicle sector. We strongly support several critical components of the Plan, including:

1. **Enhanced Network Access and Permit Efficiency:** The ALC recognises the importance of reducing administrative burdens around permits and network access for heavy vehicles. The NHVR's commitment to easing these processes aligns with the ALC's long-standing goal of improving operational efficiency across the national supply chain. Expanded network access and streamlined permitting processes can reduce delays, lower operational costs, and contribute to a more agile and responsive freight sector.

2. **Commitment to Sustainable Heavy Vehicle Operations:** The Plan's strong emphasis on the transition to low- and zero-emission vehicles supports the industry's goal of reducing its environmental impact and achieving net-zero emissions by 2050. NHVR's initiatives to expand zero-emission vehicle networks, support retrofitting programs, and advocate for increased mass and dimension allowances for eco-friendly vehicles reflect a proactive approach to sustainability. This support is critical in making low-emission technologies accessible and operationally feasible across the sector, a commitment that will help future-proof Australia's freight landscape.

3. **Safety Vision of Zero Road Fatalities by 2050:** The ALC commends the National Heavy Vehicle Regulator for prioritising safety through its Vision Zero initiative, which ambitiously targets zero fatalities and serious injuries by 2050. Critical measures such as modernising the Performance-Based Standards (PBS) scheme and increasing targeted investment in safer, more productive vehicle technologies represent essential steps toward achieving this goal.

   Safety remains a top priority for the ALC, and while the NHVR's focus on effective Safety Management Systems (SMS) is highly valued, the ALC underscores the importance of developing and implementing SMS tailored to the unique operational requirements of individual operators. ALC strongly urges the Regulator to prioritise the development of the proposed National Audit Standard outlined in Chapter 5 of the *Reforms to the Heavy Vehicle National Law Decision Regulation Impact Statement*[1].Enhanced safety measures, combined with specialised training programs, are essential to proactively reduce accidents and incidents on our roads. With Jobs and Skills Australia reporting a critical shortage in truck drivers—ranking them 4th among the most

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[1]
https://www.ntc.gov.au/sites/default/files/assets/files/Reforms%20to%20Heavy%20Vehicle%20National%20Law%20Decision%20Regulation%20Impact%20Statement%20-%2004102024.pdf

in-demand occupations nationally[2]—the ALC believes that there is a crucial opportunity to promote innovation, enhance workforce training, and improve safety standards. By doing so, the Productivity Plan can make truck driving a more appealing career choice and bolster workforce resilience.

The ALC further advocates for a collaborative approach between industry stakeholders and regulatory bodies, focusing on comprehensive training initiatives that equip operators with the skills and knowledge needed to consistently uphold and advance safety standards.

4. **Resilient and Adaptive Freight Networks:** The ALC supports the Plan's commitment to building resilient networks that can withstand disruptions, such as natural disasters. By developing frameworks for emergency access and creating alternative routes, the NHVR will ensure that goods can continue moving across the nation, even under adverse conditions. This resilience is essential to sustaining Australia's economy and supporting community well-being.

5. **Enhanced Productivity through Infrastructure Investment:** Increasing productivity in the heavy vehicle sector hinges on infrastructure investments that expand access to key freight routes and facilities. The ALC backs NHVR's commitment to infrastructure upgrades as they are crucial to meeting rising freight demands and reducing operational inefficiencies. Enhanced infrastructure will not only increase productivity but also reduce transit times and operational costs, benefiting businesses and consumers alike.

6. **Embracing Innovation and Technology:** ALC recognises that technological advancements are integral to improving safety and operational efficiency in the heavy vehicle sector. While the Draft Plan encourages technology adoption, the ALC emphasises the need for accessible training and support, particularly for smaller operators who may find high technology costs prohibitive. Establishing industry-wide training programs will bridge the skills gap, foster innovation, and prepare the workforce to adapt effectively to evolving technologies.

7. **Fostering Industry Collaboration:** The ALC strongly supports the collaborative approach outlined in the Draft Plan, encouraging continuous engagement between industry stakeholders, regulatory bodies, and operators. A unified approach is essential for overcoming sector challenges, fostering best practices, and enhancing compliance frameworks. Engaging regularly with industry representatives ensures that operator perspectives are heard, enabling NHVR to develop practical, effective solutions that reflect the needs and realities of the sector.

Request for Greater Detail in Action Plans

While the NHVR's draft plan effectively outlines strategic goals, the ALC believes that greater specificity within each action item will better equip stakeholders to participate actively and collaboratively in the Plan's successful implementation. Enhanced details will ensure that industry participants have the necessary clarity to align their operations, investments, and resources with the Plan's objectives. The ALC recommends the inclusion of the following elements:

1. **Addressing the Impact of HVPs on Rail Network**

As HPVs continue to play a larger role in Australia's freight network, it is essential for industry, governments, and policymakers to address the cross-sectoral impacts that arise within an integrated transport system. The productivity gains of one transport mode often create significant infrastructure demands for another. In the case of longer, heavier HPVs, there are critical implications for the rail network—specifically at level crossings. These range from the need to adjust signal timing and boom gate operations to ensuring that crossings can safely support increased axle loads.

The financial burden of adapting level crossing infrastructure to accommodate these demands should not fall solely on the rail sector. Instead, these costs should be equitably shared with the road sector, or with the entities responsible for introducing the increased vehicle dimensions and loads. This collaborative approach would create a more sustainable, balanced system that supports both road and rail infrastructure in Australia's interconnected transport network.

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2. **Implementation Steps and Process Transparency**

Each of the 22 outlined actions would benefit from a step-by-step breakdown of tasks and clear delineation of roles among the NHVR, government agencies, and industry partners. For instance, the action to "Deliver a notice development and maintenance program" could specify how notices will be identified, reviewed, and streamlined across jurisdictions. Providing process details in this way can help stakeholders anticipate areas where inter-agency or industry collaboration will be essential, thus facilitating smoother, more coordinated execution.

3. **Detailed Timeframes and Milestones**

While the Plan sets the direction for a five-year period, specifying timelines for each phase or component of the Plan would greatly enhance planning and accountability. Defining short-, medium-, and long-term milestones for initiatives such as enhancing the NHVR Portal's capabilities or expanding the use of the National Automated Access System (NAAS) would enable stakeholders to track progress, anticipate adjustments, and allocate resources accordingly.

4. **Resource Allocation and Funding Considerations**

Successful implementation of the Plan's ambitious goals will require sustained investment. Providing an outline of required resources—whether financial, technical, or personnel-related—would give clarity to the industry and enable informed participation in resource allocation. For instance, actions like "Supporting local councils in road asset assessment" would benefit from detailing the training resources or funding available to councils, which can encourage timely uptake and maximise the impact of these initiatives at the local level.

5. **Metrics and Key Performance Indicators (KPIs)**

To evaluate progress and ensure accountability, it is critical to establish specific metrics and KPIs for each action. For example:

- **Access and Permit Efficiency:** Metrics could include the percentage reduction in permit processing times, the decrease in the volume of permits required, and the expansion in pre-approved network kilometres.
- **Environmental Impact:** Tracking the number of zero-emission vehicles added to the network, or reductions in emissions per freight tonne-kilometre, would provide measurable insights into environmental outcomes.
- **Safety Improvements:** KPIs might focus on the reduction in heavy vehicle-related fatalities and injuries over time or increases in compliance with advanced safety standards under the PBS scheme.

These quantitative indicators would allow the NHVR and stakeholders to monitor the Plan's effectiveness, providing data-driven insights into areas requiring adjustment or additional support.

6. **Collaboration and Feedback Mechanisms**

The ALC suggests establishing a structured mechanism for ongoing stakeholder engagement, feedback, and collaboration throughout the Plan's lifecycle. Regular check-ins and consultation phases can ensure that industry and government stakeholders stay aligned on implementation progress, respond promptly to emerging challenges, and share best practices.

The ALC proposes the implementation of an Annual Overview of Key Actions undertaken by the regulator as a fundamental component of the Heavy Vehicle Productivity Plan (HVPP) 2024-2029. This initiative aims to enhance transparency and public engagement while fostering a culture of continuous improvement within the heavy vehicle sector.

Conclusion

The ALC fully supports the NHVR's efforts to deliver a more productive, safe, and sustainable heavy vehicle network for Australia. The Draft Heavy Vehicle Productivity Plan 2024-2029 demonstrates a forward-thinking approach to addressing the evolving needs of Australia's freight industry. By incorporating additional layers of detail into the action plan, stakeholders will be better positioned to engage effectively and contribute significantly to the successful implementation of the Plan's objectives.

The Australian Logistics Council recommends the following actions to enhance the effectiveness of the Plan:

- **Define Clear Action Items:** Specify the steps, timelines, resources, and performance metrics for each action item to improve stakeholder alignment and accountability.

- **Implement Collaborative Frameworks:** Establish structured, ongoing collaboration and feedback channels to ensure a flexible and responsive implementation process.

- **Recognition and Development of National Audit Standard (NAS**), as outlined in Chapter 5 of the *Heavy Vehicle National Law High-Level Regulatory Framework (Decision Regulation Impact Statement)*: This standard should be universally adopted for both statutory and non-statutory accreditation schemes to create a unified approach for Safety Management Systems (SMS). By doing so, the need for multiple audits to test compliance with chain of responsibility obligations would be reduced, leading to lower costs for operators and improved operational efficiency across the industry.