SUBMISSION

Delivering Safer Heavy Goods Vehicles for Australia and New Zealand

Submission on the proposed heavy vehicle safety rating scheme.

Submission to ANCAP Safety

Australian Logistics Council

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1. About the Australian Logistics Council

The Australian Logistics Council (ALC) is the national peak body representing Australia's supply chain logistics and freight transport industry.

Our members operate across the end-to-end supply chain, including road transport, freight rail, ports, airports, terminals, warehousing, distribution, logistics property, technology and major freight customers.

ALC works with governments and regulators on policy settings affecting safety, productivity, investment and the efficient movement of goods.

2. Executive Summary

ALC supports ANCAP's objective of improving heavy vehicle safety and sees value in an independent rating scheme, provided it complements existing regulation and reflects Australian operating conditions. A well-designed scheme could help fleet purchasers compare safety performance above the regulatory minimum and support national road safety objectives.[1]

Road freight carries more than 75 per cent of Australia's non-bulk domestic freight. Heavy vehicle purchasing decisions therefore affect more than individual operators. They influence network access, payload, fleet productivity, freight cost and the resilience of supply chains serving businesses and communities across Australia.[2]

Australia should build on the evidence and investment behind Euro NCAP rather than reproduce work already done. European methodology should not, though, transfer automatically. Australian crash exposure, road conditions, long-distance and regional operations, bonneted and cab-over vehicle architectures, and high-productivity combinations all need to be reflected in testing, scoring and weighting.

The role of ANCAP should also remain clear. ANCAP is a voluntary, non-regulatory consumer information program that complements the Australian Design Rules. The Commonwealth sets standards for new vehicles, while the NHVR applies in-service vehicle standards under the Heavy Vehicle National Law in participating jurisdictions. The heavy goods vehicle scheme should sit coherently alongside these arrangements and clearly distinguish legal compliance from safety performance above the minimum standard.[3][4]

An ANCAP rating should help operators make safer purchasing decisions without creating conflicting signals, favouring one vehicle architecture or treating a prime mover rating as a proxy for the safety of a complete combination. The scheme should also account for post-crash response and the long operating life of heavy vehicles.

1Australian Government, National Road Safety Strategy, Road safety performance, accessed November 2026.
2Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, Freight & supply chains, accessed November 2026.
3National Heavy Vehicle Regulator, Vehicle Standards team, 'Requirements for new vehicles' and 'Requirements for in-service vehicles', accessed November 2026.
4ANCAP Safety, Frequently Asked Questions, sections 'Is ANCAP testing mandatory?' and 'How does ANCAP relate to the Australian Design Rules?', accessed November 2026.

3. ALC Recommendations

No.	ALC recommendation
1	Design the rating framework around Australian crash risk, operating conditions and freight tasks.
2	Position ANCAP as a voluntary scheme that complements the Australian Design Rules and NHVR in-service standards, with a clear distinction between legal compliance and rating performance.
3	Use Euro NCAP testing and evidence where transferable, but validate scoring, weighting and local performance for Australian vehicles and roads.
4	Keep the assessment technology- and architecture-neutral, measuring safety outcomes rather than favouring vehicle designs or named technologies.
5	Make clear that a prime mover rating is not a rating of the complete operating combination, and consider trailer compatibility, braking and stability where relevant.
6	Include post-crash criteria relevant to regional and remote response and alternative powertrains, including rescue information and emergency notification.
7	Use rating datestamps, validity periods and clear reassessment rules for significant software or specification changes, modifications and removal of safety features.
8	Stage implementation and review the scheme after practical experience, including safety outcomes, purchasing influence, testing costs and unintended productivity or competition impacts.

4. Australia's heavy vehicle safety framework and operating environment

ANCAP should be clear about where its rating sits within Australia's existing heavy vehicle safety framework. The Australian Design Rules set minimum requirements for new vehicles. The NHVR applies in-service vehicle standards and manages modifications and exemptions in participating jurisdictions. ANCAP's role is different: it can compare safety performance above the minimum and influence purchasing and manufacturer behaviour.

These layers should operate coherently, but they do not need to be identical. A vehicle that complies with the Australian Design Rules is legally compliant even if it does not achieve a high ANCAP rating. ANCAP should explain this distinction clearly, so fleet buyers do not confuse a voluntary rating with regulatory approval.

The 2023 Safer Freight Vehicles package shows why local design matters. The Commonwealth amended the Australian Design Rules to allow eligible new heavy vehicles to operate at up to 2.55

metres overall width when specified safety requirements are met and excluded a number of safety devices from width and length measurements. The reform pursued safety and freight productivity together rather than treating them as competing objectives.[5]

The same principle should guide the heavy goods vehicle rating scheme. Australian fleets use both bonneted and cab-over vehicles across different tasks. ANCAP should measure safety outcomes rather than inadvertently favouring vehicle architecture common in Europe. Direct vision, crash protection, braking, stability and active safety performance should be assessed in a way that recognises different design pathways to equivalent safety outcomes.

Vehicle suitability matters for ALC members because safety, payload, network access, reliability and cost are linked. A rating that does not reflect the freight task risks distorting purchasing decisions without improving safety outcomes.

5. Build on Euro NCAP, but validate for Australian conditions

ALC supports using Euro NCAP as the starting point for an Australian heavy goods vehicle rating scheme. A familiar star-rating approach and common technical evidence can reduce duplication, lower testing costs and give operators information they can readily understand.

Where a European test result is clearly transferable, ANCAP should be able to accept that evidence. Where hardware, software, calibration, road environment, signage, vehicle configuration or operating conditions differ, ANCAP should require appropriate Australian validation. This approach avoids unnecessary retesting without assuming equivalence where it does not exist.

Australian scoring and weighting should be grounded in local crash and exposure evidence. The risks faced by an urban distribution truck are not identical to those faced by interstate line-haul, regional or remote freight. ANCAP should publish the evidence supporting the tests and weightings selected for the Australian scheme.

Australian-specific risks should be recognisable without hard-coding one technology. Bridge strikes are one example of a safety and network-disruption risk with material economic consequences. ANCAP could assess whether a vehicle or system effectively reduces over-height and route-restriction risk while remaining neutral about how a manufacturer achieves the outcome.[6]

Euro NCAP's heavy vehicle program is itself still developing. Australia has an opportunity to learn from that work without treating every current element as settled. ANCAP should publish which Euro NCAP results it will accept, what local validation is required and how Australian-specific criteria affect the final rating.[7]

5Australian Government, 'Facilitating safer trucks in Australia', media release, September 2023.
6HERE Technologies and HoustonKemp, The Economic Cost of Bridge Strikes in Australia, 2026; see also HERE Technologies submission to ALC on the proposed ANCAP Heavy Vehicle Safety Rating Scheme, October 2026.
7Euro NCAP, Truck Safe program and heavy goods vehicle assessment material, 2024-2026.

6. Assess safety in the context of the operating combination

Australia makes extensive use of Performance Based Standards and other high-productivity combinations. Articulated vehicles also feature prominently in major heavy vehicle loss claims. This means prime mover safety cannot be viewed in isolation from trailer configuration, braking, stability, load and equipment compatibility.[8]

A prime mover rating should not be interpreted as an assessment of the safety performance of the complete operating combination. ANCAP should state the scope of each rating clearly and consider how supporting information can address trailer compatibility and combination-level systems. NHVR guidance already recognises that advanced braking systems fitted to trucks and trailers need to be connected and functioning as intended when operating in combination.[9]

Where trailer-related performance materially affects a safety outcome, ANCAP should identify that limitation or dependency in the supporting rating information even if the trailer itself is not given a separate star rating. This would give operators more useful information than implying that the prime mover score captures all operating risk.

7. Post-crash safety and emergency response

Post-crash performance matters across all freight tasks, and Australian geography increases its importance. Crashes on regional and remote routes can involve longer response and recovery times. The growing use of battery-electric and hydrogen heavy vehicles also introduces hazards that first responders may encounter less frequently.

ANCAP should include standardised rescue information, energy-isolation information, cabin access and extrication considerations, location information and emergency notification within the post-crash assessment. Euro NCAP already includes rescue information and post-crash intervention within its assessment framework.[10]

Automatic emergency notification and location systems may be particularly valuable on long-haul and remote routes. ANCAP should assess the safety outcome rather than prescribe one supplier or product. As the heavy vehicle scheme develops, ANCAP should also ensure its Rescue app provides relevant heavy goods vehicle information for first responders.

8. Rating life, maintenance and ongoing safety

Australian heavy vehicles remain in service for long periods. BITRE reports that the average age of a heavy rigid truck was 16.19 years in 2025, while the average articulated truck was 12.53 years. This makes the continuing performance of sensors, cameras, software, braking and other safety systems as important as their fitment when the vehicle is new.[11]

8National Truck Accident Research Centre, Major Accident Investigation Report 2025.
9National Heavy Vehicle Regulator, Vehicle Standards Guide 25, Connecting advanced braking systems in combination, updated 23 June 2026.
10Euro NCAP, Heavy Goods Vehicle Post-Crash Assessment Protocol, current protocol, 2026.
11Bureau of Infrastructure and Transport Research Economics, Road Vehicles Australia, January 2025, Table 3: Average vehicle age by vehicle type.

An original ANCAP rating should therefore include a clear rating date stamp and validity information. The scheme should explain when significant software changes, removal of safety features, major modifications or materially different specifications require reassessment. ANCAP already uses datestamps and rating validity rules in its light-vehicle program.[12]

For the second-hand market, the rating should not imply that every safety system still functions as it did when the vehicle was new. ANCAP should help buyers understand what the original rating represented, what changes can affect that rating and which critical systems require inspection, maintenance or calibration. This would assist smaller fleets and owner-operators without turning ANCAP into an in-service regulator.

Given the scheme is new, ALC supports staged implementation followed by an early review once practical experience is available. The review should consider whether ratings influence purchasing, whether the tests produce meaningful Australian safety information, the cost of testing, and any unintended effects on productivity or competition.

9. Conclusion

ALC supports ANCAP's objective of improving heavy vehicle safety and sees value in an independent heavy goods vehicle rating scheme that provides trusted information to fleet operators and freight customers.

The Australian scheme should use international evidence wherever it transfers cleanly, while remaining designed around Australian vehicles, roads, freight tasks and regulation. It should operate coherently with the Australian Design Rules and NHVR in-service standards, remain technology- and architecture-neutral, and make each rating's scope clear.

For ALC, success is a scheme that leads to safer purchasing decisions and encourages better vehicle safety without confusing regulatory compliance or creating unnecessary impacts on freight productivity.

12ANCAP Safety, Frequently Asked Questions, 'How long does an ANCAP safety rating last?' and rating datestamp guidance, accessed November 2026.