Review of the Intelligent Access Program

In May 2013, Australia’s transport ministers requested the National Transport Commission (NTC) to undertake a review of the Intelligent Access Program (IAP).

The IAP electronically monitors the location and speed of heavy vehicles assuring road authorities that enrolled vehicles are complying with their road access conditions. Transport operators enrol in the IAP to gain better access to particular roads or to meet access conditions set by road authorities. Some transport operators may use the IAP to negotiate better road access with road authorities.

The IAP was developed by Austroads and the program has been in operation since 2009. The NTC had a specific task of developing the laws that underpin the privacy and security of the program.

The IAP is the first example of using telematics within the regulatory framework for managing heavy vehicles in Australia. The program has attracted considerable interest from overseas and has been used to develop international standards for telematics systems and services.

The draft report for the review of IAP was released for public comment on 13 June 2014, followed by a six-week consultation period. Five submissions were received from state and territory government and industry stakeholders. The NTC has considered all stakeholder comments and feedback to finalise the review paper.

This final review paper with the proposed recommendations has been endorsed by the Transport and Infrastructure Council in November 2014. Next, the relevant parties will implement the recommendations.

Proposed recommendations

The NTC made five recommendations in the draft report. The recommendations included:

1. Transport Certification Australia Board reports statistics about the IAP in its annual reporting including:
   - number of vehicles enrolled in the IAP by application type and by state and territory
   - number of intelligent access conditions
   - number of kilometres travelled by enrolled vehicles and by application type.

2. Transport and Infrastructure Council approves changes to the IAP specification (with the Transport and Infrastructure Senior Officials Committee being able to approve any minor and non-contentious changes).

3. Transport Certification Australia Board makes a public version of the IAP specification available on its website.

4. Transport Certification Australia Board reviews the re-certification process to provide more certainty to service providers regarding timelines.

5. Transport Certification Australia Board publishes information about the data that operators are able to obtain from service providers.
Key issues from submissions
This section summarises the feedback received from stakeholders over the consultation period for the draft report:

- Overall, New South Wales, Victoria, and Northern Territory expressed their support for the five recommendations.

- The Australian Trucking Association (ATA) supported the five recommendations as it ‘adds a level of rigour to the IAP business model through their emphasis on greater transparency’. The key issue for ATA is the requirement of IAP for Higher Mass Limits access in New South Wales and Queensland. ATA has stressed that IAP does not deliver first and last mile access and the IAP approach is focused on asset protection over providing greater productivity gains for the industry.

- Road authorities in New South Wales and Queensland reaffirmed that the IAP is an appropriate way to manage access for Higher Mass Limits vehicles due to the large number of timber bridges on these networks. New South Wales and Queensland may consider other compliance assurance measures as long as these measures provide the same compliance outcomes as the IAP. This is likely to be an ongoing issue raised by industry.

- ARRB noted that the data required to measure the performance and outcomes of programs such as IAP and potentially the future Electronic Work Diary (EWD) needs to be more defined and includes considerations for issues such as ‘who can have access to such data’, ‘what is the mechanism where access is obtained’, and ‘who will be the actors who will perform the roles identified’.

Origin of this review
In May 2003, the Ministerial Council agreed to a recommendation from Austroads for a staged implementation of the IAP. This recommendation was underpinned by a 2003 Austroads feasibility report that described the costs, benefits and impacts of introducing the IAP. The program proposed the use of vehicle telematics technology, through certified service providers, to remotely monitor heavy vehicles to ensure they are complying with the agreed operating conditions and report non-compliance information to relevant road authorities.

A key implementation task was to develop the model law. The National Transport Commission (NTC) developed the model laws that gave national legal effect to the policy and operational framework of the program. Austroads developed the 2005 Regulatory Impact Statement that accompanied the model law. The Ministerial Council approved the model law in January 2006.

The IAP became formally operational in 2009 and transport companies could enrol their vehicles in the program to obtain access to the road network, where the IAP has been made a condition of access by road authorities.

In 2012, the NTC was requested to review a number of policy matters relating to the program as part of the National Heavy Vehicle Regulator’s National Industry Productivity Packages. Following this, at the NTC’s planning workshop with government and industry stakeholders held in December 2012, a review of the program was seen as a priority for NTC’s work program for 2013-14. Transport and Infrastructure Ministers approved the work program containing the review of the IAP in May 2013.

Scope and the objective of the review
The objective of the review is to report the progress and achievement of the IAP to date and make any recommendations to improve the program. More specifically, the review seeks to:

- evaluate the effectiveness of the IAP against the intended outcomes as specified in the 2005 Regulatory Impact Statement, and
- discuss the various applications of the IAP as a condition for access by road authorities.
In May 2013, the NTC commenced the review of the IAP and requested inputs from interested organisations and individuals. In June 2013 the NTC wrote to key government and industry stakeholders seeking information to inform the review. The NTC consulted with stakeholders such as transport operators and local governments to ensure the review included a wide range of views. Seventeen submissions were received after a six-week consultation period.

Following the completion of this consultation phase, comments and submissions were analysed. Seventeen submissions were received. The NTC held a workshop in December 2013 to present and discuss the preliminary findings for the review. The discussions and outputs from this workshop have been analysed and used to prepare the draft report. The draft report was released for public comments on the 13th June, followed by a six-week consultation period.

The NTC considered all five submissions we received to finalise the review paper. This final review paper with the proposed recommendations is submitted to the Transport and Infrastructure Council for consideration in November 2014. If these recommendations are approved, the relevant parties will implement the recommendations.

**Key findings**

The review found:

- The rollout of the technically complex IAP project was well managed and the IAP is now part of the heavy vehicle regulatory landscape in Australia.
- The IAP is currently operational and available in six states: New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia.
- At July 2013 there are 2483 vehicles enrolled in the IAP compared with an estimated take-up number of 8383.
- Factors that may have contributed to lower than expected vehicle take-up numbers are: road authorities have made fewer than the anticipated IAP applications available; the introduction of concessional mass limits; enrolment costs; the demand for higher mass limits may have been overestimated; and heavy vehicle access issues on local roads.
- The estimated costs of the IAP to governments were around $203 million compared to the actual costs of around $68 million. The key factor for these lower costs is that not all states and territories have implemented the program and not all IAP applications have been used.
- The estimated benefits of the program to governments were around $107 million. The NTC was unable to calculate the actual benefits to governments due to lack of data.
- The estimated program costs to industry were around $62 million over its first five years. The actual costs to industry range from $18.8 million to $24.3 million, based on 2483 vehicles across four operational years.
- The benefits of the program to transport operators were estimated to be around $280 million. The NTC was unable to calculate actual benefits to operators. Case studies from individual companies show benefits include greater payloads and fewer trips.
- It appears that the objective of the IAP is being achieved.
- Important issues for industry are access decisions involving the IAP, and first and last mile access. Under the current arrangements, road authorities determine access conditions for heavy vehicles. For example, road authorities in New South Wales and Queensland have undertaken risk-assessment processes and have concluded that the IAP is a compliance tool that is needed to help manage vulnerable infrastructure as well as other factors. The recent establishment of the National Heavy Vehicle Regulator and new review processes in the Heavy Vehicle National Law should help to achieve better access over time.
Clarification to note

Stakeholders have highlighted a number of discrepancies that needed further clarification or changes in the draft report. The following table addresses the sections where clarification or amendments are required.

Note: This section should be read in conjunction with the *Review of the Intelligent Access Program draft for consultation June 2014* report. The report can be accessed via the NTC website.

<table>
<thead>
<tr>
<th>Draft report reference</th>
<th>Clarification or suggested changes</th>
</tr>
</thead>
</table>
| Section 4 – Page 9 3rd paragraph | “The implementation of IAP in a stage two setting.”  
To note:  
Victoria has indicated that the state did not require the progression to stage two but supported the early adoption to allow Queensland’s and New South Wales’ application to progress. |
| Section 4 – Page 9 4th paragraph | It should read:  
The initial IAP applications that became operational in 2008 were the New South Wales Road Train Modernisation Program and the quad axle port access scheme and heavy mobile cranes and concrete pump trucks in Victoria. |
| Section 5.2.2 – Table 2 | The table has incorrectly identified the availability of IAP for ‘Medium articulated vehicles with dog’ and ‘Performance-based standards related vehicles’  
It should be noted that IAP is available for ‘Medium articulated vehicles with dog’ in New South Wales only. ‘Performance-based standards related vehicles’ is available in New South Wales, Victoria and Queensland.  
Further, Victoria applies IAP to only a small number of PBS vehicles (around five per cent). This includes high productivity freight vehicles (>26m and >68.5T) and vehicles which comply with the NTC quad axle trailer policy (e.g. 50T semi-trailers)* |
| Section 5.2.5 – Page 23 2nd paragraph | Victoria reported that actions such as warnings and providing information to operators have reduced the number of non-compliance reports and improved compliance with permits. It was noted that IAP has been used as an additional tool in issuing improvement notices and infringements to operators in a small number of cases in Victoria. The state has indicated that it intends to increase enforcement of IAP non-compliance, following an education focus since IAP was introduced in 2008. |
| Section 5.2.5 – Page 23 4th paragraph | To remove:  
‘It should be noted that road authorities have not used the IAP to target high-risk operators or used as an additional enforcement tool to identify breaches unrelated to the access conditions.’  
VicRoads noted that this statement is incorrect and IAP has been used as an enforcement tool where improvement notices and infringements have been issued in some states. |
| Section 5.3.2 – Page 26 2nd paragraph | The estimated cost to government to implement the IAP, shown in the report did not include the costs associated with developing or acquiring specialist systems to manage the IAP processes.  
It should read:  
The actual costs also included road authorities’ implementation costs and staff training. The road authorities’ cost estimates were derived from the road authorities’ feedback on the number of full-time equivalent staff who were involved in managing the program. It does not include any costs associated with developing or acquiring specialist systems to manage the IAP processes as the data was not provided to the NTC. |