12 December 2025

Submission to the National Transport Commission Re: Heavy Vehicle Charges Consultation report 2026-27

Gas Energy Australia acknowledges the work of NTC in seeking consultation on this matter.

Gas Energy Australia is the national peak body representing the downstream gas fuels industry, encompassing Liquefied Petroleum Gas (LPG) and associated gases.

Regarding the *Heavy vehicle charges consultation report* (Oct 2025), our members accept the need to proportionally balance heavy vehicle revenue through RUC, registration and other compliance charges with forecast roading expenditure.

We ask that the following also be considered in context by the ITMM:

1. **Consumer impact:** the increase of HV charges is approximately double that of current general inflation, leaving business owners with the option of either absorbing those costs to the detriment of their own businesses OR passing costs onto consumers. Household energy consumers of LPG are frequently rural or remote or have specialist needs, they will incur a cost increase as a result of these charges. All energy consumers have vulnerabilities which must be considered not only by suppliers, but by government.
2. **Consistency of compliance costs:** We recognise from the ITMM statement "the dissent of Queensland and the non-participation of Western Australia and the Northern Territory." Inconsistency of cross-border heavy vehicle compliance and enforcement, and the relative costs to industry of those, require consideration. Inconsistencies exist in inspection requirements, aspects of driver and vehicle licensing, and other on-road and operational compliance elements. These lead to significant administrative and operational costs for transporters operating across borders. We invite NTC to engage in more detail on these differences, to mitigate the costs created through variance.
3. **Private control of certain roading infrastructure:** One example of this issue can currently be seen at WestGate in Melbourne, but it is not the only example. Control of public roading infrastructure by private operators who are able to implement and manage tolls, and who can restrict the access to certain transportation, drastically alters transport route options. That influence affects operational efficiency for transport businesses, while it also influences wear and maintenance on alternative roading infrastructure. Few transporters are more affected by such arrangements than bulk transporters of dangerous goods. Some governments have disavowed responsibility for new or increasing tolls on key routes, taking an ‘arms-length’ position, leaving private commercial organisations wielding control of critical public roading infrastructure. It is not equitable or sustainable for transporters to pay tolls where they receive limited or no benefit from infrastructure development. Tolls to

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road users and access to infrastructure, must be accounted for in the overall equation of cost and recovery underlying this consultation.

Gas Energy Australia thank you for the opportunity to comment. We would be happy to expand in more detail upon any part of this submission.

Sincerely,

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