

9 October 2017

Jeff Potter
National Transport Commission
Level 3, 600 Bourke Street
Melbourne Victoria 3000

Dear Mr Potter,

Assessing the effectiveness of the PBS Marketplace – ARRB’s response NTC’s discussion paper

In response to the NTC’s discussion paper on the effectiveness of the PBS marketplace, ARRB has formed responses to some of the NTC’s proposed actions (Section 8.1) and these are detailed in the following.

1. Sector: Supply chain/Regulatory/Process

Possible actions

Review the PBS framework and the standards to improve productivity, safety and the precision of matching vehicles to roads.

ARRB’s responses to the NTC’s five points in this sector are as follows:

1. There should be a full review to identify areas of improvements, obsolete standards requiring adjustment or removal, and consideration of an update of the performance levels to suit current understanding of vehicle performance. The review should address other issues such as tyre performance, and remove other impediments to uptake of PBS vehicles. The use of modern safety technology should be encouraged through the scheme, but its presence should not mean diluting or replacing standards and moving to a reliance on technology to provide safety that should be inherent in a vehicle’s mechanical design.
2. ARRB agrees with this point. It would be beneficial to promote better utilisation of existing PBS application information to focus future investment on vehicle designs and network access.
3. ARRB agrees with this point.
4. ARRB agrees with this point. Austroads report AP-R541-17 identified areas for further research, and can be built upon to include the use of wide single tyres and other technology advancements that can reduce vertical pavement loading. Understanding of benefits is dependent on vehicle crash data; the current basis for the safety benefits of PBS vehicles in AP-R541-17 is lacking. The crash statistics that were the basis of the NTC discussion paper do not consider freight types, vehicle types, distances travelled and other important factors that are necessary for a fair comparison of crash risk. The limitations of that crash analysis should be acknowledged. There is a need for a true representation of vehicle safety beyond the exposure-dependent benefits used as a conservative estimate. Gathering the data necessary to do this should be given high priority.
5. ARRB agrees with this point and wishes to emphasise the recommendations of the National Steer Axle Mass Limit report (AP-R505-16), which outlined the testing program required to fill in identified gaps in wide single tyre data.

2. Sector: Regulatory/Process

Possible action

Investigate the need to develop a simplified PBS scheme for popular and mature PBS designs backed by greater access certainty.

ARRB does not support the development of blueprints for vehicle designs by the NTC or other similar organisations, and agrees with the NTC on this point. If blueprints are to be developed, they should be developed by designers and assessors for their own use, within the current PBS application process and reviewed by the PBS Review Panel.

3. Sector: Regulatory/Access

Possible action

The NHVR publish national notices for all four levels of PBS network

ARRB supports this recommendation and believes that the NHVR should publish access notices and provide tools to facilitate the expansion of the network, and access decisions.

4. Sector: Access

Possible action

Austroads and the NHVR develop a nationally harmonised infrastructure capability assessment framework for use in all access decision making.

ARRB supports this recommendation. It is essential that open access is provided to public data, such as bridge capacity information, to enable various parties to contribute to asset assessment. This will require a harmonisation of data sets and infrastructure assessment methods across jurisdictions, so that the assessment process can be carried out consistently across all regions. Data sets need to be managed so that they are auditable and trackable.

5. Sector: Regulatory

Possible action

Develop a Regulatory Impact Statement (RIS) to assess whether a performance based approach should be the standard to assess and register a heavy vehicle's suitability on the road. This would apply to all new heavy vehicles over 42.5 tonnes.

ARRB supports the development of a RIS on this topic and recommends that it include the removal of ADR 43.

6. Sector: Supply chain

Possible action

Engage with non-road infrastructure owners to identify the costs and benefits of upgrading their infrastructure to accommodate PBS vehicles. Also engage with ancillary operators to identify if the PBS scheme can optimise the productivity and safety of their heavy vehicle fleet.

ARRB supports this recommendation, but recommends that it be done according to commodities so that it suits each freight task, rather than being a blanket approach covering all PBS vehicles. Different commodity industries will have varying requirements for access.

7. Sector: Strategy/Supply chain

Possible action

Identify if there is a need to develop a performance based approach for medium-to-heavy duty commercial vehicles (8 t to 42.5 t total mass) and buses operating in urban areas.

ARRB supports this recommendation and stresses that this should not result in the absorption of smaller heavy vehicles into the current PBS scheme. PBS is currently suited to innovative single- and multi-combination vehicles and was designed to accommodate them. The PBS rules aren't expected to offer benefits for lighter rigid trucks. The UK's Fleet Operator Recognition Scheme (FORS) and the Safety, Productivity and Environment Construction Transport Scheme of NSW (SPECTS) are examples of programs that encourage safer, more efficient and more productive vehicles. A performance based program like these should be investigated and it is expected that it would cover fuel savings, visibility, use of modern technology, noise, emissions and other performance aspects that aren't part of PBS but are important to urban operation.

Yours sincerely,



Philip Roper

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Congestion, Freight and Productivity