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Submission to: National Transport Commission

Title: Assessing the effectiveness of the PBS Scheme

Date: 9 October 2017

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1.0 Introduction

The National Transport Commission (NTC) has conducted a review of the effectiveness of the Performance Based Standards Scheme (PBS) and has made a number of recommendations for future development of the scheme

2.0 HVIA

Heavy Vehicle Industry Australia (HVIA) represents and advances the interests of the entire industry involved in the design, manufacture, importation, distribution, modification, sale service and repair of on-road vehicles with a gross vehicle mass or aggregate trailer mass over 3.5 tonnes as well as their components equipment and technology. The industry directly employs over 36,000 people and provides some of the world's most efficient, safe, innovative and technologically advanced vehicles. HVIA seeks to work with government and industry stakeholders to promote an innovative and prosperous industry that supports a safe and productive heavy vehicle fleet operating for the benefit of all Australians.

3.0 Report Sections & HVIA Response

3.1 General Comments.

HVIA commends the NTC for undertaking a review of the PBS system. The discussion paper provides good evidence that the PBS scheme has delivered substantial benefits to the community and to road managers. However, it is clear that the understanding of the type and magnitude of these benefits among the general community, some road managers, and policy makers is poor. One of the key tasks the NTC will need to undertake following the publishing of this report is to ensure that the benefits of PBS are more widely understood by these groups. HVIA is keen to work with the NTC and the NHVR on the implementation of the recommendations of the report.

The terminology in this discussion paper with respect to registration is loose. In a number of places the report makes reference to newly registered vehicle combinations. This terminology is confusing. In Australia, individual vehicles are registered (e.g. trucks and trailers). Combinations of vehicles are not registered as a combination and operators are free to change around the vehicles within a combination. However, to operate in the PBS scheme, the individual vehicles must be approved to operate within a PBS combination. Therefore the meaning of some sections within the report is not clear. An example is the comment that "in 2016, 25 % of all newly registered heavy vehicle combinations were PBS approved" (pg. 11 paragraph 5, and pg. 29 second paragraph of discussion on productivity performance measure). Given that combinations are not registered, the meaning of this section is not clear.

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HVIA has been trying to work closely with the NHVR on a range of improvements to the PBS scheme. However, the rate of progress on many important issues by the NHVR has been slow. For example over 12 months ago HVIA wrote to the NHVR that they take action on braking standards for PBS combinations. Further, in December 2016, HVIA wrote to the NHVR outlining a range of issues related to the PBS certification process. Despite repeated requests from HVIA to progress these issues in consultation with industry, the NHVR has not yet taken action on these or any of the other important reforms needed for PBS. HVIA is hoping that the publication of this report will act as a catalyst for reform.

3.2 Comments on Section 5 Industry and Stakeholder Comments

HVIA notes that a number of the comments provided by industry and Government Stakeholders have been addressed elsewhere in the report. In addition to the comments raised in this report, there are a number of more specific comments that HVIA has provided on suggested improvements to the PBS scheme, and particularly the PBS certification process. These comments have been provided directly to the NHVR. The ongoing improvement to the PBS scheme needs to address both the high level issues raised in this report, and the more detailed process issues.

3.2.1 Comments on section 6 Evaluation of the PBS scheme process.

This section of the report does not really evaluate the PBS process in any depth. It discusses a number of aspects of the PBS process, but does not discuss the functioning of the PBS process as a whole.

HVIA has identified a range of issues related to the PBS certification process that have been raised with the NHVR. These include:

- Issues related to static rollover thresholds;
- variations on designs; documentary requirements;
- component substitution, modifications of designs after approvals;
- interaction between PBS, vehicle modifications and roadworthiness and auditing.

These issues are all related to PBS processes and have not yet been addressed by NHVR.

There is more generally a need for improved auditing of the PBS process. The auditing should focus on both ensuring that the various scheme participants, such as assessors and certifiers, are doing their job correctly, but, also address the issues over consistency of advice from regulators. If moves are made toward self-certification by manufacturers, the auditing processes will also need to include these activities.

The report does discuss the gap between the access that is currently available under the PBS scheme, and the original intention of the scheme. This represents a significant departure from the original agreement by Ministers when the scheme was first established. The report notes that this is the case, but does not identify the underlying reason.

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The central reason that PBS access has not worked is that road managers have not accepted that the compliance with the asset protection components of the PBS standards will indeed result in the PBS vehicles causing no more damage than the equivalent prescriptive vehicles. In addition, road managers giving consent often do not adhere to:

- the time limits for responses under the Heavy Vehicle National Law
- the HVNL requirement that road managers may only decide not to give consent to access where the access will result in damage to infrastructure, loss of public amenity or safety issues and it is not possible to apply road conditions or travel conditions which will avoid or significantly reduce the impacts.

Ideally the report should have analysed the reasons that road managers have departed from the agreement obtained from Ministers and contained concrete suggestions to address these issues. There is some discussion of issues related to this under section 7.4, which looks at key barriers to innovation and take up, which suggests that Road managers are using factors other than those they are required to do by the law.

In this section, the report also discusses permit turn around times. HVIA agrees that long and costly approval processes excessive use of Permits instead of notices and uncertainties over access are hampering take up of the PBS scheme.

HVIA is concerned that using average approval times as a measure of PBS scheme performance is misleading. Analysing the performance of the scheme also requires measures that recognise the longer turn around times for some applications. This is important because the costs to industry rise significantly as the length of the time required to obtain approval increases

3.2. Comments on Section 7 Evaluation of Scheme Outcomes

This section of the report not only looks at the overall outcomes of the scheme but, also in section 7.4, looks at barriers to innovation. In section 7.5, identifies a number of opportunities to improve the effectiveness of the scheme. These opportunities are then reflected in the possible actions in section 8.

3.2.2 Comments on Section 8.1 Proposed Actions

This section repeats the proposed actions suggested in the report in italics and then provides HVIA comments (indented). HVIA is keen to work closely with the NTC and the NHVR on the further development of the implementation of the proposed actions.

Review the PBS framework and the standards to improve productivity, safety and the precision of matching vehicles to roads. The task includes the following items:

Review current PBS standards (Standards and Vehicle Assessment Rules and Network Classification Guidelines) to identify changes that could further improve safety of PBS vehicles. The task is to assess if safety can be

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demonstrated by use of modern technology and include them as deemed-to-comply provisions. Upgrading standards to what is the modern industry standard will improve safety performances of PBS vehicles and encourage vehicles to use modern technology to demonstrate safety.

Review how new PBS applications report the performance results of vehicle designs. Identify how reporting can be restructured to better optimise vehicles to the freight task and the roads they intend to use.

Amend the HVNL and supporting legislation to include additional ADRs and HV(MDL)NR from which PBS vehicles can be exempted.

Develop permanent pavement vertical loading standard to replace current interim standard. Follow on from the framework delivered as part of the Austroads project AP-R541-17.

Review recommendations from relevant Austroads publications and prioritise these for inclusion in the forward work program.

This work could be undertaken by the NTC/NHVR.

HVIA supports the review of the PBS framework and standards. In particular, HVIA is keen to see the braking standards updated to reflect the improvements in braking standards being considered in ADR 35 and 38. HVIA would like to see specific details in relation to deemed to comply provisions. The evidence outlined in this report indicates that the existing deemed to comply provisions with respect to braking have been used by truck and dog operators to allow older trucks to achieve productivity benefits at the expense of the safety outcomes the PBS scheme was intended to produce. Any deemed to comply provisions need to enhance safety not reduce it.

HVIA supports the transparent reporting of performance results in PBS applications. Providing greater transparency assists both operators and road managers to understand the impact of these vehicles on safety and productivity.

HVIA would support the establishment of a working group to look at targeted exemptions to some ADRs to support the PBS scheme. These exemptions need to clearly articulate the performance standards that vehicles obtaining exemptions should meet. For example the use of non-ADR compliant Axle groups requires further consideration (e.g. Belly Axles). However, there are significant issues related to the PBS standards and PBS scheme rules that need to be addressed to progress these issues. HVIA and its members would be keen to engage in the further development of these concepts.

HVIA supports the development of more effective approaches to assessing pavement loading. This is a complicated issue with HVIA and its members keen to have a role in progressing this issue. HVIA also believes that the PBS framework and standards related to Bridge Loading are an area requiring considerable work. It appears that road managers have not accepted that the existing PBS standards in relation to infrastructure protection are adequate and have restricted PBS access more than was originally anticipated when the scheme was set up. For the PBS scheme to work effectively, it is imperative that road managers accept the principal that PBS vehicles do no more damage to infrastructure than the prescriptive vehicles they replace. In order for them to accept this, the infrastructure managers need to be closely involved in the development of the related PBS Standards.

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Investigate the need to develop a simplified PBS scheme for popular and mature PBS designs backed by greater access certainty. The NTC also suggests industry body's take the lead in developing blueprints for popular PBS vehicle types. This will allow greater PBS vehicle uptake. The NTC believes that industry bodies are better suited to this task.

HVIA supports providing streamlined approval processes for popular and mature PBS designs. Furthermore HVIA supports the approach currently being taken by Vicroads whereby a sensitivity analysis is undertaken for key infrastructure assets against a range of potential PBS design parameters (mainly in relation to vehicle length and axle spacing parameters). This approach provides greater access certainty for operators and manufacturers using designs that fall within the envelopes used for the analysis.

HVIA will not get involved in developing PBS blueprints. Many HVIA members have already developed "blueprint" designs at considerable cost that are available to their customers wishing to get involved in PBS. This minimises the costs for companies wishing to buy new vehicles to enter the PBS scheme. These members have been the organisations that have championed PBS in its early stages. There is no evidence that there is a shortage of available designs for common types of PBS configurations. It would not be appropriate for HVIA to undermine its members by developing its own blueprint designs.

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

In principal, HVIA supports the publication of national notices. However, last years national truck and dog notice was an example of how not to do this. It is essential that national notices do not take the "lowest common denominator" approach and focus on getting out a national notice for the sake of being seen to do so. Last years truck and dog notice was a huge problem because it restricted access to a much smaller subset of routes than was possible under the pre-existing state based notices

Any future notices need to guard against repeating this problem. The general principal should be that if a particular vehicle is able to access a route under a state based notice or permit it should have the same lever of access under the national arrangements.

The publishing of national notices needs to focus on opening up access to PBS vehicles and promoting best practice safety principals. For every national notice NHVR needs to undertake an analysis of the access available to various vehicle combinations prior to the issue of the notice and an analysis of the access that will be available after the notice is published. NHVR need to ensure that the level of access to any vehicle category is not reduced by the publication of the notice.

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

HVIA is supportive of changes designed to improve the assessment processes for infrastructure and is keen to be consulted in the development of the framework. However, developing a national harmonised infrastructure assessment methodology should not focus on uniformity at the expense of

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access. Jurisdictions that currently adopt a more open access policy should not be forced to adopt a more restrictive approach for the sake of uniformity.

HVIA is supportive of the idea of developing a publically accessible database (or databases) of bridge capacity information. HVIA would encourage road managers to undertake analysis of key bridges in their networks against a range of popular PBS designs to streamline future access applications. The approach being taken by Vicroads for its High Productivity Freight Vehicles network may be a useful model.

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.

Current HVNL and HV(MDL)NR would only be used if the heavy vehicle did not meet the PBS requirements. Implementation options and enforcement framework to be developed after the agreement to develop a RIS.

This work could be progressed by the NTC.

It is not clear what is intended by this suggestion. Current registration schemes focus on registering individual vehicles not combinations. The PBS scheme currently applies to PBS combinations. It is not clear whether this suggestion is meant to apply to combinations over 42.5 tonnes or individual vehicles over 42.5 tonnes. If it is intended to apply to individual vehicles it is not clear how this would work. This proposal requires further work before NTC could consider undertaking a regulatory impact statement. HVIA is happy to work with NTC on further development of this concept to see if the approach is viable.

Engage with non-road infrastructure owners to identify the costs and benefits or 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.

This work could be progressed by the NTC/NHVR.

HVIA supports this approach

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

This work could be progressed by the NTC.

It is not clear what this suggestion is trying to achieve. With respect to Medium to Heavy Commercial Vehicles, the vehicles currently in this category are technically covered by the PBS level 1 standards which (should) allow general access. However, some of the current standards may not be relevant to rigid vehicles. It may be that some exemptions to non-relevant PBS standards for rigid vehicles could be introduced to simplify the process of giving these vehicles access to PBS.

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These issues should be addressed as part of the review of the PBS standards. HVIA and its members would be keen to engage in further scoping of this proposal

With respect to busses there may be some merit in applying PBS standards particularly for longer and articulated busses. Again this needs to be addressed as part of the review of the PBS standards.

3.2.2 Comments on Section 8.2 Suggestions for Consideration by NHVR and Road Managers

This section repeats the proposed actions suggested in the report in italics and then provides HVIA comments (indented). HVIA is keen to work closely with the NTC and the NHVR on the further development of the implementation of the proposed actions.

The NTC encourages the NHVR and road managers to consider the following suggestions.

Encourage local governments to approve the use of PBS vehicles as a better alternative to prescriptive vehicles.

To achieve this, the NTC/NHVR will need to work with road agencies to promote to local councils the benefits of using PBS vehicles and an understanding regarding the impacts of operating PBS vehicles. Almost every freight task includes first and last mile road networks for which local councils are road managers. It is essential that they are able to make fully informed access decisions.

HVIA supports working with local government to increase the benefits the PBS scheme offers to the community.

Develop nationally harmonised operating conditions for different PBS vehicle types, network levels and mass limits for use in both state and local roads. Identify and eliminate network connectivity gaps at borders to enable operators to continue to move freight without having to make changes at the borders.

HVIA is generally supportive of this suggestion but reiterates its comments that it is important to ensure that harmonisation of operating conditions enhance access for PBS vehicles, not reduce access. HVIA is also keen to ensure that any conditions applied actually enhance safety and protect infrastructure. Some conditions (for example different speed limits for PBS vehicles compared to conventional vehicles may increase risks)

Substitute existing in-principle assessments by issuing permits with a delayed start date unless there are unacceptable levels of changes in vehicle design, mass limits, routes or PBS safety and infrastructure performances. This will eliminate access uncertainty for operators and encourage them to invest more thought in their vehicle design prior to requesting in-principle access approval. It will also remove some of the administration burden on the NHVR and road managers by reducing the number of unnecessary in-principle assessments.

This proposal requires further development. It is not clear how this would work and the benefit to operators is also not clear.

Accelerate the development of the strategic freight network and work done on major and popular highways (Hume and Pacific highways) to simplify the task of managing heavy vehicle access for road managers. This often means lesser bridges to fix and minimum pavement to repair. Risk based operating conditions such as

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Intelligent Access Program – Mass (IAP-M) will allow the live load factor to be reduced to allow safer and more productive vehicles to use a broader network.

HVIA supports development of the strategic freight network but is cautious about recommendations based on IAP. There may be other more cost effective approaches that can be used.

Address the lengthy and expensive PBS approval process. Industry suggestions include developing a means to allow prospective applicants to self-assess their innovations against PBS requirements, and developing a centrally managed database for heavy vehicle components. (The Australian Tyre Industry Council is currently working with the NHVR to develop a centrally managed database for PBS tyres – see Appendix K.)

Assessing performance of designs against the PBS standards is a complicated issue requiring appropriate expertise. Component substitution is also a complex issue due to the potential impact on the performance of PBS designs. HVIA is supportive of the development of a centralised database of tyres and suspensions that contains reliable and reputable performance data. However, it is essential that there are controls in place to ensure the data that is in the database is reliable. Working through these processes requires that a range of perspectives from different parts of the industry are taken into account. HVIA is keen to ensure that whatever systems are set up are robust and reliable. HVIA has members with experience in all aspects of PBS who would be able to help ensure that the systems that are set up are suitable.

The NTC notes a number of survey respondents are concerned about the inconsistent advice provided by the NHVR call centre for PBS permit applicants. Industry also reported that in some instances this has led to inconsistent and subjective decision making to PBS permit applications.

HVIA also has concerns about inconsistency in advice provided with respect to PBS applications. HVIA has made a number of suggestions on improvements to the certification process in particular and is keen to work closely with the NHVR on improving the PBS process.

4.0 Conclusion

HVIA has a large number of members engaged in various aspects of the PBS scheme. PBS has driven a considerable amount of innovation in the heavy vehicle sector and the ongoing success of the scheme is of critical importance to our members. This discussion paper identifies the benefits the PBS scheme has produced since its introduction and makes some useful suggestions for ways to improve the PBS scheme. However, most of the suggested actions are quite general and will require further work to develop detailed recommendations.

HVIA and its members have already thought through many of these issues at a greater level of detail than is covered in this discussion paper.

HVIA is keen to ensure that its members are closely engaged in the future development the PBS scheme. HVIA is committed to working with the NTC and the NHVR on sensible steps to enhance the scheme.

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