

3 March 2023

PBS Review Project Team  
National Heavy Vehicle Regulator  
[PBSreview@nhvr.gov.au](mailto:PBSreview@nhvr.gov.au)

Dear Review Team,

**CCAA SUBMISSION: PERFORMANCE BASED STANDARDS 2.0 Discussion Paper November 2022**

Cement Concrete & Aggregates Australia (CCAA) is the peak industry body for cement manufacturers, concrete suppliers and extractive operators throughout Australia. Collectively known as the heavy construction materials industry, CCAA members operate cement manufacturing and distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout the nation to meet Australia's building and construction needs.

These materials are vital to delivering the infrastructure required to support Australia's built economy which underpins the development of our nation's physical infrastructure, generating approximately \$15 Billion in annual revenue and employing 30,000 Australians directly and a further 80,000 indirectly.

Most of the material produced by the industry is transported via heavy vehicles (with a minor proportion transported by rail, and with some cement clinker transported by ship via ports) and in relatively short distances in urban and peri-urban areas (eg under 60km per delivery for aggregates and under 15km for pre-mixed concrete). There are about 100,000 average heavy vehicle movements in Australia per day (usually during daylight hours) relating to our industry. Our industry contributes up to 10% of total road freight by volume and operates a fleet of some 6,500 concrete agitators, 2,500 tippers and 1,200 cement tankers.

***Overall Perspective on Performance Based Standards (PBS)***

As outlined in the Discussion Paper, the introduction of PBS vehicles has been an important initiative to allow for safer and more productive vehicles and resulting in a reduction in the number of truck movements over time.

Whilst there has been significant improvement over the years (and we commend the NHVR for their efforts) our industry believes significant improvements can continue be made, particularly in relation to access permits.

In some parts of Australia, the decision-making process for access to suitable routes for our industry can still be prescriptive and inflexible, and road managers still do not necessarily have a high degree of expertise with heavy vehicle classifications, despite the NHVR having this detailed understanding of the many heavy vehicle types. As NHVR is aware, this can complicate and protract access decisions, causing lengthy delays.

Furthermore, there is still inconsistency across States and Territories. For example, our members have reported that Queensland needs better access to HML routes and the HML network in QLD is still very

restrictive compared to New South Wales and Victoria. In Queensland, industry is still required to operate under IAP (extra costs) and NHVAS compared to Victoria where industry can access the HML network under GML and not required to be part of any heavy vehicle scheme - NHVAS, Truck Safe etc. Reasons for access refusal are broad and varied, and first and last mile issues are a major barrier to an efficient freight system for our sector, particularly in relation to access to quarry sites and premixed concrete plants at (usually in industrial zones in outer urban areas)

Unfortunately, there remain significant difficulties in accessing routes off the B Double network. In addition, Truck and Dog level 2 PBS access still requires Permit applications to be submitted when wanting to operate off the gazette network. This creates delays for industry and customers, requires more heavy vehicles on the road each day and or reduces the incentive for industry to purchase these safer combinations.

In summary, whilst there appears to be good will for improvement, and the NHVR has worked hard with road managers and other bodies, there is still much room for positive change. Our members have provided very positive feedback about the NHVR Portal and have been briefed on future improvements.

### ***Comments on Discussion Paper***

In principle, we are supportive of most of the proposals set out in the Discussion paper and its aim for the PBS system to be a contemporary framework that supports the next generation of innovative vehicles delivering a more efficient and sustainable freight task.

The key piece of feedback we have received from members their major concern about the PBS system relates to permits and access routes.

Whilst the vehicle approval process is important, the main issue relates to working with the NHVR and Road Managers to educate key decision makers about PBS, build their confidence and understanding of PBS heavy vehicles, so that more routes can be open, in quicker time. If the Discussion paper's proposals about standardised and streamlined the vehicle approval process lead to improvements in the permit approval process for access, then we would be very supportive.

A big frustration has been tyre framework (restricting brand tyres you could be used), and we support recent changes in this area.

Similarly, the following quote from one of our member representatives highlights difficulties which we hope the reform proposals in the Discussion Paper will address:

“Surely for something fairly ‘standard’ like truck and quad combinations there should be some loose guidelines as far as overall length, length of drawbar, wheelbase and axle spread etc and as long as a combination falls inside the envelope for the key dimensions they could get approved for a consistent mass. Currently we have a Mack Truck & Quad rated to 57.45T and Kenworth Truck & Quads rated to 57.5t. They are all just under 19m and extremely close in the dimensions. Having to get individual vehicle approvals/signoff by an NHVR engineer is unnecessary”.

We agree with NHVR that there is an opportunity to improve the standards amendment process to promote greater flexibility, speed of execution and proactive change, and to ensure policy and administration is owned and managed by the NHVR and its stakeholders.

As such, we would support a framework that uses templates (based on common and mature PBS vehicles), where both PBS and non-PBS vehicles meeting the specifications could be granted greater levels of access and productivity under notice (i.e. permit-less access). Ideally this template approach could help circumvent some of the design approval and vehicle certification processes in the PBS scheme. These outcomes will improve industry and government confidence and enhance the appeal of PBS as an alternative to the prescriptive fleet.

CCAA endorses efforts to bring about more improvement of both assessor and certifier capability, as well as reducing administrative and regulatory burden for industry. This would support confidence in the PBS scheme. Changes in assurance processes (including enabling external parties to manage certain NHVR operational functions under a formal delegation arrangement) may support this but would need to be designed carefully to ensure there were no unintended consequences.

It is particularly vital to ensure that the PBS scheme fosters innovation, and allow future PBS vehicles to be safer, cleaner and more productive. There is a need for continuous improvement, and continued engagement and trusting collaboration between industry, NHVR, road managers and other relevant authorities.

Thanks for the opportunity to provide feedback as part of this process. To discuss further, contact Aaron Johnstone at CCAA on 0439 955 020 or email [aaron.johnstone@cca.com.au](mailto:aaron.johnstone@cca.com.au)

Yours sincerely



Ken Slattery  
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