

Volvo Group Australia submission to
**Draft HVNL Amendment Bill and
Regulations**



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Introduction

Volvo Group Australia (VGA) would firstly like to commend the NTC for all of the work it has done in order to progress to the current Draft HVNL Amendment Bill and Regulations. We were delighted to see so many of the proposed changes had a focus on increasing productivity, efficiency, safety and environmental benefits, which are needed to meet Australia's increasing freight task and emission reduction targets and to overcome driver shortages.

Please see below comments and recommendations from Volvo Group Australia, noting these are mostly focused on the vehicle policies and regulations proposed. We have chosen not to comment further on the proposed enforcement areas given this is not our core business. In principle however, where the NTC's proposals support and promote increased safety, efficiency and cost and administration reductions we view these as very positive steps for the heavy vehicle industry, which currently faces the major challenge of a growing freight task at the same time as a nation-wide driver shortage.

About Volvo Group Australia

Volvo Group Australia (VGA) has more than 1,600 local employees, and manages the manufacturing, distribution and operation of Volvo Trucks, Mack Trucks, UD Trucks, Volvo Bus, Volvo Penta marine and industrial engines, Volvo Construction Equipment and Volvo Financial Services.

Since 1972 VGA has produced more than 80,000 Australian Made Volvo and Mack trucks, and today are Australia's largest vehicle manufacturing powerhouse. Every truck built at our Wacol, Queensland facility carries official 'Australian Made' certification. In recent years, on average approximately one third of all heavy-duty trucks, and 40% of all heavy-duty buses delivered into the Australia market are Volvo Group Australia brands and products.

Globally Volvo Group has a target of net zero value chain emissions by 2040 - ten years earlier than the Paris Agreement and Science Based Targets initiatives (SBTi) commitments. This will enable our customers to have zero emission fleets by 2050, which is also essential on the journey for achieving Australia's targets of reducing greenhouse gas emissions to 43 per cent below 2005 levels by 2030.

Key comments and recommendations

- **General Mass Limits (GML) allowed for heavy vehicles will be increased to match the current Concession Mass Limits (CML).**

Volvo strongly supports this recommendation that will further simplify and streamline General Mass Limits across the country. GML and CML rules can be somewhat confusing and unclear for operators so this change will definitely be welcomed by industry.

- **Increasing heavy vehicle length 19m to 20m**

Volvo again strongly supports this recommendation that, as highlighted already by the NTC, will have a number of benefits including most notably productivity gains that in turn improve efficiency and total cost of ownership calculations for operators. As flagged by the NTC, the additional metre will also provide opportunities for enhanced in-cab driver amenities and/or sleepers, which may also assist with driver attraction and retention.

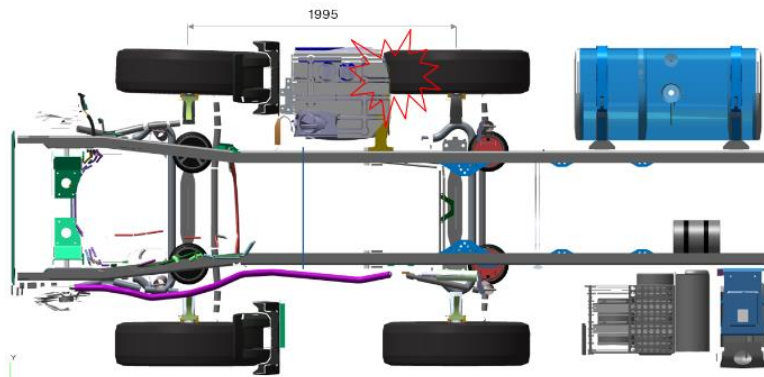
>>> One recommendation from Volvo is to ensure flexibility on where/how the additional metre is utilised i.e. cab or trailer, as different operations and applications will have different preferences. For example, city/metro delivery operators and local/regional haul operators will likely place greater value on the trailer length, while interstate and long-haul operators may get more value from an increased cab length.

Please do not hesitate to contact us if you would like any further information regarding swept path data for heavy vehicles.

- **Increasing twin-steer axle spacing from 2.0m to 2.5m to support Euro VI**

Volvo would like to thank the NTC for understanding and supporting this issue, that impacts not only VGA but also other OEMs in the industry.

Technically a larger muffler is required in order to meet the more stringent Euro VI emission regulations. Unfortunately, for many OEMs the current twin-steer axle spacings regulated in Australia do not provide enough space for this enhanced muffler. Please refer to chassis drawing below for visual example of this issue.



This relatively minor change proposed to the axle spacing that has no, or extremely minimal, impact on things such as pavement wear and bridge impact but will allow Australia to access the full Euro VI model ranges from industry suppliers.

- **Access authorisation by notice / permit**

One of the most exciting items in the NTC's draft submission was the fact that the NHVR has set a goal of targeted elimination of permits and a future where permits are required by exception rather than a rule; and similarly, that ITMM has also set a 50 per cent permit reduction target in three years and 90 per cent in five years.

This will be a major game changer for the industry, significantly reducing administrative costs and resources. Ideally, this is also the result of much clearer, simplified and streamlined access rules and regulations, and the utilisation of notices where possible / required.

>>> One major area that can further assist with this improvement is National Harmonisation on vehicle and permit regulations and requirements. The freight and logistics industry by its very nature is not bound by jurisdiction borders, but differing regulations across the country are creating them.

- **Modernising General Access**

As detailed in the NTC's submission, despite the fast-growing national freight task and improvements in vehicle safety over time, this has not been reflected in expanded general access. Most general access limits have not changed since the 1990s. However, considerable advancements in the heavy vehicle fleet have not only made them safer (e.g. braking, vehicle stability systems, lane departure warnings, emergency braking, adaptive cruise control etc.), but also less impactful on roads, pavements and bridges (e.g. tyre technologies, wider tyre options, road friendly suspension etc.).

As the industry continues to advance, and also access new technologies such as Battery Electric, and Hydrogen Fuel Cell Vehicles, progress and advances in modernising General Access and increasing weight limits will be essential.

Conclusion

In addition to preparing this feedback, VGA has also worked closely and provided input to the Australia Logistics Council (ALC) in the formation of its response, and therefore also endorse their submission.

VGA is committed to working closely with government and industry stakeholders to delivery optimal outcomes for the industry – not only now but also in preparation for future heavy transport demands and advancements. Please do not hesitate to reach out to us if you require any further information or wish to discuss any of the feedback provided in more detail.