



NATIONAL ROAD TRANSPORT ASSOCIATION

Submission to Level 5 Design on behalf of Austroads

Vehicle Classification System - Review

17 February 2021

Introduction

1. The National Road Transport Association (NatRoad) is pleased to provide feedback on a number of issues raised in an Austroads project to update the 1994 current Austroads Vehicle Classification Scheme. The aim of the review is to identify areas where the scheme could be updated to better reflect the current and future vehicle fleet.
2. NatRoad is Australia's largest national representative road freight transport operators' association. NatRoad represents road freight operators, from owner-drivers to large fleet operators, general freight, road trains, livestock, tippers, car carriers, as well as tankers and refrigerated freight operators.
3. This submission responds to the questions posed by Level 5 Design on behalf of Austroads.
4. We offer the specific feedback set out below whilst noting that vehicle surveys are welcomed where data is generated which drives risk-based regulation and informs governments on matters such as road investment decisions. The data obtained, however, must protect drivers' and operators' rights. The protection of those rights and the need for different protocols to apply where data is used for enforcement as against other purposes are priorities of NatRoad members. Technology and data use under the Heavy Vehicle National Law (HVNL) must be instrumental: technology should be used to facilitate compliance with performance standards and to improve safety. A central aim should be to ensure all heavy vehicle operators proactively manage transport safety risk.

Q1: What are the key limitations of the current scheme?

5. Vehicle types and combinations have expanded significantly since 1994. The current system of classification is clearly out-moded. Any vehicle classification system should be able to guide access for vehicles and manage use of the network. The current system is unable to do this and where possible in respect of heavy vehicles must be better aligned with the National Heavy Vehicle Regulator's (NHVR) scheme for classifying vehicles¹ inclusive of Performance-Based Standards (PBS) vehicles.²

Q2: What classification levels are missing?

6. NatRoad member feedback is that the issue is not missing classification levels, rather that the other important factors cannot be identified i.e., length is not the only important variable. Three factors predominantly define vehicle classifications: length, axle numbers, and coupling types at articulation points for articulated vehicles (but see the response to question 6 below for other variables used in assessing access for heavy vehicles). The current system of length classification deals only with one of these defining concepts. Member feedback is that the number of axles in a heavy vehicle combination is an important parameter to measure, as its axles that apply loading and wear to roads.

Q3: What vehicle classes are not represented?

7. PBS combinations and special purpose vehicles are not accurately classified via the current system. As indicated in the response to Question 1, the classification system needs to better align with the current heavy vehicle classification system.

¹ <https://www.nhvr.gov.au/road-access/mass-dimension-and-loading/classes-of-heavy-vehicles>

² <https://www.nhvr.gov.au/road-access/performance-based-standards>

Q4: How could an extended scheme accommodate over the horizon challenges?

8. The optimum system would enable an access regime managed by vehicle classification rather than the individual permit system used extensively currently to enable heavy vehicle access. The new system should be designed to facilitate better heavy vehicle access arrangements.

Q5: What are the emerging technologies that a revised classification scheme should accommodate?

9. Emerging technologies should be able to provide a far more granular identification of vehicle types/combinations than the simplistic length classification. Indeed, if Mass/Distance/Location charging for heavy vehicles is introduced³ because this system will be based on onboard reporting devices the need to count vehicles is much less crucial. To the extent that the new system could operate as a tool to assist the development of access then the new classification system would need to be more about what are the access requirements or challenges to overcome or manage and less about the vehicle's length.

Q6: What type of measurements should be used in the new scheme?

10. On the assumption that a revised classification system should better link with heavy vehicle access the following should be measured:
 - i. Overall length
 - ii. Number of axles
 - iii. Width
 - iv. Height
 - v. Low speed swept path (probable or actual)
 - vi. Gross mass
11. Given that there is presently in contention a Future Fuels Strategy⁴ and the current classification system does not distinguish between vehicles powered by different fuel types, measuring the number of electric vehicles and/or vehicles powered by different fuel types would be useful for Government and industry.

Conclusion

12. NatRoad supports the re-framing of the outmoded vehicle classification system currently in place. The emphasis should be on making the system more compatible with heavy vehicle classifications and linking it to reform of heavy vehicle access arrangements.
13. NatRoad would be pleased to discuss this submission with the consultants.

³ This would be an outcome of the Heavy Vehicle Road Reform process currently underway <https://www.infrastructure.gov.au/roads/heavy/background/phase-one.aspx>

⁴ https://consult.industry.gov.au/climate-change/future-fuels-strategy/supporting_documents/Future%20Fuels%20Strategy%20%20Discussion%20Paper.pdf