QTLC RESPONSE TO THE MAY 2024 NHVR PAPER PERFORMANCE STANDARDS – REMOVING ROADBLOCKS TO REFORM

The Queensland Transport and Logistics Council (QTLC) welcomes the opportunity to comment on, and contribute to, the paper "PERFORMANCE BASED STANDARDS Removing Roadblocks to Reform" ("Paper"). The QTLC supports the recommendations of the NHVR paper to make changes to the PBS Scheme to allow it to better meet its objectives.

The QTLC agrees with the essential thesis of the paper that PBS has effectively stalled and is no longer meeting its objectives as well as it should.

QTLC comments are informed by the Port of Brisbane (Pty Ltd) (PBPL) response to the Discussion Paper "Assessing the Effectiveness of the PBS Scheme' dated August 2017. The PBPL submission outlined the benefits to the Port of Brisbane and its stakeholders resulting from the uptake of high productivity PBS vehicles, the impact these vehicles have had on rail's share of container transport, and highlighted inadequacies in PBS processes.

Although the 2017 response is now dated, many of the issues outlined in "Roadblocks to Reform" were also canvassed in PPPL's 2017 submission, albeit at a more micro level.

PBS Objectives

The objectives of PBS which were outlined by COAG many years ago ie, improve freight productivity, reduce vehicle emissions and CO2, and reduce road trauma and congestion, are even more valid now than they were then. A component of productivity is reducing the need for drivers, an important aspect now, given widespread driver shortages.

Reducing emissions also now has a much higher priority than it did when the PBS Scheme's objectives were set, given the increasing contribution of trucks to total transport emissions, and recent initiatives to introduce electric and hydrogen trucks to lower emissions.

The same case can be made for road congestion. Road congestion on South East Queensland (SEQ) roads, including major freight routes, is now far worse than it was when the PBS objectives were set.

Although the NHVR paper focuses on the benefits of the PBS Scheme, it needs to be stated that a more effective way of achieving COAG's objectives is to increase rail's share of freight transport. Rail's impact on reducing emissions and road congestion would be much greater than increasing the number of PBS vehicles. Unfortunately, PBS vehicles can have the unintended effect of reducing rail's share. An example of this is the adverse impact of PBS 4 TEU A doubles on rail's share of the transport of containers

from west and south west Qld to the POB (now zero). The PBS A double was not the only reason for the demise of rail, but it certainly contributed (refer the 2017 submission).

Rail's share of the increasing freight task to 2050 is projected to increase by 5.7%, but this will be outstripped by the corresponding increase in road freight of 76%. In the absence of a significant increase in rail's share, improving road freight productivity is clearly more important than ever.

The Problem of Access

The paper rightly identifies that the difficulties operators have getting access to the road network for PBS vehicles is a major reason why the use of PBS vehicles has effectively 'stalled'.

The introduction of Heavy Vehicle National Law (HVNL) and the establishment of the NHVR in 2014 ushered in a new legislated role for road managers. The most important change was that road managers became responsible not only for the roads they control, but also the safety of those roads. This was a significant change which most road managers, especially local councils and private road owners eg, (ports) were unprepared for.

Since February 2014, road managers have been required to approve access for PBS vehicles to their roads. They are not only required to assess the capacity of their roads to accommodate PBS vehicles, they also must assure themselves they are safe on their roads.

This has added a level of complexity, increased costs and additional time into the process of getting PBS vehicles on the road and is arguably the major reason current arrangements regarding access are no longer fit for purpose.

In addition, road managers are not required to consider the impact of PBS vehicles on productivity, emissions or congestion, even though in many cases they probably do. Notwithstanding, there is therefore a misalignment of objectives between transport operators and the NHVR on the one hand, and road managers on the other. Is it any wonder there is a disconnect/conflict?

The result of this is the lack of access certainty. Operators will not take the risk of building a PBS vehicle unless they are confident it will get access to the road network. The extra cost of permits is also an impediment.

The NHVR paper recommends changes in legislation to overcome some of the impediments to a greater take up of PBS vehicles. A legislative change to align the incentives of road managers, operators and the NHVR would be a logical first step.

Project London

The PBS Scheme has allowed the recent development of an innovative, bespoke, Australian-designed and built two and three trailer Super b Double-like vehicle designed

to carry empty containers ‘double stacked’ on Port of Brisbane (POB) roads (Project London).

This is the first genuinely port-focused innovation in vehicle design at the Port of Brisbane since the introduction of the 4 TEU super b double in 2002. The super b double was a runaway success because it doubled vehicle productivity of container transport compared with existing vehicles.

The London vehicle has a similar impact on vehicle productivity by going higher rather than longer.

The development of the London vehicle demonstrates not only the value of the PBS Scheme in facilitating innovative vehicles, but also the road manager’s role in facilitating access.

Access to Port of Brisbane roads is controlled by the Port of Brisbane Pty Ltd (PBPL) as the road manager.

The transport of empty containers to and from the stevedores and empty container parks at the port is a substantial task, as substantial as the transport of full containers. It is thus beneficial for productivity if the number of trucks involved in this task could be reduced. The productivity advantages of a vehicle carrying twice the number empty containers are obvious. The London vehicle proffered an opportunity to not only reduce the number of vehicles required for the task, but also reduce emissions and congestion on port roads. And importantly, costs.

The POB’s approach was critical to the success of this vehicle. POB was required to assure itself that the vehicle was safe on port roads, would not adversely impact other road users and would not damage port infrastructure. The vehicle operator was told at the start that if the vehicle was assessed as being safe and could be safely accommodated on port roads without adversely affecting other road users, POB would consent to its access. NHVR was still required to issue a permit.

This allowed the operator to commit funds to develop and build the vehicle knowing that if it met the agreed performance criteria, POB would consent to access. Although the London vehicle was not designed to meet PBS standards (for a start it was too high) PBS standards were used to evaluate it. A significant amount of desk-top and on road assessment was required before the vehicle could be approved and a permit issued, including the development of a specially-designed frame to test the vehicle’s ability to avoid rollover. To facilitate safe access POB upgraded a roundabout and the exit road from one of the stevedore terminals. This was a benefit for all port vehicles, not just the London vehicle.

The involvement of POB from the beginning was critical in allowing it to consent to the vehicle’s access to port roads.

It is worth noting that POB was supportive of the London vehicle because of the benefits it offered:

- It improved freight productivity,
- It reduced truck numbers and congestion,
- It facilitated better utilisation of road capacity.

In effect POB's interests were aligned with the operator.

Removal of Tried and Tested PBS vehicles

The paper makes a compelling case for 'tried and tested' PBS vehicles to be removed from the Scheme, which the QTLC supports. A good example is the 30m PBS A double which was first approved in 2010 and which is now used more widely for the transport of containerised imports and exports than 'as of right' B doubles.

Since A doubles were first introduced, they have become ubiquitous on the roads between the Port of Brisbane and Toowoomba, and because of bridge restrictions on the Warrego Highway, their design and measurements have largely been standardised. There is therefore no reason these vehicles still need permits to access the network, as permits add unnecessary costs on operators.

PBS Standards

The QTLC supports the NHVR paper's argument for PBS standards to be updated to reflect 20 years of learning, and to more easily be able to be changed as technology and vehicle designs change. Practical examples of the impacts of the inflexibility of current standards are as follows:

An A double must be no longer than 30 metres to access the level 2 network, irrespective of its performance. A recent design of an A double was 30.5m long and otherwise met all PBS geometric and infrastructure performance standards. The extra half metre provided substantial productivity benefits which were unavailable in a 30 metre long vehicle. Although the Port of Brisbane consented to access for its roads, TMR did not for its roads (contiguous to the Port). TMR applied a rigid interpretation of the 30m length rule.

Continuing evolution of technologies such as Trailer Electronic Braking Systems allow a vehicle that may struggle to pass existing PBS standards, though having superior safety performance. This is indicative of the need to update PBS standards to embrace new technologies.

Summary

The QTLC:

- Supports the analysis and recommendations of the NHVR paper, especially those which can be progressed quickly and do not require legislative changes.
- Believes the major reason the use of PBS vehicles has stalled are the difficulties associated with getting access to the road network, in large part because of the misalignment of incentives between road managers and operators and the NHVR.

- Supports the removal of ‘tried and tested’ PBS vehicles from the PBS scheme and for the PBS Scheme to be allowed focus more on innovative designs and concepts.
- Supports PBS standards being updated now and made easier to update in the future.

Note: *the QTLC agrees to this submission being made public.*