Submission to: National Transport Commission

Title: Heavy Vehicle Road User Charge Annual

Adjustment

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1. Introduction

The heavy vehicle industry believes in paying its fair share of road maintenance and infrastructure provision costs. However, the annual adjustment which is applied to heavy vehicle registration and the road user charge (RUC) has significant weaknesses. These have been highlighted in the NTC heavy vehicle charges review and have been raised by industry in the previous NTC A-trailer review.

Given these faults, the ATA believes the proposed increase of 2.5% should not be applied. Instead charges should increase in line with CPI.

2. Australian Trucking Association

The Australian Trucking Association (ATA) is the peak body that represents the trucking industry. Its members include state and sector based trucking associations, some of the nation's largest transport companies, and businesses with leading expertise in truck technology.

3. Recommendations

Recommendation 1

Until the parameters in the annual adjustment are updated, the NTC should index heavy vehicle charges to CPI.

Recommendation 2

The NTC and ATA establish and agree on the inputs and methodology for calculating the road user factor (RUF).

Recommendation 3

The RUF factor should be updated annually.

Recommendation 4

The road expenditure factor (REF) 'A' weighting should be updated regularly.

Recommendation 5

Given the NTC review has presented fundamental weaknesses in the annual adjustment methodology, its use should be suspended.

4. Concerns with the annual adjustment

The ATA believes that there are considerable doubts in the functionality of the current annual adjustment process that mean its application to the RUC and registration should not happen in 2013-14.

Road agencies are also well aware of the faults of the annual adjustment and have the choice to either choose revenue or to instigate a fair charge that does not endorse a broken formula.

4.1 ATA solution

Until all parameters of the annual adjustment are updated, results produced from the current methodology are rejected. The future of the annual adjustment is unclear, as the NTC review has revealed.

Until the NTC review RIS proposes options for an annual adjustment, CPI could be applied to industry RUC and registration in the annual adjustment's place. The CPI forecast for 2013-14 is 2.25%. This would be an acceptable charge for road agencies to implement until the future of the annual adjustment has been decided.

We have provided a schedule of what registration charges, the fuel tax credit and the RUC would be under the proposed 2.25% adjustment (Section 5).

RUC would increase by 0.57cpl, to 26.07cpl. The fuel tax credit would be reduced from 12.64cpl to 12.07cpl.

It must be remembered that 2012-13 charges increased the RUC by 10% and increased registration charges by 6-32%. The heavy vehicle industry operates on small profit margins and adding unfair charges will burden industry further.

Recommendation 1

Until the parameters in the annual adjustment are updated, the NTC should index heavy vehicle charges to CPI.

4.2 Non dynamic parameters of the annual adjustment formula

While some parameters in the annual adjustment methodology are updated annually, several have been fixed since 2007 leading to the figure produced by the annual adjustment to be unreflective of how much the heavy vehicle industry should be paying.

Road use factor (RUF)

The road use factor (RUF) should reflect the change in the heavy vehicle cost base due to changes in road use between heavy and light vehicles. While it is described as reflecting 'a change', it has not been updated since 2007 when it was fixed at -1. The data used to calculate the RUF in 2007 was from 1998-2005.

Given that the composition of light and heavy vehicle travel on roads has changed, the RUF must be updated to reflect the changes in the parameters used to calculate the RUF: GDP chain value, Vehicle kilometres travelled and vehicle population figures.

The ATA would like to work with the NTC to establish and agree on inputs into the RUF calculation.

The RUF factor should be dynamic and be updated annually to reflect the change in road use between light and heavy vehicles.

Road expenditure factor (REF)

The REF represents the impact of a change in the four different types of road expenditure.

¹ 2.25% according to the Mid-year Economic and Fiscal Outlook.

The current REF formula is:

0.45 x % change in rural arterial road expenditure +

0.362 x % change in urban arterial road expenditure +

0.119 x % change in rural local road expenditure +

0.064 x % change in urban local road expenditure.

The decimals represent a weighted 'A' factor to reflect the influence each expenditure type on road costs that should be recovered from heavy vehicles. These have also not been updated since 2007. While updating the weighting factors every year may not be ultimately useful, updating the A weighting figures regularly would mean they are more reflective than they currently are.

Recommendation 2

The NTC and ATA establish and agree on the inputs and methodology for calculating the road user factor (RUF).

Recommendation 3

The RUF factor should be updated annually.

Recommendation 4

The road expenditure factor (REF) 'A' weighting should be updated regularly.

4.3 The NTC 2013-14 Determination

The NTC determination casts considerable doubt over the accuracy of the annual adjustment formula. Industry does not believe it is acceptable to impose charges on industry from a process that is under scrutiny.

The NTC review is proposing to overhaul, or at the least amend, the current annual adjustment methodology to improve the PayGo model. Hence, the integrity of the figure produced is doubtful, and its outcomes should not be applied to truck charges.

Given the NTC review, the use of the annual adjustment should be suspended.

Recommendation 5

Given the NTC review has presented fundamental weaknesses in the annual adjustment methodology, its use should be suspended.

5. ATA proposed 2013-14 charges

| | charge \$ | ahawaa ¢ | | _ |
|--|-----------|-----------|-------------|--------|
| | charge y | charge \$ | Increase \$ | change |
| Short combination prime mover | | | | |
| 2 axle | 1164 | 1190 | 26 | 2.25 |
| 3 axle | 4744 | 4851 | 107 | 2.25 |
| 4 axle | 5030 | 5143 | 113 | 2.25 |
| Multi-combination prime mover | | | | |
| 2 axle | 9457 | 9670 | 213 | 2.25 |
| 3 axle | 9457 | 9670 | 213 | 2.25 |
| 4 axle | 10402 | 10636 | 234 | 2.25 |
| 5 axle | 10402 | 10636 | 234 | 2.25 |
| Rigid Trucks | | | | |
| 2 axle: no trailer: 4.5-12t | 542 | 554 | 12 | 2.25 |
| 2 axle: no trailer: >12.0t | 859 | 878 | 19 | 2.25 |
| 2 axle: with trailer <42.5 | 1684 | 1722 | 38 | 2.25 |
| 3 axle: no trailer: 4.5-18.0t | 859 | 878 | 19 | 2.25 |
| 3 axle: no trailer >18.0t | 1021 | 1044 | 23 | 2.25 |
| 3 axle: with trailer: >18.0t <42.5t | 2671 | 2731 | 60 | 2.25 |
| 4 axle: no trailer: 4.5-25.0t | 759 | 776 | 17 | 2.25 |
| 4 axle: no trailer: >25.0t | 1021 | 1044 | 23 | 2.25 |
| 4 axle: with trailer: >25.0t | 3504 | 3583 | 79 | 2.25 |
| Trailers | | | | |
| Pig/Dog | | | | |
| Single axle group | 550 | 562 | 12 | 2.25 |
| Tandem axle group | 1100 | 1125 | 25 | 2.25 |
| Tri axle group | 1650 | 1687 | 37 | 2.25 |
| Quad axle | 2200 | 2250 | 50 | 2.25 |
| Semi trailer | | | | |
| Single axle group | 550 | 562 | 12 | 2.25 |
| Tandem axle group | 1100 | 1125 | 25 | 2.25 |
| Tri axle group | 1650 | 1687 | 37 | 2.25 |
| Quad axle | 2200 | 2250 | 50 | 2.25 |
| B-double lead/B-triple lead and middle | | | | |
| Single axle group | 550 | 562 | 12 | 2.25 |
| Tandem axle group | 2100 | 2147 | 47 | 2.25 |
| Tri axle group | 3300 | 3374 | 74 | 2.25 |
| Quad axle | 4400 | 4499 | 99 | 2.25 |
| Convertor/low loader dolly | | | | |
| Single axle group | 550 | 562 | 12 | 2.25 |
| Tandem axle group | 1100 | 1125 | 25 | 2.25 |
| Tri axle group | 1650 | 1687 | 37 | 2.25 |
| U | 2200 | 2250 | 50 | 2.25 |

AUSTRALIAN TRUCKING ASSOCIATION

| Articulated Combinations | | | | |
|--------------------------|-------|-------|-------|------|
| 6 axle semi-trailer | 6394 | 6538 | 144 | 2.25 |
| 7 axle B-double | 12657 | 12942 | 285 | 2.25 |
| 9 axle B-double | 14407 | 14731 | 324 | 2.25 |
| 12 axle B-triple | 17707 | 18105 | 398 | 2.25 |
| Road train: 2 trailers | 13857 | 14169 | 312 | 2.25 |
| Road train: 3 trailers | 16607 | 16981 | 374 | 2.25 |
| AB-triple | 17157 | 17543 | 386 | 2.25 |
| BAB-quad | 20457 | 20917 | 460 | 2.25 |
| Road User Charge | | | | |
| Fuel tax (cpl) | 25.50 | 26.07 | 0.57 | 2.25 |
| Fuel tax credit (cpl) | 12.64 | 12.07 | -0.57 | |