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# Introduction

An efficient transport system where users pay for utilising infrastructure is ideal in theory; however, presently transport, demands, expectations of services and externalities have arisen which are putting considerable strain on the capacity of the existing infrastructure available. A new way of thinking about transport policy to increase the productivity of infrastructure is encouraged by the ATA.

The population growth which is projected for the next decades means infrastructure will have to accommodate more people, more vehicles and be more responsive to the needs of the population. While the system of charges which is in place for both light and heavy vehicles is functioning, improvements can be made to reflect productive economic aims.

Australia’s spread of population means that additional thought has to be taken when discussing the transport system, as the sprawling nature of the country means pressure is put on heavy vehicle operators and means cars are usually more viable to use than public transport compared to other countries because of the length of travel involved.

The paper points out that many citizens are not willing to pay for better infrastructure. The industry pays its fair share of road use through a road user charge, a registration cost and fuel excise which reflects the damage that a heavy vehicle causes to the infrastructure. Out of all road users, the heavy vehicle industry is the only one paying for its damage to the infrastructure. Other road uses either pay nothing or pay a fuel excise tax not connected to road provision.

The ATA supports ‘good investment decisions and complementary regulatory policies’. The heavy vehicle industry and businesses in general would benefit greatly from improved provision decisions and external review of access decisions.

Furthermore, while the sentiments of wanting to examine the current system on a broader level seem well intentioned, the essentials of what the NTC should provide must not be forgotten in distracting research tangents. Objectives examining things such as social exclusion, physical inactivity and obesity are not the NTC’s concern; neither is providing a fair system of life in Australia. All of these issues should be treated as peripheral to the main aim of the NTC in making recommendations about providing roads and transport to move people and goods as efficiently and safely as possible. The NTC cannot save the world and does not have the mandate to do so.

# The Australian Trucking Association

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

# Recommendations

***Recommendation 1***

***The NTC should encourage more local governments to permit B-doubles and B-triples to access their roads, as this allow communities to be more productive whilst reducing heavy vehicle road wear impact.***

***Recommendation 2***

***The ATA recommend the NTC pursue road agencies to make sure they are aware of the of the contents of the ATA Barkwood Consulting P/L Truck Impact Chart as it show the true impact of heavy vehicles on the road.***

***Recommendation 3***

***The ATA recommends the provision of more rest areas, parking decoupling bays and heavy vehicle road enhancements. Technology should be encouraged for industry when it is fit for purpose.***

***Recommendation 4***

***The NTC should focus on productivity enhancing moves in the heavy vehicle industry as there are many flow on benefits which support economic growth in Australia.***

***Recommendation 5***

***We recommend the NTC see governance of road provision as an area for transformation to provide better outcomes for the nation through improved planning decisions, expertise education and process of review of access decisions.***

***Recommendation 6***

***We recommend the NTC note mass, distance and location charging is not supported by the heavy vehicle industry.***

***Recommendation 7***

***Local governments should have stronger accountability to the Commonwealth and state governments over spending and access decisions.***

***Recommendation 8***

A National Heavy Vehicle Regulator has the potential to increase productivity and treat the heavy vehicle industry’s movements on a national level. We encourage the NTC to pay attention to the outcomes of the NHVR to make sure that the national regulator is not diminished by the state and government amendments.

Recommendation 9

***We recommend the role of technology should be encouraged, but not required for the heavy vehicle industry to operate.***

***Recommendation 10***

The ATA recommends that no congestion charging should be introduced in Australia.

Recommendation 11

The NTC should seek to improve public transports efficiency, frequency and cost-efficiency for residents in cities in order to alleviate congestion.

Recommendation 12

The NTC should focus its attention on providing roads and transport networks to promote productivity and keep Australia moving. Other peripheral concerns are not issues for the NTC and in some cases not issues for government at all.

# Objectives of the NTC’s future plan

The discussion paper has a broad focus of what it sees as objectives for the transport system to address. However, while some of these are desired for focus by the ATA, many are secondary concerns that the NTC should not be expected to solve.

The NTC’s key challenges should be distilled into areas where the success of the NTC is possible. Resources spent on policy and programs that are likely to have limited or negative effect should not be indulged. In this paper there are worrying signs that the NTC sees transport as the cure-all for society’s ills.

Most of the problems mentioned could be alleviated if there was improved supply side initiative such as better educated planners, more responsive maintenance and productivity focussed road provision. Installing a public transport system that suits the modern demands of Australia is paramount to supporting the productivity and the economy of the nation.

* 1. Productivity

The decline in productivity in the heavy vehicle industry has hampered the economy’s ability to grow. Failure to provide capacity for businesses and the industry to develop is one of the major failings of local governments, road agencies and the government.

The industry is competing with the fact that there is high demand for goods to be delivered on tighter deadlines. Many of the comments in the paper stated they desired fewer trucks on the road and more freight moved onto rail, which is just not feasible in many states. So the industry is faced with more demand for its services whilst at the same time having local governments and agencies push for more freight to move to rail. It should be noted that current government cost recovery of investments on the NSW grain line range from 0.8-0.63% of the initial investment[[1]](#footnote-1).

Productivity in the last 20 years has been driven by the industry’s adoption of one of the safest and most productive heavy vehicles, the B-double. On the other hand local governments allowing access to these vehicles has not matched industry and businesses need. Therefore, the productive capacity of businesses that wish to use longer, safer, more productive combinations are limited by the access their local government permit.

Allowing access to these vehicles has tangible productive benefits, below is a table showing the differences in the main combinations used in the industry.

|  |  |  |
| --- | --- | --- |
| Vehicle | No. of trips per 1000 tonnes | Equivalent Standard Axle (ESA) per 1000 tonnes |
| Traditional 3 axle rigid GML | **77** | **316** |
| Traditional 6 axle semi-trailer GML | **42** | **257** |
| Innovative 9 axle B-double GML | **26** | **195** |
| Innovative 12 axle B-triple GML | **20** | **178** |
| Traditional 11 axle type 1 Road train GML | **21** | **202** |
| Traditional 16 axle type 2 road train GML | **15** | **197** |

Source: The ATA and Barkwood Consulting Pty Ltd Truck Impact Chart

B-doubles can move the freight task in 16 fewer trips than a traditional semi-trailer, which means there is reduced wear on the road, shown in the equivalent standard axles column. So if local governments were to allow access to these vehicles there would be less heavy vehicle road wear, increased safety, increased productivity for businesses and fewer heavy vehicles in their jurisdiction.

The NTC has recently recommended local governments allow B-triple access on road train routes, while these vehicles take 5 more trips to carry out the above freight task they are far safer than a road train as there is reduced roll of trailers and less road impact. The NTC has the full support of industry on this move as is the logical decision to make and potentially allows businesses that want to run B-triples the option to do so.

While the industry has been asking for increased access, the Department of Infrastructure and Transport has been engaged in a scheme of improving safety and productivity over the past 3 years by spending $70 million on projects to increase safety and productive capabilities of the heavy vehicle fleet. This scheme is part of the nation building programme.

The areas they have pointed to where productive and safety benefits can be made are:

1. Rest area projects in interstate routes.
2. Parking/decoupling bays in outer urban/regional areas.
3. Technology trial projects, monitoring driving hours and speed.
4. Road enhancement projects, increasing the capacity of roads including bridges.

*Rest Areas*

Fatigue is one of the largest contributors to heavy vehicle crashes. Rest areas are necessary for heavy vehicle drivers to rest due to compliance and to check loads. It is essential they are provided along freight routes. Having more rest areas means there would be more flexibility for operators as they know drivers could travel from A to B with sufficient rest areas. This can only be a positive thing.

The problem is there is a persistent lack of rest areas, even after pressure by the NTC and Austroads on agencies to provide appropriate rest areas. Most states are still not meeting the specified guidelines by the NTC on what rest areas should be provided. With the introduction of the heavy vehicle fatigue laws in 2008 it is imperative governments provide rest areas or operators cannot comply with the law.

An Austroads audit found “major rest areas were underprovided in all jurisdictions, except Victoria. Queensland and the northern territory findings showed that any rest opportunities for heavy vehicle drivers were scarce[[2]](#footnote-2).” Along with this, heavy vehicle rest areas were found to be badly planned and built, and facilities were not provided.

*Parking/decoupling bays*

This refers to larger modular combinations such as B-triples upwards to road trains and AB-triples which normally have to de-couple to access certain roads. While the NTC has recommended governments to allow B-triples to access the same roads as a road trains, it is understandable that some combinations cannot access heavily populated areas or unsealed roads for safety reasons. Therefore, it is necessary these bays are provided in order to make the ease of changing combinations superior than it is currently.

*Technology*

Those who use telematics use it for management reasons and monitoring, but the use of these devices are limited to a section of operators. It is an expensive management tool and money can be spent more productively elsewhere at present.

*Road enhancement projects*

Heavy vehicle road updating and maintenance is in competition with other road provision decisions, as revenue is not separated on collection. If money could be divided and spent efficiently this would be a great improvement on how some agencies perform. Many local governments are not keen to update roads to heavy vehicle standards as they are concerned about the perceived effects of allowing larger heavy vehicles into their jurisdictions has. Safety concerns are ill founded as the B-doubles and B-triples have superior safety over semi-trailers as there is a reduced risk of roll with these safer combinations. National Transport Insurance statistics also show that B-doubles are involved in the lowest amount of multiple vehicle crashes (28%) compared to other heavy vehicles[[3]](#footnote-3).

Impact concerns on infrastructure are not based on sound engineering. Using higher productivity vehicles leads to less heavy vehicles being needed to complete the freight task. This means less impact is made on the infrastructure because of the reduced number of trips needed.

If existing infrastructure could be utilised better and if regulation for heavy vehicles was targeted more towards productivity, allowing higher mass vehicles and more productive vehicles such as B-doubles and B-triples, would mean that little change would be needed to the funding of new infrastructure as it is access which is the holding back the industry, and therefore the economy.

Increasing access and implementing some of the Department of Infrastructure and Transport ideas are endorsed by the ATA and they’d give a good foundation of what physically needs to be provided to improve safety and therefore productivity of the fleet.

The NTC should encourage more local governments to permit B-doubles and B-triples to access their roads, as this allow communities to be more productive whilst reducing heavy vehicle road wear impact.

The ATA recommend the NTC pursue road agencies to make sure they are aware of the of the contents of the ATA Barkwood Consulting P/L Truck Impact Chart as it show the true impact of heavy vehicles on the road.

The ATA recommends the provision of more rest areas, parking decoupling bays and heavy vehicle road enhancements. Technology should be encouraged for industry when it is fit for purpose.

The NTC should focus on productivity enhancing moves in the heavy vehicle industry as there are many flow on benefits which support economic growth in Australia.

* 1. Funding and planning

In the paper it states “Benefits of a well-targeted road pricing scheme aligned with good investment decisions and complementary regulatory policies can address a range of challenges.” Past experience suggests the possibility of a road pricing scheme being implemented is probable, the other two longer run changes to supply side reform are less likely to occur.

The COAG road reform plan (CRRP) focuses on heavy vehicle charges; concerns over supply side provision and maintenance have become primary over pricing concerns. While the industry supports paying its way, the future of charges has to be considered for other vehicles, as heavy vehicles pay for their impact via PayGo and by an annual adjustment; where as light vehicles pay a registration charge and fuel tax at the pump. With the introduction of greener vehicles, which are outside this current taxing system, funding is only going to become more uncertain.

The charges CRRP want to implement that of mass, distance and location (MDL) charging will make funding for road agencies uncertain, as the results of the telematics used to measure each of the parameters will use resources and time to compute as well as working out a charge for each of the different parameters result. Furthermore, rural Australia will suffer as MDL values rural roads to more expensive to operate on than arterial roads. This is going to put the viability of rural Australia in uncertainty. A fuel based charging model would still reflect mass, distance and terrain but would have improved funding structures as money is easily collected from the amount of fuel operators purchase. By CRRP’s own findings the industry favours a fuel based model of charges. The system is simple, non-discriminatory to rural operators and gives certainty to the treasury.

Currently little accountability is seen from local government infrastructure planners, as it is not common practice. Therefore, many projects are not as cost-effective as they could be for the local government constituents and for commonwealth. The NTC should support measures that seek to improve best practice of local governments. Removing bad habits will lead to an improvement of outcomes for communities, such as improved maintenance, better planned road projects and productivity focussed goals for the community. Without intervention the ATA see the possibility of a change in road provision behaviour being very limited.

Local governments complain that they lack funding and this leads to backlogs in projects and failure to provide adequate infrastructure. However, giving more money to local governments will do little to improve planning improvements and from figure 11, the % of GDP spent on road infrastructure is increasing while the same level of accountability, that is very little, has been put onto road providers. There are too many anecdotes of road projects being approved with little responsibility of decisions or audits being required. Better control over standard practice has to be implemented. Without improving the efficiency and accountability of local governments any measures to improve the current road provision system will be blunt in its effect.

Infrastructure Australia (IA) has suggested to COAG that changes need to be made to the culture which surrounds road provision. Indeed at a recent public CRRP forum the ATA were told that it would take 20 years to change the way in which road providers behaved. IA suggests that this kind of conduct has to be weeded out now and replaced with effective, expert planners, who can carry out proper protocol planning decisions.

IA has indicated there is a slow uptake of institutional reform happening within agencies, this needs to change in order for infrastructure decisions to have better outcomes[[4]](#footnote-4). Poor performance and leadership of road agencies is having a considerable effect on productivity. IA is so concerned with the expertise that road providers have, they have provided best practice seminars in order to help rectify the situation[[5]](#footnote-5).

We encourage the advice of infrastructure Australia on the issue of what needs to be done to remedy infrastructure planning and provision. They suggest increased access for productive heavy vehicles, an increase in private sector funding, increased industry consultation and changing the current governance system to achieve the maximum productive potential of road provision outcomes.

1.

We recommend the NTC see governance of road provision as an area for transformation to provide better outcomes for the nation through improved planning decisions, expertise education and process of review of access decisions.

We recommend the NTC note mass, distance and location charging is not supported by the heavy vehicle industry.

Local governments should have stronger accountability to the Commonwealth and state governments over spending and access decisions.

* 1. Regulation

In the paper, the principle of a national regulator is one of the transport policy principles (page 40); this is a main reason why the productivity of the fleet is not reaching its potential. A National Heavy Vehicle Regulator which harmonised regulation for the fleet would make freight movement in Australia far more productive than it currently is.

The creation of a National Heavy Vehicle Regulator is, in theory, a positive step towards increasing the productivity of the fleet by having one regulator and making it easier for operators and drivers to comply with the law. Currently, while national law is set at state and commonwealth level, local governments have the power to amend the regulation set. While the industry has had some consultation with those in charge of NHVR, there is frustration that governments may still be able to amend the regulations, and agencies are refusing to allow the national law to provide external review of decisions. This limits what the NHVR can achieve and ultimately what gains the industry will get out of a NHVR.

The concerns industry has over the NHVR are justified as there are presently cases where state and local governments regulation has not met the requirements that industry expected of it. Performance Based Standards (PBS) was created in order to allow unusually engineered vehicles to meet standards so they can operate as normal heavy vehicles, as they are safe. The rationale for the scheme is to make it easier for businesses that want to use innovative or specialised heavy vehicles. While businesses have complied with the strict criteria set, local governments and state agencies have made the scheme ineffectual as PBS maps, which identify important information such as bridge capacity and rest stops for drivers, have not been provided. Local governments are either not able to identify the routes for PBS maps because of lack of resources or simply are not organised enough to do so.

PBS shows local governments are not providing services businesses have paid for, this failing is huge. The scheme has been operational since 2007 and 80 trucks and buses have registered as PBS as of January 2010[[6]](#footnote-6); and PBS mapping is still not complete. The schemes success would be greater if local governments were able to fulfil their role. The example of PBS shows that if governments do not toe the line, the regulations intentions are undermined considerably.

The success of the NHVR will change the regulatory future for the heavy vehicle industry; this project board should follow the outcome of the NHVR to see if it is going to have the anticipated outcome.

A National Heavy Vehicle Regulator has the potential to increase productivity and treat the heavy vehicle industry’s movements on a national level. We encourage the NTC to pay attention to the outcomes of the NHVR to make sure that the national regulator is not diminished by the state and government amendments.

* 1. Technology

The NTC is correct to identify technology playing a larger role in the future of the transport industry, we note that the ATA has the same concerns that the NTC identifies. We also have concerns that technology is being used as another form of higher regulation costs. While the NTC mentions PBS, the cost of the scheme is expensive and the problems of the scheme mentioned above do not make PBS viable for many operators who want to use PBS heavy vehicles.

In the industry there is still a lot of debate about how the industry should address telematics devices. There is no doubt that for some operator’s telematics are necessary to monitor the fleet. However, at the same time, monitoring puts pressure on drivers and there are concerns over how invasive monitoring is. Government run intelligence access programs has not been well received by the majority of industry, who have chosen to use other means of achieving compliance.

The current COAG Road Reform Plan relies heavily on telematics in its proposed mass, distance and location charging. However, after seeing the papers published on the issue, there are still concerns that proposed prices have not been valued sufficiently or who will pay for the installation, updating and replacement.

Ultimately, companies that choose to use telematics do so because it suits their purposes and they can financially support it. This is what free market economies do and government intervention using technology is frowned upon by the ATA.

***We recommend the role of technology should be encouraged, but not required for the heavy vehicle industry to operate.***

* 1. Congestion

Congestion is one of the biggest externalities that affect the industry. Urban congestion causes delays for deliveries, as well as forcing heavy vehicles to use other less direct routes in order to avoid the congestion. The time wasted due to congestion is a loss of productivity to the fleet. The paper states Woolworths try to make deliveries outside of peak times as much as possible, this is a restraint on the industry.

The costs estimated in the paper for congestion makes for worrying reading and with the demand for goods and urbanisation of the population happening it is vital road providers take heavy vehicles into consideration as they provide the majority of deliveries to these areas.

Australia has a relatively small population which is widely spread and needs to access hubs of commerce to work. The topic of congestion charging has become very popular recently following the examples in London and Singapore. However, a congestion charge implemented in Australia would simply be a blatant tax as the public transport system is far from adequate to provide a realistic alternative to cars.

Evidence provided by the Competition and Regulation Working Group for COAG shows, it is obvious that some cities have better usage of public transport than others.

Proportion of trips by public transport for Australian Capital Cites 2001

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Sydney  | Melbourne | Brisbane | Perth  | Adelaide  | Canberra | Hobart | Darwin  |
| CBD  | 72% | 60.5% | 56.6% | 47.4% | 30.2% | 12.5% | 14.1% | 6.1% |

Source: page 10, table 2 Review of Urban Congestion – Trends, Impacts and solutions. Report prepared for COAG by the Competition and Regulation Working Group 2006.

Therefore, there is room for improvement with public transport. In many cities people already pay a higher cost for having to drive to cities through parking, which in some cities can be $50 a day. A congestion charge was agreed to in London because there was a real choice of using the public transport system, Australian cities are not London and using this example of London is not a fair comparison.

The Competition and Regulation Working Group have provided a great deal of evidence which suggests solving congestion is going to be one of the hardest tasks road agencies have and there is no single way to cure it. There is a combination of short, medium and long term supply and demand side interventions that will have to happen if the NTC is to have a successful congestion plan. For the population solving congestion, or at least trying to improve the situation should be one of the NTC’s biggest projects and we advise the NTC to view the work of the Competition and Regulation Working Group carefully.

While COAG and the NTC want reform road pricing implemented, we are yet to see concrete commitments to supply side reform, such as acting on the advice of infrastructure Australia and other concerned departments. At this current stage of public transport provision, a congestion charge is simply an extra tax on workers and is not supported by the ATA.

***The ATA recommends that no congestion charging should be introduced in Australia.***

The NTC should seek to improve public transports efficiency, frequency and cost-efficiency for residents in cities in order to alleviate congestion.

# Concerns over NTC focus: goal displacement

The ATA has concerns that the NTC is aiming to cover too much in this discussion paper. While many of the above areas of focus are legitimate, work which is focused on topics du jour such as obesity and social exclusion pulls attention away from the serious topics the NTC should be addressing. The transport system is not directly responsible for these secondary issues and cannot solve them. Indeed it could be argued that some these issues, specifically physical inactivity, are not issues that need concern governments at all.

*Climate change and air pollution*

The Australian Government’s approach to climate change is set out in its Clean Energy Future Plan, which includes imposing an effective carbon price on heavy road transport from the 1st July 2014. The regulatory constraints on heavy vehicle operators mean it will be difficult for the industry to reduce its fuel consumption and increase its productivity to deal with the effective carbon price; it will also be difficult for heavy vehicle businesses to pass the carbon price on to customers.

Rather than speculating about the need for transformational changes to the transport system and conducting surveys, the NTC should focus in this are on achieving tangible, incremental reforms to regulation that will help heavy vehicle operators increase their fuel efficiency by increasing their productivity.

*Social exclusion*

Public transport providers should supply sufficient public transport to support communities not act as social services.

*Physical inactivity and obesity*

Making travel more inconvenient just in order to improve the possibility people will be active is absurd and should not be a future principle of transport policy.

The theoretical considerations the NTC discusses in chapter 3 are not relevant to providing an efficient transport system. The issues discussed are not helpful for planners as giving them a range of social factors to consider along with improving best practice, will cause further strain on the goals of what infrastructure is to provide. The following are things the NTC suggested that people want from transport:

* A strong and smart economy – support productivity through infrastructure. This is a far simpler goal.
* Liveability – Provide efficient public transport and well maintained roads to communities.
* Green and sustainable – Can be achieved through detailed focus on the specifics of regulation.
* Safe and healthy – This is a police issue to provide support on public transport. Emission control is also a government focus not the NTC’s.
* Fair – This is a social concern, not anything to do with the NTC.

These are basic things people want from life. Trying to set a transport plan to reflect all of these is just impossible and would distract time, resources and money from the primary areas where a transport plan can make a great deal of difference.

The project team should just focus on the challenges of:

1. Improving safety
2. Improving Congestion and the unreliability of transport networks, especially at peak periods or when adequate maintenance is not provided. Without introducing congestion charging.
3. Financing the construction of the right transport infrastructures at the lowest cost.
4. Increasing the productivity and efficiency of the freight and passenger transport system which will deliver environmental and economic benefits.

Solve these national problems; other problems are the responsibility of the other areas of government or individuals in their private capacity. The situation is in dire need of reform, the paper is not strong enough on reforming the current system, and too much of the paper focuses on abstract considerations.

Bureaucratic drift is evident in the discussion paper and while the above 4 points are not as politically racy as obesity or climate change, they are what the NTC should focus its resources on. Short term political goals will not provide better infrastructure or public transport. Better decision making has to be a priority and focussing on improving the quality of education that decision makers have is key to making a successful future transport network. The work of both Infrastructure Australia and the Competition and Regulation Working Group show that a strong line of reform on supply side initiatives is necessary for any success to happen in the transport sector.

The NTC should focus its attention on providing roads and transport networks to promote productivity and keep Australia moving. Other peripheral concerns are not issues for the NTC and in some cases not issues for government at all.

APPENDIX A: The ATA and Barkwood Consulting Pty Ltd Truck Impact Chart

The ATA and Barkwood Consulting Pty Ltd have developed a Truck Impact Chart that clearly demonstrates a number of different heavy vehicle combinations and covers GCM, payload, the equivalent standard axles (ESAs) for each vehicle combination, being the measure by which impact of a truck on the road is measured, the amount of trips required to move 1,000 tonnes of freight, the amount of fuel required to move 1,000 tonnes of freight, emissions and driver requirement. The information provided in the tables throughout this document is taken from the Truck Impact Chart.

The Truck Impact Chart has been reviewed RTA’s Senior Pavement Engineer, Ravindra Prathapa. The Truck Impact Chart has also been separately peer reviewed by Bob Pearson, Pearson Transport Resources, and was referred to by The CIE in the Benefit/Cost Analysis for the National Heavy Vehicle Regulator draft Regulatory Impact Statement, released in February 2011.

Authors:

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This document has been prepared to assist operators and road asset managers in assessing the merits of utilising larger vehicle combinations in a transport task.

The assessment process assumes that the vehicle is dedicated to a specific task, operating travel being 50% unladen and 50% laden. The task relativities are 1000 tonnes with a lead of 1000 kilometres

|  |  |
| --- | --- |
| Equivalent Standard Axles: | ESA’s are calculated by the average of the sum of ESA’s for zero load (empty) plus ESA’s for 100% load and multiplied by the number of trips as required for the transport task. |
| Vehicle tare weights: | Are predictions based on the averages for a range of equipment within each combination category. These estimates have been reviewed by a number of operators and confirmed as being representative of “real” vehicles of the category. |
| Fuel consumption estimates: | Are predictions based on accumulated averages where operation is nominally 50% unladen and 50% laden. Actual consumption will vary with operating conditions. |
| Emissions: | Reference is based on total fuel consumption only. |
| 20 metre 7 axle Truck & Dog: | The maximum allowable mass limits for this combination at either CML or HML (for standard combination) is 55.5 tonnes. |
| 19 metre 7 Axle B-double: | The maximum allowable mass limits for this combination at either CML or HML (for standard combination) is 55.5 tonnes. |
| B-triple: | Consists of a complying B-double with an additional complying leading trailer. |
| Converter Dolly: | All combinations utilizing a converter dolly are configured with a tandem axle. The configured vertical imposed loading of a 6x4 prime mover is similar to the allowable imposed vertical loading of a tandem axle converter dolly. |
| AB-triple: | Consists of a complying B-double with an additional complying road train leading trailer and a complying converter dolly. |
| BAB-Quad:  | Consists of a complying B-double with an additional complying converter dolly and additional complying set of B-double trailers. |



1. Page 12 [Issues Paper - Review of Access Pricing on the NSW Grain Line Network - May 2011](http://www.ipart.nsw.gov.au/files/Issues%20Paper%20-%20Review%20of%20access%20pricing%20on%20the%20NSW%20grain%20line%20network%20-%20May%202011%20-%20Website%20version.PDF) – IPART [↑](#footnote-ref-1)
2. Page i – summary – Austroads Technical report – Audit of rest areas against national guidelines - 2008 [↑](#footnote-ref-2)
3. <http://www.nti.com.au/AboutNTI/NewsandMedia/tabid/85/newsid468/17/mid/468/Default.aspx> [↑](#footnote-ref-3)
4. Page 2 Infrastructure Australia – A report to the council of Australian government 2011 [↑](#footnote-ref-4)
5. Page 20 Infrastructure Australia – A report to the Council of Australian Government 2011 [↑](#footnote-ref-5)
6. <http://www.ntc.gov.au/filemedia/Groups/PBSmapsportalFAQ.pdf> [↑](#footnote-ref-6)