Submission No 18

INQUIRY INTO ROAD TOLLING REGIMES

Organisation: National Road Transport Association

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NATROAD

NATIONAL ROAD TRANSPORT ASSOCIATION

Submission to the Transport and Customer Service Committee, NSW Legislative Council

Inquiry into Road Tolling Regimes

23 May 2021

Executive summary

- The road transport industry is extremely competitive with a large number of small operators with poor profitability. The average net profit (after tax) margin has fallen to about 3%, increasing pressure on many owners when it comes to modernising their equipment.

- Tolls are one element of costs over which road transport operators have no control, and their burden has been increasing over the last three to five years.

- There is a lack of transparency and fairness in tolling for heavy vehicles.

- This is producing under-utilisation of tollways such as the M4 and M5, resulting in increasing congestion, worsening community impacts from heavy vehicles on local streets and increasing emissions.

- The NSW Government response has been the forced use by regulation of the NorthConnex tunnel.

- Truck operators already pay more for road maintenance through registration and fuel charges than car drivers.

- Heavy vehicle operators are paying for road network improvements through regular increases in tolls without any evidence to show that promised efficiencies have been delivered.

- The increasing burden of costs, combined with tough market conditions, leave many operators unable to pass these costs on to large customers who hold them to unfair contractual conditions.

- A lack of forward planning about tolls, the unfair imposition of mandatory toll routes and the opaque nature of the setting of toll rates and subsequent increases is being compounded by a lack of competition in private toll operators.

- NatRoad wants the NSW Government to:
  - Introduce a variable toll rate that incentivises off-peak journeys, or give discounts for multiple journeys

  - Create an independent regulator to oversee and manage a fair and transparent toll pricing regimen.

Introduction

1. This submission responds to the terms of reference[1] relating to the Committee's decision to inquire into and report on matters concerning tolling regimes for roads in New South Wales (NSW).

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.

Cost Burden and Evidence

3. The vast majority of NatRoad members operate heavy vehicles. A majority of members operate in NSW. Tolls are one element of costs over which members do not have control and which have been an increasing cost burden over the last three to five years in particular. This cost burden has been exacerbated by mandating tolls for heavy vehicles: the NSW Government's policy of requiring most heavy vehicles to take the NorthConnex tunnel route[2], making paying tolls mandatory, is pointed to as creating an unavoidable cost burden. NatRoad receives many complaints from members about the costs of tolls generally and about NorthConnex in particular,[3] where the current one-way toll for a heavy vehicle is $24.59 (from 1 April 2021).

4. Complaints are centred on NorthConnex because where other NSW tolled roads are in contention, the costs of tolls are assessed by members and, as a result, frequently members report that they use other routes to avoid paying tolls. A commercial decision is made based on the consideration that toll costs are not justified. These decisions take into account the cost offset of time savings and a potential reduction in vehicle operating costs and often weigh against the tolled route.

5. Attachment A is a spreadsheet developed by a member from their internal records, showing the increase in toll charges from 2017-2020 in respect of Sydney and Brisbane. The increases shown are a cost to industry that is increasing but which do not appear to alleviate many of the problems of the Sydney road network, especially congestion. The operator wishes to remain anonymous but reports:

> *We operate a fleet of rigids and prime movers plus a few cars/utes in Sydney and Brisbane. Fleet numbers are stable, but trips can vary with changing freight volumes. Sydney fleet is*

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[1] https://www.parliament.nsw.gov.au/lcdocs/inquiries/2792/Terms%20of%20Reference%20-%20Road%20Tolling%20Regimes.pdf

[2] Trucks and buses (over 12.5m long or over 2.8m clearance height) travelling between the M1 and M2 must use the tunnels unless they have a genuine pick up or delivery destination only accessible via Pennant Hills Road. See https://roads-waterways.transport.nsw.gov.au/business-industry/heavy-vehicles/safety-compliance/pennant-hills-road-regulation/index.html

[3] NatRoad has been consistent in reflecting member concerns about NorthConnex via publicity, recent examples of which are:
21/03/20 https://www.natroad.com.au/covid-19-in-australia-keep-the-trucking-industry-delivering-essential-supplies-by-halting-toll-costs-or-suspending-the-fuel-based-road-user-charges/news/
01/09/20 https://www.natroad.com.au/paying-a-heavy-toll-for-northconnex/news/
22/10/20 https://www.natroad.com.au/northconnex-opens-31-october-2020-questions-remain-unanswered-2/news/
19/11//20 https://www.natroad.com.au/transport-for-nsw-responds-to-northconnex-tunnel-concerns/news/

stable as are freight volumes. Brisbane is growing as a logistics centre due to port, congestion and toll issues in Sydney.

6. In NSW, tolls are set based on commercial considerations reached between a provider, Transurban[4], and government rather than on any palpable network efficiency criteria, a matter reflected in practice where members avoid toll roads wherever possible and where tolls, as reflected in Attachment A continue as a non-controllable cost burden.

7. Toll charges and the rates of toll increases are set under a concession deed negotiated between the NSW government and Transurban at the initial contract stage of a project. Each toll road is subject to separate commercial arrangements and has its own concession deed, the terms of which (including pricing) are determined on the basis of the particular features of that project, and independently of any other toll road.

8. Governments use three key financial levers – concession length, initial toll prices and the toll price escalation schedule. Beyond these private funding sources, governments would have to consider reducing the cost of the project through agreeing a reduced scope or an increased government financial contribution. But the community is not able to assess how these competing forces resulted in the particular outcome given the lack of disclosure, particularly in advance, of the key issues affecting these decisions.

Investigation of Current Tolling Policies

9. There are many aspects of government policies on road tolls in Australia and in NSW that are, in NatRoad's view, deficient. The main problem is the increasing burden of costs combined with the market conditions which, in many cases, do not permit the passing of these costs to customers. Plus, every year toll costs rise at or above inflation levels, depending on the terms of the particular concession agreement. In essence, toll charges for heavy vehicles continue to increase, affecting the slim margins of transport operators and adding to cost pressures during the current pandemic.

10. It is clear from the prior paragraph that in this submission two of the Committee's terms of reference have centrality:

    (c) The impact, and the geographical distribution of the impact, of toll costs on NSW drivers and on productivity;

    (g) The ability or otherwise of trucking businesses to afford increases in tolling charges and the extent or otherwise of their ability to pass this through.

11. This submission concentrates in particular on term of reference (g). Many of the other terms of reference are essential to the better understanding of the way that tolls operate in NSW and the rationale for the charges and increases in those charges. The input of the NSW Government to those issues is therefore highly important and the evidence given to the Committee when published will be essential in better planning

[4] In our understanding, the only non-Transurban toll roads are the Sydney Harbour Bridge and the Sydney Harbour tunnel.

around this vexed subject.

12. The balance of this submission commences with an outline of two prior formal government considerations of tolling issues[5], inclusive of consideration of the NatRoad policy on tolling and then a response to term of reference (g). We conclude with the proposition that what is urgently needed is the establishment of a regulator who has control over the way tolled roads are planned, built and operated. This is because the discussion of tolls are integrally tied to the debate about road user charges more generally. If a new national regulator is not established, for example as part of Heavy Vehicle Road Reform (HVRR)[6], these regulatory functions could be fulfilled in NSW by a body such as the Independent Pricing and Regulatory Tribunal (IPART).

Prior Government Consideration of Tolling Policy

13. Analysis of the two Government inquiries provides insight into the policy deficiencies referred to above and illustrates that most of the problems in this subject area have already been considered. NatRoad policy in the context of analysis of these inquiries is highlighted as the reports are analysed.

14. The first significant Government inquiry into tolling was undertaken by the Senate Economics References Committee (SERC).[7]

15. NatRoad emphasises one of the findings of the SERC's report:

    *The logic of using tolls to fund road construction is reasonable. The use of the price mechanism can theoretically drive optimal provision and consumption of goods or services. However**, this basic economic theory applies to markets where there is no constraint on supply, and where there are alternative products to meet demand**. Once either of those two conditions is unmet, the conditions for an optimal price change.*

    Sometimes there are constraints on supply, including limited or no alternative routes. In particular, heavy vehicles are often prevented from using suburban streets. Or charging a toll may direct traffic on to suburban streets which are less efficient carriers of the traffic. Once a road has been built, especially a major multi-lane motorway, it is efficient to encourage people to use it. One theoretical paper concludes:
    …economically optimal pricing in its purest form leads to major under recovery of capital and maintenance costs for most of the road system.[8]

16. These comments are especially important in the context of NorthConnex where no alternative route is permitted for a large number of heavy vehicles and passage through the tunnel is, because of the lack of an alternative route, akin to a tax on the

[5] NatRoad notes that the Transport and Public Works Committee of the Queensland Parliament completed a report on road tolling in that State in 2018 https://www.parliament.qld.gov.au/Documents/TableOffice/TabledPapers/2018/5618T1324.pdf That report is not analysed in this submission.
[6] The basis of HVRR is set out here: https://www.infrastructure.gov.au/roads/heavy/
[7] Senate Economics References Committee *Toll Roads: Issues of building, financing and charging September 2017* *https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Economics/TollRoads/Report*
[8] Id at paras 2.24 and 2.25

movement of freight. Further, the SERC report identified road tolls as akin to a regressive tax.[9] As the SERC report set out in noting the NatRoad submission:

> *If the gains to the user were sufficient, there would be no need to force trucks onto the motorway.*[10]

17. The main issues that arise from the analysis in the SERC report are a lack of forward planning about tolls, the unfair imposition of mandatory toll routes and the opaque nature of the setting of the toll rates and the subsequent increases. Again, the SERC report identified NatRoad's concerns:

    Tolls can be a substantial issue for businesses. The National Road Transport Association complains that the methods of setting tolls are not transparent. Trucks in fact do not have an alternative to paying tolls, as there are regulations to force them to use the tollway rather than side streets. Trucks already pay more for road maintenance through registration and fuel charges.[11]

18. The SERC report, however, contains six "big picture" recommendations[12] mostly as the SERC recognised the limited powers of the Commonwealth in respect of the regulation of the construction of roads and the related funding models. Recommendation 5 is commended to the Committee as worthy of adoption in the current review as it references the problems with contracts that tie up Governments and which are clouded in commercial-in-confidence arrangements:

    That the Commonwealth take account, in any funding decision, of the degree to which an infrastructure project might constrain future government action, either by the building of the project itself or by clauses in the project contract.[13]

19. To our knowledge all recommendations, including recommendation 5, have not been implemented.

20. The second inquiry was undertaken by the Portfolio Committee No.2 – Health and Community Services of the NSW Legislative Council. It published its report in October 2017 (NSW Report).[14] The Committee made ten cogent recommendations. The Chair's forward in the NSW Report captures the concerns held by many NatRoad members and a position that has become worse since his remarks were made:

    Sydney, in what is a relatively short period of time, has morphed from having just a few road tolls to being one of the most tolled cities in the world. And while the speed at which the number of tolled roads has expanded across Sydney in recent years is significant, what is more surprising, some may argue alarming, is the lack of genuine

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[9] Id at para 5.25
[10] Id at para 3.26
[11] Id at para 4.8
[12] Id at v
[13] Ibid
[14] *Road Tolling in NSW* https://www.parliament.nsw.gov.au/lcdocs/inquiries/2428/Road%20Tolling%20in%20New%20South%20Wales%20-%20Final%20Report.pdf

public debate and transparency around this area of important public policy.[15]

21. One of the NSW Report's main recommendations (Recommendation 3) was that the Government disclose more information about road tolling projects including documents like businesses cases, base case financial models, cost benefit analysis and transport forecast modelling. Disclosure of project information and constraints on government are essential requirements for appropriate transparency and accountability.

22. The NSW Report's analysis took into account the then transport planning instruments of the NSW Government. In NatRoad's understanding the current major transport policy planning document is the *Future Transport Strategy 2056.*[16] Tolls are mentioned once in this document, in the context of development of digital technology thus:

    Embedding sensors and intelligent transport system technologies across key assets, such as bridges, cameras, car parks, streets, traffic lights and ***toll payment infrastructure****, and ensuring their ability to ingest third-party data, will generate enormous volumes of new data on road conditions and traffic patterns. This information will be conveyed in real time to serve the customer and help personalise their journey.*[17]

23. Transport for NSW also has information about motorways and tolling[18] and the tolling[19] model on its web site. The former web address contains a sub-menu which discloses the current and proposed motorway network.[20] The disclosure provided falls well short of the recommendations of the NSW Report. We commend the recommendations about disclosure in the NSW Report[21] and we believe that this vital issue of appropriate disclosure should be reinforced by the Committee as part of this inquiry.

24. One of the elements of disclosure set out in Recommendation 9 of the NSW Report touches on a broader debate. Recommendation 9 is as follows: "That the NSW Government identify and publish the evidence supporting its decision to toll heavy vehicles three times that of light vehicles."[22]

25. NatRoad submits that the Transurban heavy vehicle multiplier discussed in the NSW Report[23] clearly exceeds the marginal cost of road wear and repair costs as a result of the impact of an additional trip made by a heavy vehicle. Transurban applies a 'large vehicle multiplier' of two to three times the car toll depending on the road asset, with

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[15] Id at viii
[16] https://future.transport.nsw.gov.au/future-transport-strategy/introduction
[17] Id at p95 NatRoad's emphasis
[18] https://roads-waterways.transport.nsw.gov.au/roads/tolling/index.html
[19] https://caportal.com.au/rms/motorways/tolling
[20] https://caportal.com.au/rms/motorways
[21] Most of the recommendations impinge on the need for greater transparency and disclosure: Recommendations 1,2,3,5,6,7,8 and 9.
[22] Above note 14 p81
[23] Id at p 79 and 80

the higher toll for heavy vehicles reflecting what Transurban indicated during the outworking of the NSW Report, as its findings regarding the greater value derived from the time savings provided by the tolled network.

26. In 2019, the Australian Trucking Association (ATA) of which NatRoad is a member, estimated that for a fully laden 6 axle articulated heavy vehicle, the estimated maximum marginal cost would be $0.16 per kilometre for an urban toll road.[24] Using 2019 toll pricing on the M7,[25] the ATA calculated that the maximum capped truck toll is $24.72 for a continuous 20km or greater trip, three times the maximum car toll of $8.24. Of the extra $16.48 that is collected, just $3.20 represents road damage costs over 20km, under 20 per cent of the increased toll rate. This evidence stands in stark contrast to the multiplier used by Transurban. It is a focus on calculations of this kind that should form part of increased disclosure and modelling before decisions to charge heavy vehicles greater levels of tolls are considered.

27. If the heavy vehicle toll multiplier reflected the actual monetary gains to operators (as measured objectively), then operators would have an incentive to utilise the tolled roads. As set out earlier in this submission, that does not appear to be happening. There would be no need for truck bans on alternative routes, as is in place with NorthConnex, if the tolls better reflected industry benefit.

28. Similarly, calculations about road wear damage appear based on heavy vehicles carrying their maximum allowable weight. For trucks which are not carrying their maximum allowable weight, and other types of heavy vehicles, the actual cost would be lower than the calculations reflected in the NSW Report. The need for transparency around this issue, as encapsulated in Recommendation 9, is reinforced because Transurban have shown that its preferred approach to unsolicited proposals for new toll road concessions is to partly fund them by an increase in the heavy vehicle multiplier elsewhere on the local Transurban network.

29. NatRoad submits that there is presently no reliable information which identifies the damage caused to roads by heavy vehicles compared with cars in the particular context of each tolled road or tunnel. Similarly, there is insufficient information on the costs of associated repairs which links these factors to the toll charges set for heavy vehicles. Further, heavy vehicles already pay additional fuel taxes and three to 11 times more in registration charges than cars depending on the weight of the heavy vehicle. The issue of reform of road pricing is hence part of the consideration in looking at tolled road policy, taken up further below.

30. Members tell NatRoad that vehicle diversions away from tolled roads are increasing congestion, worsening community impacts from heavy vehicles on local streets and

[24] ATA submission to Infrastructure Australia, 15 November 2019 https://www.truck.net.au/sites/default/files/submissions/20191115ATAsubmissionAustInfrastructureAudit.pdf at p5

[25] Westlink M7 is a major connecting road on Sydney's orbital motorway network. It runs for 40 km and links the M5 at Prestons (in the South) with the M4 (Eastern Creek) and the M2 (West Baulkham Hills in the North). Westlink M7 is intended to improve transport options between the Liverpool, Fairfield, Blacktown and Baulkham Hills communities.

increasing emissions (by not taking the most direct route). They suggest that urban road networks are not working as efficiently as they could, with increased congestion levels.

31. In this latter regard in March this year NatRoad alerted the NSW Government to the fact that placement of some toll roads has caused congestion and other pressures on nearby roads.

32. Members indicated to us that this has occurred in respect of the Bexley area following the introduction of a toll on the M5 East.[26] NatRoad informed the NSW Government that this toll road is not made mandatory (given the unfairness associated with that issue for heavy vehicles in the context of NorthConnex, discussed above). We indicated that if the Government is planning to make this tolling area mandatory, we would propose that be the case in respect of light vehicles so that freight deliveries are preferenced, a pressing social issue during the pandemic. For example, during the pandemic, online shopping grew five to six times the level of annual growth in 2019, increasing the last mile freight task (this increased demand on the industry and accelerated a trend that had been developing more slowly).[27]

33. Another example is the M7 at Eastern Creek where congestion brings traffic to a halt north and southbound each workday morning and afternoon. Traffic frequently chooses to take Wallgrove Road as the interchange at the meeting of the M4 and the M7 is very poorly designed and chokes. Chandos Road is then often chosen then Trivet Street with resultant heavy congestion in those roads together with Ferrers Road. The M7 is a well constructed road but the choke point at the intersection with the M4 is productivity sapping because of these effects. NatRoad calls for an examination of all interchanges between tolled and untolled roads.

Passing on Toll Costs

34. The road transport industry is extremely competitive with a large number of small operators who obtain slim margins and poor profitability. A 2020 survey of the industry found:

Average net profit (after tax) margins have fallen to around three per cent of revenue, increasing the pressure many fleets face when it comes to modernising their transport equipment.[28]

35. Increasingly, members tell NatRoad that customer contracts offer the operator limited ability to negotiate: “take it or leave it” contracts proliferate.

36. Evidence given to the Australian Senate in the lead up to the publication of the SERC report showed that smaller trucking operators are less able to use their fleets (or single vehicle) to convert travel time savings to direct benefits for their companies (a matter alluded to in the

[26] https://www.linkt.com.au/sydney/using-toll-roads/about-sydney-toll-roads/m5-east/toll-pricing
[27] See *Infrastructure beyond COVID-19*: https://www.infrastructureaustralia.gov.au/publications/Infrastructure-beyond-COVID esp. at p86
[28] https://www.isuzu.com.au/media/1253002/isuzu-future-of-trucking-report-the-road-ahead.pdf at p 17

discussion above in paragraph 4). Smaller operators are also very sensitive to costs and road pricing.

37. Recognising the vulnerability of smaller operators, increasingly, NatRoad members indicate that larger transport operators have reduced contract bargaining power. This is because larger operators are often dependent on their existing work. For example, a large operator may generate a large proportion of its revenue from one customer. The result of losing that work would be financially ruinous because of the capital investment in vehicles and the cost of staff redundancies if the operator were to lose that work, a matter that is highly possible where even though a contract has a pro forma 5 year term the customer may terminate the contract on as little as 30 days' notice.

38. A complicating factor is that most transport contracts do not guarantee the operator exclusivity or a particular volume of work: the customer is free to use other carriers. Thus, where there is no guaranteed price rise, but an operator is theoretically able to 'negotiate' to recover costs, the customer can simply choose to use an alternative carrier for the work. The operator is therefore reluctant to insist on passing on cost increases, inclusive of toll costs, in circumstances where this might result in loss of work.

39. An additional complicating factor is where work is offered via digital freight platforms. One member consulted on this subject said that "When we price our own work we factor the toll charges in but when we operate in the gig economy area we are price takers not price setters, so building toll costs in becomes problematic." Whilst these platforms are often painted as mechanisms to reduce costs, differentiate product offerings and redefine business models in a positive sense, NatRoad member experience is that many contracts concluded through this medium are unsatisfactory. When NatRoad surveyed members about the use of these platforms in 2019 a typical response was that "there are no checks and balances in place to ask if we have the capacity to complete the job, the right insurance or safety measures in place. They really do not meet the chain of responsibility requirements at all."[29]

Tolled Roads and HVRR

40. The federal government is, as indicated in paragraph 12 of this submission, embarking on the HVRR process. NatRoad, with some qualifiers, supports HVRR. This reform must also occur contemporaneously with a review of infrastructure funding with the aim of de-politicising decisions about road construction. The goal should be to have all road users contribute their fair share to the construction and maintenance of roads.

41. The HVRR reforms present an opportunity to address the weak links between what heavy vehicle users pay and the services they receive. Additionally, through hypothecation, the reforms have the capacity to improve budget predictability for road building and maintenance, thereby improving service outcomes for heavy vehicle road users. It has become evident from recent Government discussions that in parallel with the HVRR supply side reforms should include light vehicles. This is because light vehicles use the same road networks and, in essence, are currently subject to similar

[29] NatRoad 2019 survey, one of the qualitative responses received.

charging for road use through fuel taxes. Road user charging developed in isolation from light vehicles makes no sense, as is the case with the setting of tolls.

42. To be effective and free of political interference, the process of better regulation of road pricing for heavy vehicles must be guided by an independent regulator. The extent to which heavy vehicle road infrastructure may be converted into a utility like electricity or water supply must be explored having regard to the full range of costs imposed on the heavy vehicle industry, overseen by an independent price regulator.

43. The independent regulator must primarily oversee an independent pricing system which would need to have at least the following two characteristics:

    - Governments would agree on the pricing rules to be used and the overall approach for the regulator to follow.
    - Once the rules were established, the regulator would make and apply its pricing decisions. Its decisions would not be subject to ministerial approval or parliamentary disallowance.

44. The independent price regulator must, vitally, set service levels for the road network. Pricing without appropriate service levels is meaningless. Service levels should be designed to facilitate high productivity vehicle access, future vehicle automation and facilities for heavy vehicles such as rest stops which are currently manifestly inadequate for facilitating the road transport task, especially in NSW and particularly in the greater Sydney region.[30] Road expenditure should be sufficient to maintain pre-determined service levels and should be part of detailed asset management plans that cater for heavy vehicle freight movements.

45. The independent price regulator should also regulate and monitor toll fees and landside port charges, given the current lack of transparency and fairness in setting tolls and landside port charges for heavy vehicles and a national lack of uniformity and policy principles associated with the application of toll charges and landside port fees where these charges are currently levied. In the interim, we submit that the Committee should recommend to the NSW government that regulatory functions over tolls and toll setting could be fulfilled in NSW by a body such as the Independent Pricing and Regulatory Tribunal (IPART). That agency should be given a brief to analyse all current government contracts with toll providers and to make an assessment of the efficacy and fairness of current toll pricing as well as reporting on the short, medium and long-term burden on taxpayers created by the extant toll concession contracts.

Conclusion

46. NatRoad members report that in NSW there appears to be underutilised toll road capacities (as members where possible choose not to use toll roads.) At the same time members report deteriorating traffic network performance with growing demand and resulting traffic congestion and time delays. This is due in part to increased private light vehicle traffic flows as people choose to commute via private vehicles induced by

[30] See https://www.fullyloaded.com.au/industry-news/1905/ata-in-rest-area-urgency-election-plea by way of example

fear of catching COVID-19.[31]

47. The Committee's inquiry is therefore applauded. NatRoad believes that there is already sufficient material in play so that policies to address the treatment of toll roads as commercial assets rather than infrastructure designed to enhance road network efficiency can be implemented, particularly an independent price regulator. Tolls are determined by commercial/funding factors, and not on the basis of fairness or network efficiency criteria.

48. Members' negative sentiment towards tolling in NSW is driven by the lack of justification of the toll multiplier and the impact on the cost of business and this resentment builds as congestion increases on non-tolled routes. Heavy vehicle tolls are not a simple application of user pays – members are overpaying and are increasingly forced to use the asset as a result of government regulation, inclusive of not providing access to alternative routes or putting in place mandatory requirements as is the case with NorthConnex.

49. We believe that the following issues must be addressed urgently:

- the lack of transparency and fairness in setting toll fees for heavy vehicles, inclusive of using a multiplier without reference to clear objective criteria;
- the lack of competition in private toll road operation;
- why there is no consideration of a variable toll rate for off-peak journeys or discounts for multiple journeys;
- heavy vehicle operators paying for road network improvements through increases in tolls without evidence showing that the promised efficiencies have been delivered, and
- governments forcing heavy vehicles to use tolled roads by banning them from alternative routes, as with the NorthConnex issue.

[31] Substantiated by media reports such as https://www.smh.com.au/national/road-traffic-returns-to-pre-covid-levels-as-commuters-shun-public-transport-20210129-p56xw7.html

Attachment A

Total Annual Tolls: Sydney

Year\Month	January	February	March	April	May	June	July	August	September	October	November	December	Total	Annual Growth
2017	4636.01	5883.66	6330.12	5900.82	8458	8364.69	7499.31	10077.725	9304.67	24062.4	8756.52	7437.06	106710.985	
2018	6569.2	8098.16	8960.61	7856.4	10958.55	9202.09	7579.26	9748.34	8996.23	9425.29	8165.37	6905.63	102465.13	-4.0%
2019	6420.75	6787.62	7887.55	6374.24	9195.93	7510.855	9442.9	9490.19	11412.29	10224.49	10552.59	8643.75	103943.155	1.4%
2020	8343.21	9721.59	9952.355	11262.85	13201.02	10995.97	11426.59	11589.19	11610.13	11643.95	12121.015	10054.075	131921.945	26.9%
2021	8885.125	10463.745	11094.56										30443.43	

Total Annual Tolls: Brisbane

Year\Month	January	February	March	April	May	June	July	August	September	October	November	December	Total	Annual Growth
2017	3000	4000	6341.27	5000	5061.5	5051.83	5078.29	6532.375	6574.98	6730.23	6692.7	6664.75	66727.925	
2018	6046.51	5500	5613.75	5511.22	6000	6000	7579.26	6003.65	6000	6098.78	6291.13	5709.66	72353.96	8.4%
2019	6000	6048.8	6020.75	6000	6000	6012.425	6000	7507.2	7500	9000	9013.34	9000	84102.515	16.2%
2020	7505.16	9721.59	9952.355	7500	10028.3	10995.97	12000	14854.76	13884.66	12915.33	13085.765	9731.605	132175.495	57.2%
2021	10078.625	11349.355	11969.92										33397.9	