

# ROE'S HOLDINGS PTY LTD

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**GENERAL TRANSPORT - LOCAL & INTERSTATE**

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## ROE'S TRANSPORT

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National Transport Commission  
Level 3  
600 Bourke Street  
Melbourne  
Vic, 3000

### **Heavy Vehicle (Mass, Dimension and Loading) National Regulation Amendment Consultation.**

Thank you for the opportunity to submit to the draft amendments to the MDL National Regulation.

By way of introduction, I am currently 71 years of age and still actively engaged and involved in our small family road transport business ,conducted by myself, my wife Jenny and our son Daniel. We operate 2 trucks, mainly engaged in open trailer work between the East Coast capitals and regions of Australia. In the 50 years plus that I have been involved in this industry I have constantly strived for meaningful reform, through such contentious issues as the Razorback Blockades of the late 1970's and the RSRT in 2016. Our company has been a member of industry associations such as Natroad and the National Road Freighters Association for many years and I currently serve as secretary for the National Road Freighters Association. We were early participants in the industry Trucksafe program, holding membership number 000158 and later transitioned to the NHVR accreditation scheme for Mass and Fatigue Management. I do wish to point out that this submission is not to be interpreted as being indicative of National Road Freighters Association policy but rather reflects the opinions of our family operated business.

The first regulation we would like to address is the proposed regulation to eliminate one level of accreditation by advancing the general mass limit to the same as the Concessional Mass Limit without the requirement for any type of accreditation. We have grave fears that this regulation will have the obviously unintended consequence of interfering with the freight market by allowing an increase in revenue to those operating outside the accreditation standards without the associated costs of being accredited.

In an operation such as our own we would have to reconsider our commitment to accreditation if we were being forced to compete commercially with entities with none of the financial commitments to any accreditation scheme. For us to move into a Higher Mass regime would require even more financial commitment with no guarantee at all of financial benefit. We fear that the unintended consequence of this change would be a considerable reduction in the number of small to medium operators continuing with their accreditations. A further, more grave unintended consequence of this regulation would be the risk to safety standards, if because of this regulation operators chose to operate without any form of accreditation.

I believe that statistics have always shown that accredited operators are safer operators.

The second regulation we wish to make commentary on is the increase in maximum single trailer combination length from 19 metres to 20 metres. At the National Road Freighters Association conference held in Brisbane in February 2025 when an attendee from the NTC indicated that this change to NHVL was under consideration, he indicated that it would be left to individual operators to decide whether the extra

metre could be taken in the prime mover, by means of improved safety outcomes (by providing more room for drivers to allow them to better manage their fatigue) or the operators could opt to have longer trailer lengths (for more capacity and efficiency). There was a very strong reaction from the small fleet owners, owner/drivers, and drivers in attendance that any change in this part of the HVNL should be restricted to the prime mover only because the comfort and safety of the driver is paramount.

Again, we fear that the unintended consequence of the regulation being administered in this form would be a distortion of the freight market. Any operator taking advantage of the extra metre to operate longer trailing equipment would have an immediate commercial advantage over those who would choose to provide a safer working environment for their drivers.

This commercial advantage would soon eliminate the prospect of any new trailing equipment being ordered without the extra length being applied to the trailer particularly with the requirement for compliance with ADR 38/05, negating the possibility of any existing equipment being utilised for the regulation change without the considerable cost of upgrading the equipment.

Again, we thank you for the opportunity to submit and ask that you keep us informed of any and all decisions that are made.

We are also available should you require any further information.

Roe's Holdings Pty Ltd

Chris Roe

