

Sunday 11<sup>th</sup> January 2026

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

To the National Transport Commission,

**RE: HEAVY VEHICLE - Mass, Dimension & Loading - National Amendment Regulation Consultation.**

My name is Corina Oldenmenger. I am a 38-year-old female professional truck driver with over 20 years of industry experience including local, intrastate and interstate roles. I am a second-generation driver, having grown up in, and around the transport industry. Over my career, I have worked for major transport companies, previously owned and operated my own truck, and for the past 13 years have been continuously employed by a small-to-medium transport operator. I am also a member of the National Road Freighters Association and actively engage in industry consultation and professional development.

I am writing to formally object to the proposed amendments to the Heavy Vehicle (Mass, Dimension and Loading) National Regulation relating to the increase in prescriptive vehicle length to 20 metres and the proposed changes to General Mass Limits (GML). My objections are based on safety, driver wellbeing, fairness across the industry, and long-term compliance outcomes.

**Vehicle Length – 20 Metre Combinations**

I strongly oppose any amendment that allows the additional metre of vehicle length to be allocated at the discretion of operators, particularly where that additional length may be applied to trailers rather than prime movers.

From a driver safety and wellbeing perspective, increasing trailer length offers no tangible benefit to the people operating these vehicles. Conversely, allocating the additional metre to the prime mover would allow for improved cabin and sleeper berth space. Current sleeper berths are, in many cases, smaller than a standard prison cell, despite drivers being expected to live in them for days, weeks, or even months at a time while away from home, family, and support networks.

Cabin space is not a luxury, it directly affects fatigue management, mental health, personal safety, and overall driver wellbeing. A modest increase in prime mover length would allow for safer and more practical sleeper configurations, storage for essential personal equipment, and the ability to install basic amenities such as microwaves and fridges without creating unsafe or cramped conditions.

Allowing companies to instead allocate the extra metre to trailers, provided certain technical requirements are met, creates serious and inequitable consequences for the industry. Larger operators with greater financial capacity will be able to purchase or modify equipment to take advantage of the increased trailer length, while smaller operators and family-run businesses will be unable to compete. This will significantly narrow the market, disadvantage compliant small operators, and increase pressure on some to operate non-compliantly in order to survive.

This approach sends a clear and concerning message that freight efficiency is being prioritised over driver safety and comfort. The additional length should not be a commercial optimisation tool — it should be a safety and wellbeing measure.

At the National Road Freighters Association annual conference held in Brisbane, February 2025, which I attended as a member, an NTC representative presented these proposed reforms to an audience of more than 100 industry participants. The room included company owners, owner-drivers, and company drivers across a wide range of sectors including tippers, tankers, long-distance, local, general freight, specialised freight, and oversized transport to name a few. When asked where the additional metre should be applied, not a single hand was raised in support of increasing trailer length. The consensus was unanimous: the additional metre should be allocated to the prime mover, not left to company discretion.

I strongly urge the NTC to mandate that any increase to the 19-metre limit be applied exclusively to the prime mover, ensuring that the reform delivers genuine safety and wellbeing benefits rather than exacerbating inequity and risk.

### **Mass Limit Changes**

I also oppose the proposed mass limit changes that would increase GML to match current CML limits while removing the requirement for mass management accreditation.

As a driver, keeping up with regulatory changes is already increasingly complex. The current system of GML, CML, and HML provides clarity, structure, and accountability. Importantly, operators carrying higher masses under CML or HML are required to pay for accreditation and demonstrate compliance through record keeping, auditing, maintenance evidence, and ongoing reporting.

Removing CML and allowing increased mass limits without mandatory accreditation significantly lowers the minimum standard of compliance across the industry. It creates a situation where operators can legally carry additional weight at no cost, without meeting the safeguards outlined in the Mass Management Guide. This undermines the operators who have invested time and money into doing the right thing and rewards those who have not.

Such changes will increase the risk of non-compliance, reduce enforcement effectiveness, and place additional pressure on drivers, who are often the ones held responsible at the roadside. It will also distort the freight market by allowing unaccredited operators to increase revenue without meeting the same safety, maintenance, and compliance obligations as accredited operators.

A simpler and safer approach would be to retain the existing GML, CML, and HML framework. This system is well understood, encourages best practice, and ensures that increased mass limits are matched with appropriate accountability.

### **Conclusion**

The proposed amendments, as currently framed, risk reducing safety outcomes, disadvantaging smaller operators, increasing non-compliance, and further eroding driver wellbeing. I urge the National Transport Commission to reconsider these changes and to prioritise reforms that genuinely improve safety, fairness, and sustainability across the transport industry.

Truck drivers keep Australia moving every single day. Any regulatory reform should reflect that reality by placing safety, health, and equity at its core.

Thank you for the opportunity to provide this submission.

Yours sincerely,

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Corina Oldenmenger