

ROE'S HOLDINGS PTY LTD

ABN 82 066 717 468

GENERAL TRANSPORT - LOCAL & INTERSTATE

Daniel Roe
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

ROE'S TRANSPORT

PO BOX 545,
YARRAWONGA
VICTORIA, 3730

PH: 0438 333 360

EMAIL: roesholdings@bigpond.com

Sunday 11th January 2026

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 our feedback on the Heavy Vehicle Mass, Dimension, and loading amendment.

I'd like to start by introducing myself and my experience. I grew up in a house where my parents (Chris and Jenny) run a small niche transport business of 3 trucks. After finishing year 12, I immediately started working in the Australian road transport industry, I worked in several different operations roles at 3 major transport companies over 7 years before returning to work in the family transport business as the 3rd generation, where I have worked for the past 13 years.

The first regulation I would like to address is the proposal to remove Concessional Mass Limits (CML) from the NHVAS accreditation and make CML weights standard mass. Having spoken to various operators in our industry, I have grave fears that this change will actively encourage operators to fall out of the NHVAS accreditation scheme. For most companies, especially small to medium transport operators, CML gave them a system of compliance, and for the time and money rewarded them with an extra weight allowance. Alongside other accreditations the enrolment in CML was worthwhile to a business where less than 50% of their freight was loaded to maximum carrying capacity. For these businesses it gave you an advantage over businesses that didn't participate in NHVAS, yet was not as costly as participating in HML, where the requirements in some states were for mass monitoring systems to be installed. Changing CML to standard mass will mean that these operators will be in a position where they won't get the same value out of joining in the HML scheme and will be forced to drop out of the mass component. While at the same time interfering with the freight market by giving companies that have never participated in accreditation, the same privileges as those that used to participate in accreditation schemes. For HML accredited companies there used to be a sense of advantage where there would be a significant difference between the weight an unaccredited company could carry vs the weights a company participating in HML could carry. As it stands, changing CML to standard mass will close the gap substantially in a competitive market, where an unaccredited company will now have a cost advantage, potentially leading to a market where the buyer of the service sees a cost saving by using non accredited operators. At the same time for the operators who have never participated in accreditation they will now be faced with a confusing system where the sum of the maximum axle weights, will be more than the allowable gross mass of their vehicle because the system was a mass allowance, not a mass limitation. To make such a change that may encourage operators to leave

accreditation systems seems counter productive to an industry that is continually told that those who are accredited are the safer operators in the industry

The second regulation I would like to address is the single trailer combination increase from 19 meters to 20 meters. To me this change seems to complicate the system and miss the people that actually need the change. While at the same time encouraging operators to choose a commercial advantage over providing a safer environment for their drivers and intern everyone on the road. At this point in time there is an exemption for road train prime movers that exceed 19 meters. Unfortunately by changing the regulation there will now be the requirement of ADR 38/05. This requirement is going to exclude operators who operate in remote areas, who don't want complicated braking systems because they cannot be used in a safe and effective manner because of the environment, and intern usually cause costly breakdowns and downtime. These operators still need to load their freight in regional centres and capital cities where they now may face a situation where as an operator who chooses to have a truck equipped for drivers, providing space for necessary items and an appropriate space for drivers to manage their fatigue, that they find their trucks and trailers won't be compliant unless they spend money on equipment that doesn't suit what they do. To me it seems like the only people who will have any advantage from this change will be the larger companies operating longer trailers with new trucks fitted with the appropriate braking technology. Unfortunately for the drivers in the industry, the sleeping area in these trucks is less than a standard size single bed, but the win is for the operator who will now save the current cost of the permits, they currently have to have, to run these vehicles. Again in a competitive market, the buyer of the service will be looking at the savings of long trailers, thus leaving drivers to do their best with what they have instead of having an environment that will actively allow them to be safer on the road.

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

Im also available should you require any further information

Roe's Holdings Pty Ltd.

Daniel Roe

