



## HVIA Submission

On the Heavy Vehicle (Mass,  
Dimension and Loading)  
National Regulation  
Amendment

**January 2026**

Heavy Vehicle Industry Australia  
Represents and advances the interests of manufacturers  
and suppliers of heavy vehicles and their components,  
equipment and technology.



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## About HVIA

Heavy Vehicle Industry Australia (HVIA) represents and advances the interests of the entire industry involved in the design, manufacture, importation, distribution, modification, sales, service, and repair of on-road vehicles with a gross vehicle mass or aggregate trailer mass over 3.5 tonnes as well as their components, equipment, and technology.

The industry directly employs over 70,000 people and provides some of the world's most efficient, safe, innovative, and technologically advanced vehicles. HVIA seeks to work with government and industry stakeholders to promote an innovative and prosperous industry that supports a safe and productive heavy vehicle fleet operating for the benefit of all Australians.

## Summary of HVIA's position on the MDL amendment

**HVIA supports the changes but has highlighted several specific points related to the policy settings that will further benefit productivity if addressed.**

**HVIA's preference is for them to be addressed now, but not at the expense of further delays to the MDL amendment.** HVIA will continue to advocate for their rectification in subsequent HVNL reforms and looks forward to those discussions with regulators at all levels.

## General comments

HVIA welcomes the opportunity to comment on the National Transport *Commission's Heavy Vehicle (Mass, Dimension and Loading) National Regulation Amendment consultation overview*. HVIA acknowledges the extensive and on-going consultations that the Commission has undertaken on this topic leading up to the release of the consultation overview in December 2025.

HVIA strongly supports increases to mass and dimension limits as ways of improving productivity. The industry and wider community desperately need these reforms. Without them, the growing freight task will result in greater congestion, negative road safety impacts, and higher emissions.

Specifically, increased mass and dimension limits will provide HVIA's members, and the wider industry in general, with the following direct benefits:

- reduced re-engineering costs for imported trucks
- access to a wider range of trucks from overseas markets
- increased flexibility in designing innovative trailer solutions
- increased flexibility in truck-trailer interoperability within fleets
- reduced administration and costs when operating under permits or other arrangements.

Notwithstanding, the proposed increases each represent only minor incremental changes to mass and dimensions. HVIA considers that the ability of these changes to deliver the productivity increases needed to meet the growing freight task is unclear.

HVIA has previously questioned whether the changes are sufficiently ambitious, and that concern remains. Additionally, HVIA remains concerned that none of the amendments have resulted in a simpler law, and instead, more layers of complication have been added.

Additionally, there are several unfavourable policy settings (see summary table below). The reasons why they are considered unfavourable are explained in the following section.

### Unfavourable policy setting summary table

<b>General Mass Limits (GML) to Concessional Mass Limits (CML)</b> <ul style="list-style-type: none"><li>• retaining the quad axle group load equivalency to the triaxle group load perpetuates a productivity disadvantage</li><li>• retaining the GCM caps constrains productivity</li><li>• eliminating the 1TMTA will limit productivity in situations where load flexibility is required</li></ul>
<b>Length limit from 19 metres to 20 metres</b> <ul style="list-style-type: none"><li>• allowing an increase in the length of the truck (but not the trailer) limits the benefit</li><li>• imposing an internal dimension ratio control restricts operational flexibility</li></ul>
<b>Tow mass ratio for tag trailers</b> <ul style="list-style-type: none"><li>• no towed mass ratio limit is necessary, and the new 1:1.3 ratio may limit some operations</li></ul>

HVIA also remains concerned about possible responses from road managers (at all levels) to these changes but acknowledges that those responses are outside control of the Commission.

Those concerns are pertinent, however, as road managers have previously expressed doubt on the ability of specific infrastructure to cope with even minor increases in mass and dimensions. It is possible that following the MDL changes, road managers will use local signage to restrict access.

To that end, it would be useful to understand the level of road manager support for these changes. Without road manager support, the changes may have the negative impact of complicating access and reducing productivity, rather than improving it.

## Specific comments on the changes

### Increase General Mass Limits (GML) to the limits that currently apply under Concessional Mass Limits (CML)

HVIA supports the move to increase GML to match the limits under the current CML and repeal the current CML arrangement. It will deliver a marginal productivity benefit for mass constrained operations, if it translates into existing general access arrangements, and is not limited nor otherwise restricted at the state or local level.

HVIA understands that no changes are proposed for Higher Mass Limits (HML), which is regrettable. HVIA questions the logic in reforming only some mass regulations, as pursuing further reforms to HML later unnecessarily duplicates the effort required.

With regards to the specific policy settings proposed:

- **Quad axle groups** – HVIA questions why the mass limit for quad axle groups, and groups with five axles or more, remains tied to the triaxle mass limit. That setting imposes a productivity disadvantage for those axle groups, due to the tare weight increase brought by the additional axles. HVIA understands that the disadvantage was not created by these reforms but considers it a significant missed opportunity that it is perpetuated, rather than addressed and resolved.

- **Five percent gross mass limit** – HVIA supports the removal of the 5 percent gross mass limit that previously applied under CML, but notes that the benefit is minor as most combinations will remain constrained by the GCM caps that remain (1 tonne for GCMs below 55 tonnes, 2 tonnes for GCMs above 55 tonnes). Additional productivity gains would be realised by revising those caps or removing them entirely.
- **1TMTA removal** – HVIA questions the logic in removing the ‘1-tonne triaxle mass transfer allowance’ (1TMTA). Its impetus was to grant additional flexibility in loading practices, without sacrificing productivity. Increasing the GML limits do not negate the operational need for that flexibility. If 1TMTA is not extended to reflect the new triaxle mass limits, productivity will continue to suffer slightly in situations where that flexibility is required.
- **Axle spacing mass limits** – HVIA understands the need to ensure that vehicles operating at the new GML mass limits are not required to modify their axle spacings. Nonetheless, HVIA flags the eventual need to revise the bridge formula, and recommends a formal review in the coming months/years, as a means of simplifying that area of the regulations.

### **Increase the length limit for vehicles from 19 metres to 20 metres**

HVIA supports the move to increase the length limit from 19 metres to 20 metres, as again it will deliver a marginal productivity benefit for volume constrained operations and is a sensible match for the productivity gains afforded under the changes to mass. Notwithstanding, its benefit will be similarly defined by any access restrictions applied at the state and local levels.

With regards to the specific policy settings:

- **Length limits for specific combination types** – HVIA questions the logic in limiting the application of the benefit to truck length only, for truck and dog/pig/tag trailer combinations. Those combinations regularly haul volume-constrained freight. Allowing an increase in the length of the truck, but not the trailer, unreasonably limits the benefit. The policy setting should offer complete flexibility as to where the additional metre is utilised.
- **Internal dimension ratio settings** – HVIA understands the reason why the PBS Level 1 limit of 7.4 metres for swept path was chosen, but considering the subsequent restrictions imposed on vehicle internal dimensions, HVIA does not agree with that choice. It appears too restrictive and may be a poor match for the performance of the current general access fleet. HVIA calls for alternatives that may enable the removal of the internal dimension ratio controls, which are overly confusing.

### **Expand Euro VI concessions to road trains**

HVIA supports the expansion of Euro VI axle mass concessions to prime movers used in road train combinations, as the changes rectify unintended oversights in previous regulatory amendments.

HVIA’s position remains that there should be no regulatory barriers that hinder the industry’s adoption of Euro VI equipment, and the transition to safer, cleaner, and more productive vehicles.

To that end, HVIA notes that the concessions proposed do not fully offset the additional tare mass of Euro VI prime movers in road train combinations, and the 0.5 tonne allowance for twin steer vehicles is 0.5 tonnes less than should be applied. Prime movers featuring twin steer axle groups missed the original 0.5 tonne allowance granted decades ago during the introduction of earlier emissions standards requirements and have suffered that unfair 0.5 tonne penalty ever since.

As such, HVIA looks forward to further discussions with regulators regarding expansion of steer axle mass limits for Euro VI equipment.

### **Amend the tow mass ratio and associated conditions for tag trailers**

HVIA supports the removal of the 1:1 limit on the ratio of 'towing vehicle to towed vehicle' mass, which was incorrectly applied to tag trailer combinations following HVNL changes in 2018.

HVIA has since advocated extensively for the limit to be removed entirely, and understands that position was supported on safety grounds, as well as via simulation work completed by the National Heavy Vehicle Regulator.

Hence, HVIA's position remains that no mass ratio limit is needed, as the required level of safety assurance is achieved by other, existing regulatory controls, including axle mass limits, and manufacturer's minimum steer axle loads. In that context, HVIA is disappointed that some stakeholders disagreed with valid technical assessment findings and failed to provide reasonable justification for doing so.

Nonetheless, HVIA recognises and supports the changed limit from 1:1 to 1:1.3, and the associated policy settings, but notes that some operations will still be unreasonably limited by the new 1:1.3 limit. Those operations include truck and tag trailer combinations featuring a truck with a tipping bin, towing a piece of mobile plant such as a tracked excavator.