

16 January 2026

National Transport Commission
Level 3/600 Bourke Street
Melbourne, Victoria, 3000

E: enquiries@ntc.gov.au

Dear National Transport Commission,

HEAVY VEHICLE (MASS, DIMENSION AND LOADING) NATIONAL REGULATION AMENDMENT

ARTC welcomes the intent of these reforms to modernise heavy vehicle regulation, improve consistency across jurisdictions, and recognise cleaner vehicle technologies. These are positive steps toward a simpler, safer, and more sustainable freight network.

However, the proposed changes have broader implications for modal balance, infrastructure costs, and safety at rail interfaces. We support the overall direction but seek assurance that implementation occurs within a balanced national framework that: keeps competition between road and rail fair, protects shared infrastructure, and encourages lower emission freight outcomes.

The draft regulation introduces several improvements:

- **Clauses 10–13** modernise mass limits by increasing General Mass Limits (GML) to current Concessional Mass Limits (CML) and updating axle tables.
- **Clause 16** recognises cleaner technology by extending Euro VI concessions to road trains with appropriate axle caps.
- **Clauses 17–18** deliver a safety uplift for longer combinations through ADR 38/05 braking requirements for trailers in 20 m combinations and side underrun protection for extended S dimensions.

Despite these positives, critical safeguards remain absent to manage impacts on rail infrastructure and maintain modal competitiveness:

- **Safety and Network Interfaces:** There is no requirement for pre-implementation modelling of turning paths and intersection safety near level crossings and terminals, nor any commitment to National Heavy Vehicle Regulator (NHVR) targeted compliance checks or data sharing during rollout.
- **Level Crossing and Infrastructure Impacts:** Longer and heavier trucks will affect crossing timings, signalling, and track circuits, yet there is no mechanism for cost sharing of upgrades that primarily benefit road freight and no assessment of road overbridge wear above rail lines.
- **Competitive Neutrality and Cost Recovery:** The draft lacks linkage to Heavy Vehicle Road Reform or competitive neutrality principles, as well as transparent reporting of infrastructure impacts and equitable maintenance cost allocation.
- **Emissions Alignment:** While Euro VI concessions are positive, there is no emissions reporting requirement or voluntary program to align with Net Zero objectives.
- **Implementation and Oversight:** Removal of CML accreditation reduces oversight without compensatory measures, and there is no staged rollout or formal engagement protocols for infrastructure owners.

RECOMMENDATIONS

To ensure reforms deliver genuine productivity improvements without undermining shared national objectives, ARTC recommends:

1. **Safety Modelling:** Mandate turning path and intersection safety modelling for 20 m combinations near rail interfaces before commencement.
2. **Infrastructure Cost Sharing:** Include a principle that costs for crossing and signalling upgrades attributable to road changes are shared by road authorities/operators.
3. **Bridge Impact Assessments:** Require assessments for overbridges spanning rail lines and transparent reporting of impacts.
4. **NHVR Oversight:** Commit to random audits and telematics-based compliance monitoring for 24 months post-implementation.

5. **Staged Rollout:** Implement reforms in phases with readiness criteria and engagement protocols for infrastructure owners.
6. **Emissions Transparency:** Make access to mass benefits conditional on basic emissions reporting or participation in a voluntary freight emissions program.
7. **Competitive Neutrality:** Explicitly link reforms to Heavy Vehicle Road Reform and require public reporting of infrastructure impacts and cost allocation.

ARTC supports modernising heavy vehicle regulation to enhance safety and productivity, noting that reforms should ideally sit within a balanced national framework that: keeps competition between road and rail fair, protects shared infrastructure, and encourages lower emission freight outcomes.

We welcome continued engagement with the NTC, NHVR, and state agencies as drafting progresses. Please contact Policy and Regulation Advisor, **Melissa Ras** ([REDACTED]) if you would like to discuss further.

Yours sincerely,

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Susan Furze

General Manager, Policy and Regulation
Australian Rail Track Corporation