



HEAVY VEHICLE NATIONAL LAW MASS, DIMENSION AND LOADING AMENDMENTS

AUSTRALIAN TRUCKING ASSOCIATION SUBMISSION 19 JANUARY 2026

1. About the Australian Trucking Association

The Australian Trucking Association (ATA) is a united voice for our members on trucking issues of national importance. Through our eleven member associations, we represent the 60,000 businesses and 200,000 people who make up the Australian trucking industry.

2. Introduction

The *Heavy Vehicle National Law Amendment Act 2025* (Qld) is expected to commence mid 2026.

The Heavy Vehicle National Law (HVNL) is a co-operative national scheme hosted by Queensland. It is used in New South Wales, Victoria, South Australia, Tasmania and the ACT as well as in Queensland. The law is administered by the National Heavy Vehicle Regulator (NHVR).

The ATA welcomes the opportunity to provide feedback on the NTC's consultation overview regarding amendments to the *Heavy Vehicle (Mass, Dimension and Loading) National Regulation*. We acknowledge the extensive consultation undertaken and commend the commission for progressing these reforms.

ATA strongly supports increases to vehicle mass and dimension limits as essential measures to improve heavy vehicle productivity. Without these changes, the growing freight task will exacerbate congestion, road safety risks, and emissions. However, ATA notes that the proposed changes represent only incremental improvements and questions whether they are sufficiently ambitious to meet future freight demands.

We also highlight concerns about potential responses from road managers, who may impose local restrictions that undermine the intended benefits. Understanding and securing road manager support is critical to avoid unintended consequences such as reduced access and productivity.

This document sets out the ATA's response to the detail of the following regulation changes—

- increasing the general mass limits to reflect concessional mass limits
- increasing the prescriptive length limit from 19m to 20m
- including Euro VI compliant prime movers being used in road train combinations within the scope of vehicle eligible for the Euro VI mass limit increase

25 National Circuit, Forrest ACT 2603

P 02 6253 6900 E ata@truck.net.au W www.truck.net.au ACN 055 583 714 ABN 25 055 583 714

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- changing the tow mass ratio for tag trailer combinations
- increasing vehicle height from 4.3m to 4.6m, and
- establishing a tri-axle converter dolly substitution tare mass concession.

3. Increasing the general mass limits to reflect concessional mass limits (Amendment of Section 3 – Definitions)

The ATA supports aligning GML with current CML and repealing CML arrangements. This will deliver modest productivity gains for mass constrained operations, provided access is not restricted at state or local levels.

This change will also effectively close the gap between GML and HML. With only a 5% difference in allowable mass, some operators may opt out of HML accreditation, effectively retaining part of their current productivity advantage while reducing the significant red tape burden associated with NHVAS accreditation.

Partly for this reason, ATA regrets that no changes are proposed for Higher Mass Limits (HML). To remain an attractive option that encourages voluntary entry into best practice accreditation systems, the HML rules must also be improved. Reforming only part of the mass framework creates duplication and delays broader productivity improvements.

Key considerations:

- **Quad axle groups:** Retaining mass limits tied to triaxle settings perpetuates productivity disadvantages for quad and larger axle groups.
- **Removal of 5% gross mass restriction:** Supported, but benefits are minor due to remaining GCM caps. Revising or removing these caps would deliver greater gains.
- **Removal of 1-tonne triaxle mass transfer allowance (1TMTA):** ATA opposes this removal, as the allowance provides operational flexibility without compromising safety.
- **Axle spacing mass limits:** Clarification is needed on how new GML settings interact with bridge formula calculations to avoid unintended consequences.

4. Increase in the prescriptive length limit from 19m to 20m (Amendment of sections 5C, 5D, 5E)

ATA supports this change as a sensible step to improve productivity for volume-constrained operations. However, benefits will depend on consistent access arrangements.

Specific concerns:

- Limiting the extra metre to truck length only for truck and trailer combinations restricts flexibility. Operators should be able to allocate the additional length where most beneficial.
- Internal dimension ratio settings appear overly restrictive and confusing. ATA recommends exploring alternatives to remove these controls.

- Defining the swept path to 7.4m which is an increase in the swept path performance criteria for general access heavy vehicles.
- The potential for 20m general access heavy vehicles to become a regulatory and enforcement challenge.

The ATA would like to see further transitions of vehicles operating under permits and notice migrated to general access.

5. Including Euro VI compliant prime movers being used in road train combinations within the scope of vehicle eligible for the Euro VI mass limit increase (Amendment of Sch 1, s 5 (Mass limits relating to axle spacing generally))

The ATA supports extending Euro VI axle mass concessions to prime movers in road train configurations. This corrects previous oversights and supports the transition to cleaner, safer vehicles.

However, the proposed concessions do not fully offset the additional tare mass of Euro VI equipment. The ATA recommends increasing allowances for twin steer vehicles by an additional 0.5 tonnes to address longstanding inequities.

Consideration and flexibility must be granted to **permit distribution of additional Euro VI related mass concessions over front axles, drive axles or a combination of both.**

There is further work to progress to permit road train front axle limits to 7.6t.

6. Changes to the tow mass ratio for tag trailer combinations (Amendment of Sch 1, s 2 (4A))

The ATA supports increasing the current 1:1 tow mass ratio and welcomes the revised 1:1.3 limit. While this is an improvement, some operators such as truck and tag trailer combinations hauling mobile plant may still face unreasonable restrictions.

The ATA maintains that a **definition of a minimum truck wheelbase** to address valid concerns of vehicle pitch, yaw, jounce and general drive quality issues. Outlining a standard of the **greater of 20% of the vehicle mass or the minimum manufacturer steer axle mass** would address vehicle dynamic issues such as steering and braking.

7. Increasing vehicle height from 4.3m to 4.6m

The ATA acknowledges that the proposed increase in maximum vehicle height from 4.3 m to 4.6 m is outside the scope of this current consultation and will be considered through a future process. The ATA supports progressing this reform and looks forward to engaging with the NTC when formal consultation commences.

We note that, in moving towards a 4.6 m height standard, some transportable commodities may not meet existing SRT thresholds, and additional measures such as requiring TEBS in certain applications may be appropriate.

8. Tri-axle converter dolly substitution tare mass concession

The omission of this concession creates a significant and unjustified productivity penalty for operators who choose to substitute tri-axle converter dollies for tandem axle dollies in modular combinations such as Type 1 Road Trains (A-doubles). Tri-axle dollies deliver demonstrable safety and performance benefits: they provide superior stability, track more predictably, offer improved braking performance, and distribute load more evenly across the pavement.

Operators routinely note that while tandem dollies require constant monitoring in the mirrors to ensure they are behaving, a tri-axle dolly can be relied upon to track straight enhancing both safety and driver workload. Given these advantages, it is counter intuitive to penalise operators for selecting the safer, more road friendly option.

The intent of the concession is simply to offset the higher tare mass of tri-axle dollies so that operators can maintain equivalent carrying capacity. Without it, operators lose GCM solely due to unavoidable tare differences, not because of any increased risk or infrastructure cost.

This proposal aligns strongly with the HVNL's guiding principles of efficiency, safety, and consistency. Comparable mass transfer allowances already exist such as the one tonne tri-axle transfer and the emissions based Euro VI concession demonstrating a clear policy precedent. Incorporating this measure would close an existing policy gap, maintain productivity neutrality, and ensure nationally consistent treatment of higher performing equipment without compromising safety or pavement longevity.

We therefore urge the NTC to include this concession within the HVNL (MDL) forward work program or incorporate it into HVNL maintenance activities.

9. Conclusion

ATA supports the proposed amendments as positive steps toward improving heavy vehicle productivity and sustainability. However, we urge the NTC to:

- Consider more ambitious reforms to meet future freight demands.
- Address remaining inequities in mass limits and concessions.
- Engage with road managers to ensure consistent access and avoid unintended restrictions.

The ATA notes that there are important issues that warrant further attention, either during implementation of the package or within a future work program. We seek the opportunity to meet with the NTC to discuss these matters in more detail and to identify the most effective way to progress them collaboratively.