

19th January 2026

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

Via Email: enquiries@ntc.gov.au

Re: Heavy Vehicle (Mass, Dimension and Loading) National Regulation Amendment.

1. Introduction

Grain Trade Australia (GTA) welcomes the National Transport Commission's (NTC) Heavy Vehicle (Mass, Dimension and Loading) National Regulation Amendment consultation.

The Australian grain industry plays a vital role in the nation's economic strength and the wellbeing of rural communities. It is the foundation of domestic food and feed industries, supports food security, delivers significant export earnings, and creates jobs and income across both regional and metropolitan areas. Ensuring the sector continues to thrive and expand relies on having a **streamlined, high-performing supply chain**.

2. Grain Trade Australia's Role

Grain Trade Australia (GTA) is a national member association and is the focal point for the commercial grain industry within Australia. Grain Trade Australia is the peak industry body representing the commercial grain supply chain in Australia. GTA's members include grain marketers, storage and handling companies, transport operators, exporters, and technology providers. GTA works to:

- Promote trade facilitation and supply chain efficiency
- Develop and maintain industry standards, codes of practice, standard form contracts and trade rules
- Advocate for regulatory frameworks that support safe, efficient, and competitive grain supply chains
- Provide training, technical guidance, and dispute resolution services to support industry professionalism and compliance.

GTA's mission is to 'facilitate trade' in the Australian grain industry. Its products and services, including the Australia Grain Industry [Code of Practice](#), and the [Grain Transport Code of Practice](#) provides a self-regulatory framework across the grain industry to facilitate and promote the trade of grain across the Australian grain value chain.

Within this context, on behalf of its members ([Link: here](#)), GTA provides comment on the amendment to the Heavy Vehicle (Mass, Dimension and Loading) National Regulation (HVNR).

3. Feedback on the Proposed Amendments Reforms to the HVNR

The majority of GTA members are participants in the grain supply chain and are heavy users of road transport services. Some GTA members are also owners and operators of heavy vehicles.

In 2023 GTA examined the *Consultation Regulation Impact Statement* that included the proposed changes that are now the subject of draft regulation amendments. In its [Submission](#) GTA:

1. agreed with the logic that supported the proposed changes;
2. noted the reforms and the suggested changes may not have any material adverse impact on the current operations of road freight in the grain industry; and
3. supported the changes as they will simplify and clarify areas of concern that transport companies have around Fatigue Management, Access and details relating to the National Audit Standard.

As part of this process GTA has now **examined the proposed draft amendments to the NHVR regulations** and confirms that, in its assessment, the content is accurate, workable, and technically robust. The revisions appear to be well-considered and aligned with practical industry requirements, providing a sound basis for effective implementation.

4. Ongoing Reform Required

The Australian grain industry operates within an increasingly competitive global marketplace, where international pressures directly influence domestic outcomes. To maintain a strong position, the sector must continually pursue supply-chain innovation. This requires clear strategic leadership, thoughtful long-term planning, and sustained capital investment to build and preserve an efficient, globally competitive grain supply chain.

At the same time, global food security is becoming both more significant and more complex. Ongoing geopolitical conflicts, environmental pressures, and climate-related disruptions continue to challenge the stability of food production and distribution worldwide. As these issues intensify, the ability to move food reliably between nations and commercial partners becomes even more critical. The growing emphasis on global food security highlights the central role of efficient, resilient trade and supply-chain systems.

Given these pressures, it is essential that government investment and **broader structural reforms** keep pace. Strengthening and modernising supply chains will ensure they remain robust, adaptable, and capable of responding to evolving market needs—supporting both national prosperity and Australia’s contribution to global food stability.

5. Conclusion

The Australian grains industry is an extensive user of the national freight network and supply chain and is consequently significantly impacted by its efficiency in terms of costs, investment, regulation and overall productivity.

GTA supports the draft regulation amendments and welcomes continued reforms and further focus by Governments on the supply chain and its regulatory environment to ensure the grain industry can continue to provide economic value to the nation as a whole.

Yours faithfully,

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Pat O’Shannassy
CEO, Grain Trade Australia