

27 January 2026

Ms Carolyn Walsh
Commission Chair
National Transport Commission
Level 3/600 Bourke Street
Melbourne VIC 3000

via email: hvnltteam@ntc.gov.au

Dear Ms Walsh

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

The Australian Small Business and Family Enterprise Ombudsman (ASBFEO) welcome the opportunity to comment on the Heavy Vehicle (Mass, Dimension and Loading) National Regulation Amendment 2025. Ensuring the regulatory changes are supported with clear and practical guidance is crucial to help small and family-owned heavy vehicle businesses to understand their obligations.

Small and family businesses form the backbone of Australia's heavy vehicle transport industry. Small businesses dominate the sector as approximately 70 per cent of Australia's road freight businesses operate a single truck with a further 24 per cent operating fleets of two to four vehicles.¹ These businesses play a vital role in transport industry and in supporting key sectors such as agriculture and construction, particularly by maintaining regional freight connectivity. However, their limited scale and resources mean that they are sensitive to compliance costs, regulatory changes and net-zero transition pressures, especially given their tight operating margins compared with larger business.²

ASBFEO supports the policy intent of the proposed amendments to support the new Heavy Vehicle National Law accreditation and safety assurance framework. Higher mass and length limits are expected to deliver productivity and cost benefits by allowing more freight per trip and lowering maintenance and fuel costs. While this may be beneficial, the reduction in the number of trips for small and family businesses may have the unintended consequence of reducing their income, depending on whether they are paid per load, per hour or per kilometre.

Expanding Euro VI concessions to road trains comprising a Euro VI compliant prime mover can provide new opportunities for small businesses. However these benefits, may be limited by the significant upfront costs to purchase a Euro VI compliant vehicles.

Small and family businesses can often face challenges in understanding changes to regulations. Owner drivers of heavy vehicles are often working in their business and do not have sophisticated administrative support teams such as legal or human resources to understand regulatory changes. Without dedicated and accessible resources, small and family business may overlook these

¹ Department of Transport and Main Roads, *Heavy Vehicle National Law Amendment Bill 2025 – Impact Analysis Statement*, Queensland Government, September 2025.

² National Road Transport Association (NatRoad), *Road to 2028: Road freight reform priorities for the 48th Australian Parliament*, NatRoad, February 2025, accessed 20 January 2026, p 16.

important changes due to their limited time and financial resources. The ASBFEO recommends the regulator provide fact sheets tailored for a small and family business audience, distributed through trusted advisors and peak industry bodies representing small business in the heavy vehicle sector.

The ASBFEO supports the objectives of the Amendment Regulation and urges implementation that supports small and family businesses to understand the changes and the implications for their operations.

If you require any further information, please do not hesitate to contact the Policy and Advocacy team via email at advocacy@asbfeo.gov.au.

Yours sincerely



The Hon Bruce Billson

Australian Small Business and Family Enterprise Ombudsman