



SUBMISSION

Submission: NZ truck loading code consultation

To: NZ Transport Agency Waka Kotahi
tlcconsultation@nzta.govt.nz

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About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) is a national membership association representing the road freight transport industry. Our 1,200 members (with a combined fleet of 14,000 heavy vehicles) operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand helps trucking operators drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

Submission on the official NZ truck loading code consultation

Introduction

- 1 Transporting New Zealand appreciates the opportunity to provide a submission on NZTA's proposed changes and additions to the official NZ truck loading code. We sought feedback from our membership on the revisions which has informed our recommendations.
- 2 Transporting New Zealand is committed to supporting practical safety improvements in the road freight industry. This has included working with the NZ Intermodal Transport Safety Group and WorkSafe to develop [Good Practice Guidelines for the safe operation and maintenance of truck and trailer mounted container cranes](#), providing detailed feedback and recommendations on the [Approved Code of Practice for Loading and Unloading Cargo at Port and on Ships](#), and our membership and active participation in the [Business Leaders Health and Safety Forum](#).
- 3 Transporting New Zealand supports the inclusion of new sections for loads transported by A-frames, containment by body, and curtain-sided vehicles, we have reservations about the requirements for A-frames or load anchorage points to be certified, and suggest the additional text be less prescriptive.
- 4 There is nothing confidential in our submission and we permit it to be published in full.

1: Items transported using A-frames

- 5 Transporting New Zealand does not support the requirement that A-frames for concrete must be certified as per page 5 of the draft: *"An A-frame designed to support more than 1 tonne must be certified to NZS 3404 and fitted with a plate that meets the requirements of that standard."*
- 6 We also do not support the requirement that the deck or chassis must have certified load anchorage points.
- 7 Many operators only rarely transport concrete panels, so requiring certification will restrict productivity and increase cost (a straightforward LT400 typically costs \$500), and limit their transport to fewer operators which will reduce competition.
- 8 No background information has been provided to suggest that certification is needed because of a compelling safety risk and history of accidents from unsuitable A-frames. In fact, road freight transport workplace injury claims have [fallen by 35 per cent between 2018 and 2025](#) despite an increase in the national freight task.
- 9 Regarding securing the A-frame to the deck or chassis, we suggest 'J' hooks and twist locks etc. will not be practical for all panel shapes and sizes. However, we endorse the sentiment in the subsequent paragraph using restraints and anchorages except, as noted above, we do not support these needing to be certified to a NZ Standard.

10 Operators have advised us that the 1 metre maximum overhang requirement on page 5 may not always be practical or achievable.

2: Containment by body

11 Transporting New Zealand does not support the suggested text that machinery can be carried in tipper bodies without being secured by anchorages. We suggest that if operators want to carry anything other than tipping loads in a tipper body, then the body must have the appropriate load anchors in the back of the tipper to properly secure the machine. Securing the machine either by the tipper body if movement is less than 100mm, or by dunnage, is inadequate in our opinion, and inconsistent with other sections of the code.

12 If timber was used as baulking to prevent machines from moving in the tipper, this could place reliance on the tailgate to restrain the load, which is not what they are designed for, hence the machine should be anchored as per our comment above.

3: Curtain-sided bodies

4: Hay bales

13 Transporting New Zealand has no comments on the new section on curtain-sided bodies, or the addition to the 'loose bulk loads' section on hay bales.

ENDS