

AustRoads
Level 9,
570 George Street
SYDNEY NSW 2000,
Via email: driver@austrroads.com.au



23 September 2022

To whom it may concern,

Re: National Heavy Vehicle Driver Competency Framework- Consultation Regulation Impact Statement

The Victorian Farmers Federation (VFF) welcomes the opportunity to comment on the National Heavy Vehicle Driver Competency Framework- Consultation Regulation Impact Statement.

Access to skilled and competent heavy vehicle drivers is critical for Victoria's \$17 billion agriculture industry. Farm businesses require a high number of qualified heavy vehicle drivers to operate b-doubles and other high productivity vehicles during key production periods such as harvest to transport food and fibre to market. Like the broader heavy vehicle industry, agriculture is facing a debilitating skills shortage that has been exacerbated by COVID-19. Without access to qualified drivers, farms businesses are unable to fill employment vacancies or are forced to operate less efficient vehicles to transport their produce to market. With a growing freight task and evolving fleet, this problem will only continue to snowball without significant government intervention.

Whilst addressing safety must be the core focus of any licensing scheme, the VFF are concerned that the structural barriers for new entrants and diversity of businesses within the heavy vehicle industry have not been sufficiently acknowledged throughout the proposed reforms. Heavy vehicle drivers are not a homogenous group in terms of the freight task or the environment in which they operate, and it is critical the licensing system must reflect this diversity.

The VFF makes the following comments about the Regulation Impact Statement:

1) Increasing the amount of skilled and competent heavy vehicle drivers must be a key objective of the framework

As noted by AustRoads Chief Executive Geoff Allan, "With a growing freight task and changing vehicle fleet, Australia needs a lot of well-trained and capable heavy vehicle drivers. That starts with effective driver licensing,".

This not reflected within the objectives of the RIS, however, with reference to driver availability only in the secondary objective 'Not compromising the availability of heavy vehicle drivers and supporting use of high productivity vehicles' which fails to sufficiently acknowledge and address the significant shortage of drivers. Noting the detrimental impact a shortage of skilled heavy vehicle drivers will have for the Australian economy, it is critical this is included a key objective of the RIS.

2) The RIS fails to identify the structural barriers within the current licensing system that are deterring new entrants as a problem

The current time-based graduating licensing system is delaying and deterring drivers from pursuing careers in the heavy vehicle industry, exacerbating the current shortage of drivers, especially in high productivity freight vehicles. There are countless examples of young potential drivers leaving the industry to pursue alternate careers due to the delay in progressing through licensing gradings, especially when employers cannot always support them. This is particularly damaging to the agriculture industry that often face a limited labour pool and are prevented from harnessing an existing base of young and local workers who have demonstrated competency to drive heavy vehicles but cannot gain a licence.

By not identifying this as a problem with in the RIS, proposed reforms risk replicating the structural barriers in future frameworks.

3) The proposed additional supervised driving requirements are not appropriate for small businesses

Many small businesses, especially in regional areas, are already facing significant shortages of skilled drivers and may not have the available staff for supervising new drivers. Similarly, the volume of hours requested would not be feasible for many farm businesses that only use their heavy vehicles for short production periods such as harvest. It is critical that any proposed changes to licenses are appropriate for small and family-owned business which make up nearly 98% of trucking operators in Australia.

3) Ensure licensing pathways are flexible and reflect modern usage

While the VFF strongly supports the development of flexible pathways to higher classes of licenses, the proposed changes do not go far enough. The continued pathway from heavy rigid to heavy and multi-combination vehicles is not suitable for farm businesses and appears to be based on historic practice rather than safety. As noted in AustRoads 2018 Review of the National Heavy Vehicle Driver Competency Framework:

“While regulators are rightly concerned about safety, there is no evidence that safety outcomes are improved when people have had experience driving rigid vehicles before they progress to combination vehicles – a proposition which is yet to be researched or tested.”

It is important to note that very few farm businesses operate rigid vehicles anymore therefore limiting the ability of farms to provide training and employment whilst drivers complete their licensing pathways.

4) Retain a single Multi Combination license class

The VFF are deeply concerned that the proposed sub class of 3 multi combination licenses creates significant burden on industry, deterring the use of high productivity vehicles with minimal evidence base. The example of drivers struggling to transition between driving B-doubles to more complex

MC vehicles listed in the RIS is anecdotal and is demonstrative of the need for targeted workplace training rather than separate licenses. As noted in the 2018 AustRoads report:

“Given the wide variety of work environments and the consequent variation in responsibilities that will accrue to a heavy vehicle driver in different roles, it is unreasonable to expect a heavy vehicle licence to fully equip a person for the potential and actual breadth of their job responsibilities. The types of vehicles that people will drive and the workplace requirements will vary substantively between employers.”

The VFF looks forward to continuing to work with AustRoads to improve heavy vehicle licensing. Please contact the VFF Policy team at policyteam@vff.org.au you have any queries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Emma Germano', with a stylized flourish at the end.

Emma Germano

President

Victorian Farmers Federation