CEMENT CONCRETE & AGGREGATES AUSTRALIA

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Road Safety Victoria
Department of Transport and Planning
Email: hvdsr@transport.vic.gov.au

Heavy Vehicle Driver Safety Reform – Victorian Regulatory Impact Statement

Dear Heavy Vehicle Driver Safety Reform Team,

As the voice of the heavy construction materials industry Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to represent industry on the Training and Assessment Advisory Panel (TAAP) and provide a written submission on the Victorian Regulatory Impact Statement (RIS) to update its heavy vehicle driver licensing system.

CCAA members produce the majority of Australia's cement, concrete, and aggregates, that are crucial to Australia's building and construction sectors, underpinning the delivery of housing and infrastructure. Their transport requires competent drivers operating across public roads, quarries, concrete plants and construction sites. Licensing arrangements must address these operating environments and allow businesses to recruit, train and retain drivers without unnecessary regulatory duplication.

CCAA supports the hybrid option as the preferred approach to heavy vehicle driver safety reform, subject to national consistency being established as a minimum requirement for implementation. The reform should improve driver competency and road safety while maintaining practical workforce entry and progression pathways for the construction materials industry.

The hybrid option provides a reasonable balance between stronger training standards, targeted eligibility controls and workforce access. The RIS models outcomes and costs, dependent on effective delivery and the assumptions used in the analysis. They support the proposed direction while reinforcing the need to monitor actual safety, cost and workforce impacts throughout transition and implementation.

1. National consistency as a minimum requirement

The RIS identifies inconsistent application of heavy vehicle competency standards across jurisdictions as a core issue, however national harmonisation is only considered as a secondary objective. CCAA recommends that national consistency be treated as a minimum implementation requirement and an explicit measure of reform success. A national framework should deliver equivalent competency and eligibility outcomes regardless of where a driver is trained or licensed. This is essential given that heavy vehicle drivers work across state boundaries.

National consistency must extend beyond recognition of the final licence. Drivers and employers should be able to rely on equivalent requirements for training, driving experience, coaching and eligibility screening across jurisdictions. Differences in administrative delivery may be manageable where they do not create different safety thresholds or require applicants to repeat equivalent training.

Cement Concrete & Aggregates Australia

National Office
Suite 4, Level 2
201 Coward Street
Mascot NSW 2020

Postal Address
PO Box 124
Mascot NSW 1460

+61 2 9667 8300
info@ccaa.com.au
ccaa.com.au

CCAA recommends nationally agreed arrangements covering minimum practical training hours and competencies, assessment methods, trainer and coach qualifications, and the recording and verification of driving experience. Eligibility rules should use common definitions of relevant licence bans and lookback periods. Interstate and overseas driving history checks should apply equivalent standards of verification.

Equivalent training, coach credentials and verified experience completed interstate should be recognised without duplicate assessment or additional state-specific requirements. A coordinated commencement program is also needed to reduce incentives for licence shopping and disruption to Victorian training providers, particularly near state borders.

2. Support for the hybrid design choices

2.1. Training providers and trainer qualifications

CCAA supports the nationally agreed enhanced competencies and mandatory minimum training times, including practical behind-the-wheel requirements. Training hours must be supported by consistent assessment of demonstrated competence.

CCAA supports retaining Victoria's registered training organisation requirement and strengthening qualifications for new trainers and assessors. These measures should provide reliable oversight and improve training quality. The final Certificate IV requirement should be agreed nationally, reflect practical heavy vehicle instruction skills, and include suitable recognition of prior learning. Transition arrangements must preserve access to experienced trainers and adequate regional training capacity.

2.2. Licence bans and the two-year lookback

CCAA supports eligibility screening based on relevant road safety licence bans, with a two-year lookback measured from the end of the ban. This provides a clearer and more proportionate approach than a broader, more complex offence schedule. National guidance should define relevant bans, distinguish them from administrative suspensions unrelated to road safety, and explain treatment of overlapping bans and interstate and overseas records. Applicants need timely reasons for decisions and an accessible review process.

2.3. Probationary drivers and workforce entry

CCAA supports retaining access to medium rigid and heavy rigid licences for probationary drivers. This is important for young people entering concrete delivery and other heavy construction materials roles. We support restricting alternative progression pathways to full licence holders as part of the hybrid option, provided the restriction is applied consistently nationally and reviewed against actual safety outcomes. Clear guidance should explain the pathways that remain available to probationary drivers.

3. Safe and practical licence progression

3.1. Progression through heavy combination licences

CCAA supports requiring applicants to hold a heavy combination licence before progressing to a multi-combination licence. Experience with heavy combination vehicles provides a

relevant foundation for operating more complex configurations. Required holding periods, experience thresholds and assessment rules should be nationally consistent.

3.2. Coaching in the current licence category

CCAA supports allowing coached experience in vehicles matching the driver's current licence category. This makes participation more feasible for businesses that cannot readily provide a vehicle in the target category. Coaching in the current category must complement the training and assessment required to demonstrate competence in the target category before a licence is issued.

3.3. Heavy vehicle coach requirements

CCAA supports coaches holding a current full licence in the relevant category, at least three years of experience holding that category, an appropriate driving record and a targeted micro-credential. The meaning of a clean driving record should be defined nationally and linked to relevant safety risks. Coach approval and credentials should be portable across jurisdictions, with straightforward registration and renewal processes.

The experience and coached pathways should use simple records that can be verified without excessive administration. National guidance must clearly distinguish eligible on-road driving hours from loading, waiting and other work. Productivity targets should not encourage drivers to accumulate hours at the expense of fatigue management or safe operating practices.

4. Training relevant to construction materials transport

The RIS recognises concrete agitator drivers as a distinct cohort (cohort 4), with operational risks involving vehicle dynamics, rollover awareness, reversing and interaction with construction sites. CCAA supports enhanced competencies addressing these tasks. National training materials should include realistic construction materials examples, supported by practical assessment.

Relevant content should cover the changing stability characteristics of loaded agitators, safe cornering and manoeuvring, site access, reversing with appropriate controls, and interaction with workers, onsite machinery and other road users. For quarry and bulk materials transport, training should also address load security, vehicle stability and safe tipping on suitable ground. Industry should help validate these examples within the common national curriculum.

Local and site-based driving has specific risks even where journeys are short. The curriculum should address those risks alongside highway and long-distance operations. Employers should continue vehicle-specific induction and supervised familiarisation, building on the nationally consistent licensing standard.

5. Recruiting and retaining heavy vehicle operators

Recruiting and retaining suitably skilled heavy vehicle operators is a significant industry challenge and must be considered in the design and implementation of the reforms. The RIS projects demand for more than 21,000 additional heavy vehicle drivers in Victoria by 2034.

This is a statewide estimate rather than a heavy construction materials workforce forecast, but it highlights the wider competition for drivers that materials producers face.

5.1. Recruitment and development of new operators

Heavy construction materials businesses need operators who can safely manage specialised vehicles and work confidently around quarries, plants and construction sites. Obtaining a licence is only the first step. Employers must also invest in vehicle familiarisation, supervised driving and site safety training before a new operator can work independently. Recruiting a licensed driver therefore does not necessarily resolve an immediate shortage of experienced operators.

Employers compete for drivers with other freight and transport sectors. Regional businesses may have a smaller local pool of suitable applicants and fewer nearby training providers. Higher course costs, training delays and time away from paid work can discourage new entrants and people considering a career change. Smaller businesses may also have limited capacity to fund training or release experienced operators to coach new recruits. Consideration should be given to providing state funded training for smaller and regional businesses.

Maintaining probationary driver access to medium rigid and heavy rigid licences is therefore an important feature of the hybrid option. Affordable entry, accessible training and clear progression pathways should help businesses develop new operators while requiring them to meet the common national safety standard.

5.2. Retention and continuity of experience

Retention requires an understanding of the practical demands of the work, including early starts, variable delivery schedules, interaction with busy construction sites and the responsibility of operating specialised vehicles. These demands can affect the attractiveness of the role and make effective induction, supportive supervision and opportunities for development particularly important.

When an experienced operator leaves, the business loses operational knowledge as well as driving capacity and must invest in recruiting and training a replacement. Clear career pathways and structured coaching can support retention by allowing operators to develop their skills and experienced drivers to contribute as mentors. National recognition of qualifications and experience should make these pathways easier to understand and administer.

5.3. Workforce safeguards within the reform

CCAA recommends that DTP assess the cumulative workforce effects of training costs, provider capacity and eligibility restrictions before commencement. Targeted assistance for new entrants, practical support for employer coaching and shared training arrangements should be considered where access barriers are demonstrated. Existing competent operators should receive clear transition advice, so uncertainty does not discourage continued participation.

Monitoring should include vacancies, recruitment lead times, turnover and retention of new operators, alongside licence uptake and safety outcomes. Industry engagement is needed to

distinguish the effects of licensing reform from wider employment conditions and to identify emerging shortages early. Workforce pressures must be addressed while maintaining the nationally agreed safety and competency requirements.

6. Implementation and affordability

CCAA supports staged implementation, with commencement tied to demonstrated readiness of national materials, systems and training capacity. Before each phase, DTP should publish the agreed requirements, recognition arrangements, fees and transition guidance. Training providers and employers need sufficient time after these details are settled to prepare staff and systems.

CCAA supports preserving existing licence endorsements and avoiding retrospective application of the new eligibility exclusions. Final guidance should explain treatment of applicants already enrolled, existing trainers and coaches, and offences and bans that span the transition. Nationally coordinated arrangements should prevent drivers from being disadvantaged solely because jurisdictions commence at different times.

The total cost of reform should be transparent before implementation, including course fees, coach credentials, licensing charges, travel and time away from work. Additional costs can affect young entrants, small businesses and regional operators disproportionately. Cost recovery should be proportionate and avoid duplicate charges across jurisdictions. Where access barriers are demonstrated, targeted training assistance and shared coaching arrangements should be considered.

7. Monitoring and evaluation

Evaluation should measure safety outcomes alongside licence applications, completion rates, waiting times, training costs, provider availability, workforce entry and operator retention. Results should be reported by licence category, region and relevant industry cohort, including concrete agitator drivers where data is available. Exposure measures such as distance travelled or driving hours should be used where available to support meaningful safety comparisons.

CCAA recommends an early implementation review within 12 months of each major phase, followed by a national outcome review once sufficient data becomes available. Reviews should assess cross-border differences, licence shopping, access to regional training and whether the hybrid restrictions remain proportionate. Findings should inform coordinated adjustments across jurisdictions.

8. Conclusion

CCAA recognises the importance of heavy vehicle driver safety reform and the need to improve driver competency while maintaining practical workforce entry and progression pathways for the construction materials industry.

It remains essential that in achieving the desired outcomes that a balance is achieved with a focus on national consistency and ensuring licencing does not become cost prohibitive. In summary CCAA supports:

- Adoption of the hybrid option, with national consistency as a minimum implementation requirement.
- Publishing of agreed standards with clear implementation pathways and timings.
- Ongoing monitoring and evaluation of reforms against safety benefits, costs and workforce impacts.
- Confirm portable recognition of equivalent training, experience and coach credentials, supported by coordinated commencement and reliable history checks.
- Address recruitment and retention challenges through accessible training, practical coaching and fair transition arrangements, supported by one clear timetable.
- Engage the construction materials industry in curriculum validation and review actual safety, affordability, recruitment and retention outcomes.

CCAA thanks the Department of Transport and Planning for their engagement on the proposed changes and look forward to working collaboratively to achieve a successful outcome.

Should you wish to discuss this matter, please contact CCAA's State Director - Victoria. Ms. Tara McCormack by email tara.mccormack@ccaa.com.au and/or by phone

Yours sincerely

MICHAEL KILGARIFF
Chief Executive Officer