



October 2026

## Victorian heavy vehicle licence reform: LBRCA response to consultation

### Response to the Victorian Heavy Vehicle Driver Safety Reform Regulatory Impact Statement

LBRCA supports, in principle, Heavy Vehicle Driver Safety Reform, but says licence progression must be based on demonstrated competence and supervised experience, not tenure alone. The framework must also work for small and regional transport operators. Reforms should recognise efforts underway to address driver and workforce shortages, including:

- National Heavy Vehicle Driver Competency Framework
- National Heavy Vehicle Driver Action Plan
- Reforms in other jurisdictions related to licensing, competency-based progression and recognition of overseas driver licensing.

### About LBRCA

The Livestock, Bulk and Rural Carriers Association is the peak body representing rural carriers. We represent livestock, bulk and rural transport operators moving essential agricultural products throughout regional and rural Australia. The association advocates for safer roads, more productive freight movements and proportionate regulation.



### **LBRCA's position**

The Livestock, Bulk and Rural Carriers Association (LBRCA) supports the direction of Victoria's Heavy Vehicle Driver Safety Reform and the proposed hybrid approach to heavy vehicle licensing. Reform should raise safety standards while establishing practical, supervised pathways that recognise demonstrated driving competence, genuine workplace experience and the needs of rural freight operators.

LBRCA's central concern is that a new competency-based framework must not reproduce the limitations of the current time-served system. A driver's ability to operate a heavy combination (HC) or multi-combination (MC) vehicle safely should be judged by demonstrated capability, supervised experience, a satisfactory driving record and independent assessment—not simply time spent holding a lower licence class.

For livestock, bulk and regional freight businesses, the ability to train and retain skilled drivers is critical. Reform that is accessible only to large fleets or metropolitan training providers will not deliver its intended workforce and safety benefits.

### **Recommendations for reform**

1. Provide an alternative HC/MC licence progression pathway based on recorded supervised driving experience and independently assessed competence, rather than fixed licence tenure alone.
2. Enable suitably trained young people, new entrants and probationary licence holders to participate in structured, safeguarded progression pathways such as a rural cadetship, where safety and competency requirements are met.
3. Preserve a clear distinction between registered training organisation (RTO) assessment and supervised workplace coaching delivered by appropriately experienced transport operators.
4. Apply trainer and coach requirements proportionately, including recognition of prior learning, relevant practical experience and accessible training arrangements for regional areas.
5. Use risk-based eligibility criteria that consider serious safety-related driving offences, recent conduct and evidence of rehabilitation, without automatically excluding applicants for minor unrelated matters.
6. Resolve insurance, liability, record-keeping and interstate recognition before full implementation, with particular attention to small and regional businesses.
7. Pilot alternative progression pathways with rural operators ahead of the proposed December 2027 commencement and protect existing licence holders during transition.



### **1. Recognise competence, not simply licence tenure**

LBRCA does not support fixed HC tenure as the decisive requirement for progression to an MC licence. Time holding a licence is an imperfect proxy for real-world capability. A driver may accrue little relevant driving experience during a prescribed period, while another may complete substantial, closely supervised commercial freight work.

A standard tenure-based pathway can remain available, but it should be complemented by an alternative pathway with these safeguards:

- a defined minimum of relevant, recorded supervised driving experience
- demonstrated competency in the vehicle and task
- independent assessment
- a satisfactory safety and driving history
- appropriate oversight by the employer or training provider.

Importantly, training must develop the ability to operate safely in a commercial freight environment, not merely prepare an applicant to pass a short vehicle-handling assessment. This distinction is especially relevant where HC and MC configurations are the vehicles routinely used in rural operations.

### **2. Open safe pathways for younger drivers**

LBRCA supports maintaining access to medium rigid (MR) and heavy rigid (HR) licences for eligible probationary drivers. Probationary status should not, by itself, prevent a person from entering a structured heavy vehicle training pathway.

LBRCA also opposes an automatic exclusion of probationary drivers from alternative or accelerated HC/MC progression. The appropriate test is whether the individual can demonstrate safe driving behaviour, complete the required supervised hours, meet the competency standard and pass an independent assessment. Additional controls may be appropriate for newer drivers.

Victoria should work towards a supervised, competency-based route that brings suitably prepared 18+ year-olds into HC/MC driving under controlled conditions. This would offer a meaningful pathway into rural and regional transport careers while retaining the protections appropriate to learner and newly licensed drivers.

### **3. Protect training quality without new or unnecessary red tape**

LBRCA recognises the importance of professional, consistent and defensible licence training and assessment. It neither endorses nor rejects an RTO-only model without qualification; any formal registration requirement must preserve the capacity for approved operators or similar alternatives to deliver structured workplace development and supervised experience.



LBRCA does not support a blanket Certificate IV or similar mandatory requirement for new trainers and assessors without practical safeguards. Formal qualifications can support assessment integrity, but they are not a substitute for current heavy vehicle operational experience. Introducing

additional credentials before expanding driver supply could increase compliance costs, reduce regional trainer availability and delay licensing and workforce development.

Any trainer qualification model should include:

- transition arrangements and recognition of prior learning for experienced existing trainers
- a requirement for relevant practical heavy vehicle experience alongside formal qualifications
- measures to avoid regional training and assessment bottlenecks
- proportionate fees, compliance obligations and transition periods.

Formal licence assessment and workplace mentoring are different functions and should be regulated accordingly.

#### **4. Make workplace coaching practical for rural operators**

LBRCA supports coached licence progression in which supervisors hold the relevant current licence class, have meaningful recent experience, maintain an appropriate safety record, and complete a concise, practical micro-credential. The driving history test should focus on serious and safety-relevant offences rather than on an unrealistically perfect infringement record.

Workplace coaches should not be required to hold a formal Certificate IV in Training and Assessment solely to supervise and mentor drivers. The LBRCA's NSW cadetship concept provides a useful policy model: structured workplace supervision, recorded driving experience, competency development and independent assessment.

Participation rules should allow small, family-owned and regional fleets to use the pathway without duplicative RTO processes or impractical accreditation burdens. LBRCA is an industry association, not an RTO, and does not propose that an industry association should derive a commercial advantage from changes that would increase operator costs.

#### **5. Apply proportionate, safety-based eligibility rules**

LBRCA does not agree that licence bans should be the only consideration when assessing eligibility to obtain or upgrade a heavy vehicle licence. Recent serious traffic offences and substantiated unsafe driving behaviour are relevant to public safety, particularly where a person seeks accelerated progression to a higher class. Minor or unrelated infringements should not automatically disqualify applicants.

A two-year look-back period following the end of a licence ban is a reasonable baseline, but the application should reflect the seriousness, recency and relevance of offending. Longer



restrictions may be warranted for repeated high-risk conduct, while the system should also provide a fair process to consider rehabilitation, sustained safe behaviour and newly demonstrated competence or additional prior learning.

## **6. Design for regional delivery and national consistency**

A well-intended licensing reform will fail if only large fleets can meet its administrative and commercial requirements. For smaller freight businesses, the principal implementation risks are uncertain insurance and liability arrangements for higher-class supervised driving, the operational cost of releasing experienced drivers to coach, the availability of assessors, and excessive logbook, approval and reporting requirements.

LBRCA calls for early clarity on the circumstances in which supervised driving can occur in HC and MC vehicles, and how those conditions will be recognised when drivers or operators work across state borders. A Victorian-only pathway that is not portable could reduce the value of the reforms for interstate freight businesses and undermine separate efforts on harmonisation.

LBRCA broadly considers the proposed staged implementation feasible, subject to practical delivery arrangements:

### **June 2027**

Provide sufficient lead time for RTO course updates, trainer qualifications, and assessment practices and regional capacity.

### **December 2027**

Commence alternative progression pathways with clear coach criteria, record-keeping, insurance settings and employer eligibility; pilot these arrangements beforehand.

### **January 2029**

Apply changed eligibility requirements with appropriate grandfathering for existing licence holders and drivers already progressing through the system.

**Note:** Industry should be involved in the detailed design and pilots, including smaller livestock, bulk and rural freight operators. The framework must reward safe, demonstrated on-road skills, not administrative capacity or training to an assessment alone.

## **Conclusion**

Victoria has an opportunity to improve heavy vehicle safety and create a stronger entry pathway for the next generation of professional drivers. LBRCA supports reform that brings competency, supervised experience and independent assessment to the centre of licensing decisions. In addition, where reforms align with national efforts, this has a broader benefit for the transport sector and whole-of-economy.



Success will be measured by whether a capable regional driver can progress safely into the heavy vehicle combinations the industry actually uses, and whether a small transport operator can participate without disproportionate cost or red tape. In addition to attracting and maintaining new workforce participants. LBRCA encourages the Victorian Government to develop these arrangements with rural carriers before implementation.

***Publication note***

*This policy response has been edited from LBRCA's survey answers to the Victorian Heavy Vehicle Driver Safety Reform Regulatory Impact Statement. It sets out qualitative policy and operational considerations; it does not present independent cost–benefit modelling or a new supporting dataset.*