



ROAD TRANSPORT FORUM NEW ZEALAND INC

SUBMISSION ON THE

LAND TRANSPORT (DRIVER LICENSING) AMENDMENT RULE 2019

RULE 91001/13

21 March 2019

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2 MAY 2019

**ROAD TRANSPORT FORUM NZ SUBMISSION ON THE LAND TRANSPORT
RULE (DRIVER LICENSING) AMENDMENT RULE 2019 RELEASED 21 MARCH
2019**

REPRESENTATION

Road Transport Forum New Zealand (RTF) is made up of several regional trucking associations for which the Forum provides unified national representation. The Forum members include Road Transport Assns. NZ, National Road Carriers, and NZ Trucking Assn. The affiliated representation of the Forum is some 3,000 individual road transport companies which in turn operate 16-18,000 trucks involved in road freight transport as well as companies that provide services allied to road freight transport.

The Forum is the peak body and authoritative voice of New Zealand's road freight transport industry which employs 26,600 people (3.0% of the workforce), has a gross annual turnover of \$6 billion and transports about 70% of New Zealand's land-based freight measured on a tonne/kilometre basis.

The Forum members are predominately involved in the operation of commercial freight transport services both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or interregional transport.

RTF SUPPORT FOR THE REVIEW OF THE GRADUATED DRIVER LICENSING REGIME

RTF has been a leading advocate for a review of the graduated driver licensing framework as it applies to commercial vehicle drivers. This position was adopted with the goal to create an environment where driver trainees and new drivers could move through the various levels of commercial vehicle classes as expeditiously as possible.

RTF's objectives have focused on the needs of the road transport sector to access competent drivers and driver trainees, while avoiding unreasonable costs being placed upon new driver candidates and employers who might have to fund the trainees training throughout the graduated licensing scheme.

It also follows that any commercial vehicle driver licensing system will embody outcomes that meet public safety expectations. However, we would like to make it clear that in our view, training and driver knowledge applicable to a specific transport task, vehicle application, or occupational group, should always be outside the scope of any licensing regime. Occupational training related to vehicle deployment by definition falls within the domain and responsibility of the employer and must remain beyond the scope of the driver licensing framework. Our view is that licensing is

about ensuring the safe operation and control of a commercial vehicle and its interaction within the network and with other road users on that network. This particular perspective provides clarity around what the industry expects the licensing regime to achieve.

From a historical position and our members' first-hand experience, the current system was never fit for purpose. Despite the efforts of independent reviewers over the preceding years there has been little appetite, until the 2016 Discussion Document, to recognise its short comings and the costs the multi-tiered approach adopted in 1999 generated for both driver trainees and employers.

RTF'S INITIAL VIEWS ON THE DRAFT

We don't believe the driver licensing amendment, as proposed, will result in a significant impact on the uptake of new drivers, although we accept it does reduce a measure of complexity within the current regime and consequently, would help reduce costs. Even this level of change should prove more attractive to some employers who are willing to invest in training drivers.

Regrettably, the changes don't go far enough and retaining the Class 4 licence level represents an opportunity lost. The amendment rule is not a green fields approach but simply a recalibration of what was there although we cannot ignore that removal of the Class 3 licence is sensible decision, removing the L licences for levels 4 and 5 is positive, and allowing class 4F holders to drive a class 5 vehicle under supervision is also a step forward. We are not sure how effective this last amendment will be, or what the take up in practice will be, as the cost of having a supervisor in the cab is not necessarily a low or no cost option.

In summary, the draft rule largely mirrors the 2016 discussion document. Given the two training delivery streams i.e. mentored training (practical test pathway), or approved course pathway, the lack of an independent competency test remains a concern. Although the Agency is improving its contractor oversight model, as stated in Proposal 9, RTF remains sceptical that the lack of a rigorous test of the trainee's capability at the end of the training input process will produce reliable competency outcomes. The positive is that the amendment rule and accompanying Cabinet paper and Regulatory Impact Statement (RIS) acknowledge the alternative proposal put forward by RTF and supported by others. The inclusion of Proposal 9 recognises the need to more thoroughly vet course providers, but still fails to support an independent competency test of driver trainees. It appears the present model of course provision (training) and assessment still remain intrinsically linked.

SUMMARY OF RTF COMMENTS ON THE PROPOSALS

As alluded to above, the primary focus of our comments relates to the graduated vehicle licensing process as it applies to commercial driver trainees. That is, the progression from driver licensing Class 2 to Class 5, which is outlined in Proposal 2. We have not commented on the medical related or sight testing provisions. However,

where appropriate we will comment on other aspects of the proposals covered in the draft amendment.

The main aspects of our comments are:

- A two-tiered approach for the New Zealand Graduated Driver Licensing System (GDLS) Class 2 to Class 5 vehicle licences
- Recalibrating the vehicle weight limits for Class 2 licences to enable removal of Class 4 from the GDLS (Revised proposal 2)
- Removal of the accelerated licensing process (Proposal 3)
- Retention of special type vehicle endorsements beyond the renewal phase of the Licence (Proposal 4)
- NZTA's role to set licence training standards and competency expectations, appointment of licence assessors and approved licence training providers as well as regulator audit and oversight. (Proposal 9)

We have made no attempt to comment on the text of the draft amendment rule. Instead, we have focussed on the Proposals outlined in the Overview and commented on these accordingly.

PROPOSAL 2: Simplify the progression from Class 2 to Class 5

Despite the positive and progressive changes to the progression process between Class 2 and Class 5 outlined in the rule draft, RTF's view is that significant benefits would be realised with a more dramatic approach to the progression process. We are still committed to a three-tier approach consisting of Class 1, followed by Class 2, leading finally to Class 5, a proposition that RTF presented in response to the 2016 DL Review discussion document.

The following commentary outlines the reasons the transport industry's support for the two-level commercial vehicle licensing approach has not diminished, and to make this scenario work in practice an essential component is the recalibration of the Class 2 vehicle weight threshold limits.

We offer no comment on the drivers 25 years and older proposals and arguably any amendments to the draft rule that arise from the submission process for the under 25 years group would automatically apply to the older group.

Before presenting the RTF vision for progression between Class 2 and Class 5 we offer comment on the Class 1 motor vehicle categories.

Class 1 Vehicle Categories, A Fresh Approach

There is an issue with Class 1 vehicle weights that is still evident in the draft within Schedule 3, perpetuating the ongoing inconsistencies between road vehicles and agricultural vehicles. The approach outlined in Schedule 3 for Class 1 level presents an impossible to manage and enforce array of vehicle types and their respective weights. We submit that each licence class should have a simple mass or weight threshold consistency.

In our view, there is a conflict in terms of safety principles (within Class 1) that constrains vehicle mass for standard vehicles to 4,500kg and standard combinations to the same 4,500kg combined weight and then allows for vehicles of GVM 6,000kg

to be driven on the same class of licence as long as they don't exceed 4,500kg on road weight. This sounds fine in theory but in reality, it is a nonsense and for all practical purpose unenforceable. If the draft is based on the new safety mantra of the Government Policy Statement (GPS), where is the consistency that allows holders of the same licence level to drive agricultural vehicles, including trailers, up to a gross combined weight of 25,000kg, although at restricted speed? There are also various applications of weight above the 4,500kg threshold for special type endorsement holders and non-special type endorsement holders operating tractor and trailer combinations also at restricted speeds. This muddled approach seems to be the result of multiple policy tinkering within the Class 1 licence vehicle weight thresholds to meet the aspirations of various end users. The result is the lack of a rational framework.

The first step should be to recast Schedule 3 as it applies to Class 1 vehicles. For simplicity, the threshold for class 1L, 1R and 1F should be any vehicle type or combination of not more than 6,000kg on road weight or GVM, whichever is applicable.

If the policy intent is to provide the agricultural, contracting and construction community with licensing relief at Class 1 level, then simply provide for Class 1L to increase the vehicle weight to 6,000kg, and for Class 1R and Class 1F tractor combinations and special type vehicles, a simple maximum threshold of 25,000kg when operated at not more than 40km. All other vehicle types would be limited to the 6,000kg on road weight threshold. This simplified approach also supports the removal of the special type licenses and encourages attention being placed on the occupational qualification. However, from an RTF policy perspective we might have to accept that the special type licences will be redundant by a legislative shift to the person conducting a business or undertaking (PCBU) responsibility, but we don't support them being removed from the licences of existing holders, a point we will come to later in this submission.

Progression from Class 2 to Class 5

The RTF does not support the retention of the Class 4 licence category in Proposal 2. Our view is it is entirely redundant and serves little purpose in preparing drivers for Class 5 vehicle operation. This is somewhat evident, especially considering a Class 2 vehicle of 12,000kg gross combination weight can tow a heavy trailer, but a Class 4 combination vehicle of more than 18,000kg gross laden weight is limited to towing a light trailer. This appears to be an administrative oversight.

Definitions: gross weight versus on road weight and gross laden weight versus gross mass

The definition gross laden weight was repealed (August 2017) so technically there are only two definitions in the Transport Act, i.e., *gross weight* which is effectively the on road weight of a vehicle, or combination of vehicles, and the *gross mass* which is the manufacturers' safe operating mass. When the draft rule, or our submission, speaks about the on road mass, we assume the term gross weight will apply. The

present rule retains the old definition of gross laden weight and the draft uses this phrase throughout Schedule 3. In that context we think the writer means the gross mass or gross combination mass of the vehicle descriptors set out in the text. We suggest some simplification and a standard approach to the terms used needs to be adopted, at least for clarity.

Why the Class 4 licence level is redundant

While we appreciate the Class 4 vehicle and corresponding licence may have appeal to some in the bus operator community, it is pretty much irrelevant to the commercial trucking sector. The capital and operating costs of the 18,000kg multi axle heavy vehicles are such that they are seldom likely to be operated without a heavy trailer. Secondly, providing mentored driving assistance for the practical pathway test option is simply not economically viable. In fact, we think only a very small section of the goods transport community would operate one of these as a solo vehicle. The obvious exceptions we know of are the rubbish compactor trucks and concrete agitator vehicles, both of which are unique applications. Sometimes urban freight distribution is carried out using Class 4 vehicles that embody a fitted tail lift, but these vehicles are more likely to be 2 axle and sometimes 3 axle vehicles operated at a gross laden weight (Gross Weight) of not more than 18,000kg. Given the relatively low numbers of these vehicles in the fleet, we don't see the Class 4 licence as being a viable proposition, even with the removal of the learner level. The simple option would be to expand the scope of the weight range and combination vehicles able to be used for training and to be driven within the Class 2 learner and Class 2 licensing phase.

The RTF two level approach

In RTF's view, there should be only two levels, Class 2 and Class 5 and the weight thresholds for vehicles under Class 2 should be amended to facilitate experience at the Class 2 licence level.

The vehicle weight thresholds should be set at 25,000kg on road weight for combination vehicles and unlimited mass for any single unit vehicles. The single unit vehicles should be permitted to tow a light trailer. It is this approach that makes the Class 4 vehicle redundant within the GDLS.

Class 5 would apply to any combination beyond the 25,000kg on road weight threshold. It is focused entirely on operating single trailered and multi trailered fully laden combinations. To enter class 2L the trainee would need to have six months' experience at Class 1, as set out in the draft. The general vehicle safety and traffic skills would be obtained at the Class 1 level and the revised 6 tonne threshold provides for more scope for a broader vehicle driving experience for those interested in pursuing a career driving heavy vehicles. However, we are not submitting on how to improve the Class 1 licence system, other than raising the mass threshold as we have suggested. We do submit that the Class 2 to 5 GDLS be recalibrated to better fit the needs of the industry.

The RIS and Cabinet paper both allude to the RTF model that was subject to an independent risk assessment by Castalia Strategic Advisers, with both the

aforementioned papers citing both risk and cost as reasons not to support RTF's two-tiered model. RTF never received a formal analysis of the risks (although we had a briefing) and the cost impacts. In our view, the latter were evident because our model required further development with the regulator's input. We sense the risk argument was predicated on the proposition that 18-year olds in a peer influenced environment uniformly exhibit a poorly developed sense of responsibility. While there may be considerable anecdotal evidence and the evidence of consequences to support that view, the contrary view is that youth in an employment environment don't exhibit such behaviours as they tend to be committed to their employment tasks. This is typically the situation found in the New Zealand trucking industry.

This has been a factor now recognised by the US authorities where they have set down a revised entry level commercial driver licensing approach for February 2020 which will enable 18-year olds to operate heavy trucks (NZ Class 5).

Simultaneously the DRIVE-Safe Act provisions will enable 18-year olds, after a supplementary period of specified training to 10 prescribed safety performance indicators, to be able to drive on interstate operations that were previously limited to 21-year-old drivers.

Formally named the Developing Responsible Individuals for a Vibrant Economy Act, DRIVE-Safe enhances safety and training standards for newly qualified and current drivers. Under the legislation, once a driver qualifies for a commercial driver's license, they begin a two-step additional training programme with rigorous performance benchmarks. Drivers must complete at least 400 hours of on-duty time and 240 hours of driving time in the cab with an experienced driver. Every driver will train on trucks equipped with new safety technology including active braking collision mitigation systems, video event capture, and a speed governor of 65 miles per hour or below.

If a country as litigious and as risk averse as the USA can see the merit of providing training and competency goals for 18-year olds to drive large trucks and truck combinations, then we have to question why New Zealand authorities seem intent on preserving a protracted approach to Class 5 licences for drivers, when we have a significant driver shortage, just as USA does. A key feature of the US Entry-Level Driver Training (ELDT) model is that it provides a realistic opportunity for attracting youth into a career in commercial truck driving.

A short summary of US ELDT Rule provisions is set out below:

*On December 6, 2016, FMCSA published a **final rule** to require drivers seeking a commercial driver's license to receive formal training before taking the CDL skills test.*

The final rule requires that all drivers seeking a CDL take a comprehensive training course designed to improve safety and awareness. The training will consist of both "theory" (e.g. traditional classroom instruction) and behind-the-wheel training, split between time spent on the "range" and on the road. There is no minimum number of hours prescribed in the rule, only that a driver must demonstrate proficiency in both the theory and behind-the-wheel portions of the training before advancing.

The rule also establishes a National Training Provider Registry. Truck driving schools and other training providers will self-certify that their programs comply with the minimum standards and provide documentation of such. Drivers seeking a CDL must choose a truck driver school from the registry. Also, training providers will be required to submit notification electronically to FMCSA that a driver trainee has completed the required training. FMCSA will provide that information to state driver licensing agencies through its Commercial Driver's License Information System.

FMCSA states that it does not expect any delays with the ELDT rule being fully implemented by February 7, 2020 deadline. For a complete summary, [click here](#). For a brief Frequently Asked Questions guide, [click here](#).

In a New Zealand context, Class 2 vehicles accessible at 18 years of age through both Class 2L and Class 2F, would provide access to a wider range of vehicles under the RTF model, instead of being limited to essentially two axle vehicles, as proposed by the draft model. This means the experience gained at Class 2 would be much wider and provide a more accomplished set of skills before the graduation to Class 5F through an independent competency test.

Our approach improves the opportunity for new heavy vehicle trainees to access the type of vehicles required for initial training purposes, but also covers more typically the vehicles used in road freight transportation today. Although the heavy vehicle fleet is dominated by two axle vehicles that are likely to fit within the present the current Class 2 weight limits, these are predominantly used in the urban delivery environment by enterprises allied to other businesses or by utility companies, small civil contractors, or farmers as a farm vehicle. For most transport operators within the Forum membership, there simply isn't the business capacity to have standard size two axle vehicles available to train drivers in-house. At the level member companies operate, those that attempted this approach simply found it uneconomic to invest in two axle vehicles solely to meet the training and driver experience constraints imposed by the current Class 2 licence level.

The changes RTF has put forward also provide for the new generation of heavier buses and for mechanics and support staff to be able to move unladen heavy combinations around for maintenance, servicing and Certificate of Fitness (COF) inspections. It is our view that this is a major cost saving in that servicing staff don't have to progress to a Class 5 licence to carry out their occupational tasks. It also provides a lot more versatility for deploying and utilising maintenance and support staff within transport companies.

The main benefit of the RTF Class 2 option is it assists in making the transition and adaptation of skills to Class 5 combinations easier to achieve, because of the wider experience gained at the Class 2 level. With the complementary oversight of the Health and Safety at Work Act, PCBU responsibilities and penalties for poor safety management that were only getting bedded down at the time of the 2016 DL discussion document, suggest that poor corporate decision making or risky behaviours would be less likely to occur. This situation should add even more confidence to the recalibrating of the Class 2 vehicle framework.

It would also follow that the Class 2 theory and practical skill test needs to be significantly enhanced to ensure the best outcomes, and that proficiency skills and safety knowledge are adequately taken up by drivers at this stage of the GDLS. An independent competency test should be able to highlight any weaknesses in driving performance, judgement, decision-making and overall skill and competency.

We need to stress that even with an independent testing process, the licencing system is not capable of making the driver applicant a truck driver or bus driver. It is only able to provide some level of assurance that the individual is capable of adequately managing the vehicle on the network without undue risk to other road users, including other vehicle users.

Under the RTF model, drivers contemplating moving on to Class 5, the heavy multi trailer combinations (over 25,000kg road weight), would achieve significant preparatory skills at Class 2F. These drivers would typically be 18 years (absolute minimum) or older at this stage of their occupational development and from a policy perspective, a minimum time period at Class 2F of six months might be justified. The wider range of vehicle weights and designs under the RTF model able to be accessed at Class 2F, significantly improves the opportunity for employment for trainees before they move onto Class 5. It is this more versatile approach to licensing that would be of benefit to both new drivers and employers, a point we have already commented on. We suggest Class 5 retain an entry theory test for Class 5L, and a Class 5F licence be obtainable by an independently conducted formal skill and competency test. The minimum age threshold at this point could be 18-and-a-half years old, but is more likely to be higher.

PROPOSAL 3: Removal of the Accelerated Licensing (ALP) process

The lack of support from the Overview text makes it self-evident the ALP has run its course. It was great idea that just didn't get traction with the sector, yet those who were able to use it spoke highly of the benefits. Interestingly the two pathways, the practical test pathway and the approved course pathway through the GDLS, enables those still interested in self training, or in mentored training, the option to select the practical test pathway alternative. This latter approach would be expected to mirror aspects of the ALP without having the administrative burden of the original ALP design.

PROPOSAL 4: Removal of special type endorsements F, W, T, and R.

There is no doubt that keeping them into today's health and safety environment of the Health and Safety at Work Act could be viewed as a regulatory duplication and consequently, RTF would accept that no further new endorsements should be issued after this rule amendment comes into force.

However, for current holders, these endorsements tend to have an implicit connection with their occupational skills or work history, even though they don't confer any evidence of the skills required to operate the specific vehicle types in any occupational application.

The approach suggested by this proposal isn't as clean as the draft suggests and could have some down sides for the road transport sector. Access to occupational skill training and the corresponding qualifications is somewhat limited and very costly. There is no

evidence that employers will seek to purchase formal training and will realistically deliver the WTR skills with on-the-job training. The truck driver population is quite transient and the WTR endorsements on the licence are the only evidence individuals have for validating they have had at least some knowledge of the special type vehicles, albeit limited.

From the RTF members' perspective, employees tend to have the F, W, T, R endorsements and these are seen as a form of qualification, so removing them would be seen as disenfranchising this group. In many cases we suspect these special type endorsements are part of the only formal qualification denoting their experience, past or current, that many commercial truck drivers have.

In an example of how the endorsements work in practice, an individual or employee goes to a hire facility to hire a small excavator for the employer. The hirer is almost certainly going to ask for evidence that the person has some knowledge about this special type vehicle before committing to hire the item. With the explosive growth in the availability of contracting and civil construction equipment, the endorsements take on a new importance.

No-one is going to turn up to a hirer or leasing agent with a health and safety certificate, or training provider certificate, and implying that the leaser or hirer will seek such information simply isn't going to happen.

As much as we understand there is the view held by the Agency that the F, W, T, and R endorsements have been overtaken by the health and safety legislative framework there appears, in our view, an equally strong argument to retain them, at least for the natural life of all current endorsement holders.

For current endorsement holders we would support their endorsements being retained because they qualified for them. However, this wouldn't remove any legal obligation for employers to provide the necessary occupational training.

On the other hand, if RTF accepts here is no need for NZTA to have any future role in these licence endorsements, then there could be a voluntary option (but not a requirement) to have them added to a driver's licence on the basis of suitable evidence being provided to the Agency. This could be carried out at cost recovery.

PROPOSAL 5: Standardise speed thresholds for tractors and special type vehicles.

Standardising the speed has some merit from an enforcement and administrative perspective. However, this aspect of specialist vehicle management must be accompanied by appropriate compliance of primary safety equipment such as towing connections (where they are being used), brake capability and performance, and lighting and conspicuity.

PROPOSAL 6: Simplify Rules for tractors that can be driven on class 1 licence

Schedule 3 providing for tractors and other agricultural vehicles operation on Class 1 licences is already overly generous in providing benefits and opportunity to the farming

community. With the new liberal standard vehicle speed of 40km proposed in Proposal 5, some of the mass ranges could be pared back. An example is the combination vehicle of 25,000kg (tractor and trailer). How can it be justified that a youth farm worker can operate a very complex combination vehicle, or piece of farm machinery, of 25,000kg (on road weight) with little or no experience, from licence Class 1R, but a youth trainee truck driver with Class 2 can't operate a vehicle being a unladen truck and trailer combination that presents similar dynamic characteristics? We appreciate there is the speed difference, but the truck combination is subject to a more formal and rigorous compliance assessment. Therefore, the safety coefficient or potential public risk profile of the two alternate combinations should be relatively similar. Arguably the truck trailer is actually safer.

PROPOSAL 7: Consolidation of Schedule 3

Schedule 3 is untidy and justifies recalibrating the various weight thresholds and vehicle types to bring the GDLS into some sort of logical system of progression through the various vehicle types and ranges. The adoption of the RTF proposal for two heavy vehicle licence classes and accompanying vehicle types, and their respective weight bands, would make the whole framework administratively simple and appear more seamless than the Drafts proposed model. We have already raised questions about the Schedule 3 framework in our comments at the beginning of our submission on this draft.

PROPOSAL 9: Improved oversight of course providers

Continuing to use the terms "practical test pathway" or "approved course pathway" doesn't afford a clear impression of the industry's expectation for the Agency to have better oversight of the qualification tests. In fact, the Overview is entirely silent on this aspect, which suggests the two present driver skill input systems will continue to operate without any specific need for a final competency assessment before F licence qualification.

We agree and support the proposals to improve the oversight of the training providers. The fundamental problem of enabling the commercial trainers to assess candidates they have trained for licence approval will simply exacerbate the present problem of too little responsibility for driver licensee quality. This, coupled with a misplaced expectation among some industry quarters that the licencing system is designed to deliver truck drivers, doesn't help deliver the best outcomes.

However, this view tends to miss the point that occupational experience and skill can only be delivered by the employer, or through the occupational skill courses and training options available through an organisation such as MITO. The reality is the licensing system can only deliver drivers capable of safely controlling and managing vehicles on the network to which their licence applies.

Given the obvious limitations of the driver licencing system, it follows that either route to a licence, the practical test pathway or the approved course pathway, requires an output

test that can evaluate both the theory and competencies to ensure the best outcomes and that skills and safety knowledge are adequately taken up by drivers at each stage. An independent competency test should be able to highlight any weaknesses in driving performance, judgement, decision-making and overall skill and competency. We would expect NZTA to have primary oversight of the licensing system, particularly for Class 2 and Class 5.

The Land Transport Act 1998 outlined in the following clause reference suggests an implicit responsibility regarding licencing and the setting of training standards that fall within the ambit of the Agency. The requirement to provide training and supervision is in clause 5(b). It could be argued this clause gives effect to other parts of the Act and Rules but it could also mean, for example, that an employer has to provide training to a driver making sure the vehicle is safe to operate, with a completed pre-trip inspection and appropriately rated components etc.

4 General requirements for participants in land transport system

(5) A participant who holds a land transport document that authorises the provision of a service within the land transport system—

(b) must provide training and supervision to all employees of the participant who are engaged in doing anything to which the document relates, so as to maintain compliance with the relevant prescribed safety standards and the conditions attached to the document and to promote safety; and

(c) must provide sufficient resources to ensure compliance with the relevant prescribed safety standards and the conditions attached to the document.

The suspension and revocation capabilities highlighted in the overview text to proposal 9, while helping the management of the approved course providers, don't actually go anywhere to help the proficiency and competency outcomes of the new drivers. They are simply management tools.

RTF's submission hangs on the point that an independent competency assessment for driving licence F category, at whatever licence class level, is an essential component of the system that industry can have confidence in.

One final point is that the overview discussion alludes to the fact that few used the ALP and we suspect that the practical test pathway for many is not a viable option, so most will continue with an approved course approach. We note that this amendment offers no time concession off the time bars in the model presented, which contrasts with present Driver Licencing model where investment in professional training results in a reduced time bar. We believe that this is an approach that should be continued.

Concluding comments

Our preference is a modification of Proposal 2 as discussed above. The draft offers some benefits but, in our view, simply doesn't go far enough toward simplifying the heavy vehicle licencing regime. Instead of condemning the approach taken, we would suggest

it is more of an evolutionary approach when the sector needs revolutionary one. If the draft goes forward as is, RTF can only see it as an opportunity lost.