



SUBMISSION

Heavy Vehicle Driver Safety Reform Victorian Regulatory Impact Statement

Submission to the Victorian Department of Transport and
Planning

Australian Logistics Council

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Table of recommendations

No.	ALC recommendation
1	Use the nationally agreed NHVDCF as the foundation of Victoria's reforms. Avoid permanent Victorian-only requirements.
2	Make demonstrated competency and verified driving experience central to licence progression, rather than relying mainly on time served.
3	Retain alternative HC and MC progression pathways based on verified driving hours and structured supervision.
4	Use minimum training times to protect training quality, not as a substitute for assessing competence.
5	Apply stronger recent-driving-history eligibility rules where they target a genuine safety risk. The rules should be proportionate, nationally consistent and open to appropriate review.
6	Require MC applicants to build appropriate HC experience where the national framework supports it, while allowing capable drivers to use alternative progression pathways.
7	Strengthen training-provider and assessor governance without shutting out high-quality employer-based and enterprise RTO models.
8	Develop a nationally compatible digital way to verify training, driving experience and licence progression.
9	Where driver or coach eligibility must be checked, provide a simple, no-cost and privacy-conscious verification process. Do not require employers or RTOs to obtain and interpret more driver-history information than necessary.
10	Assess the full workforce and cost impacts before implementation, including trainer, assessor and coach availability, regional access, and costs borne by applicants, training providers and employers.
11	Provide clear transitional arrangements and reasonable grace periods for existing licence holders, current trainees, interstate drivers, employers and training providers.
12	Phase implementation so Victoria can help test and improve the national model without creating long-term regulatory divergence.
13	Review the reforms after implementation using measurable safety, workforce, cost and mobility outcomes.

1. About the Australian Logistics Council

The Australian Logistics Council (ALC) is the national peak body representing Australia's supply chain logistics and freight transport industry.

Our members work across the end-to-end supply chain, including road transport, freight rail, ports, airports, intermodal terminals, warehousing and distribution, retail, manufacturing, technology and major freight customers.

ALC works with governments, regulators and industry to improve the safety, productivity, efficiency and resilience of Australia's supply chains.

Heavy vehicle driver licensing matters because employers and the community need confidence that a driver can safely operate an increasingly complex vehicle. The system also needs to support a mobile national workforce and give capable drivers a practical way to progress as they build skills and experience.

ALC has consistently supported a nationally consistent, competency-based approach to heavy vehicle driver licensing.¹

2. Executive summary

ALC supports the objectives of Victoria's Heavy Vehicle Driver Safety Reform.

There is a clear case for change. Holding a lower-class licence for a set period does not mean a driver has gained useful experience. A short training course does not, by itself, show that someone is ready to safely operate a more complex heavy vehicle.

The national reform addresses some of those weaknesses. Stronger competencies, credible minimum training requirements, better oversight of training providers and alternative progression pathways should improve safety and produce more capable drivers.

ALC also accepts that recent serious driving behaviour matters when deciding whether someone should enter or progress through the heavy vehicle licensing system.

The issue for ALC is not whether standards should rise. They should.

The issue is whether Victoria raises them by creating another set of state-specific requirements in what should increasingly be a national licensing system.

Freight does not stop at the Victorian border. Drivers and fleets move between Victoria, New South Wales, South Australia and other jurisdictions every day. Different eligibility rules, training standards and progression requirements make it harder to move drivers between operations and add cost for national businesses.

Victoria should use the nationally agreed National Heavy Vehicle Driver Competency Framework (NHVDCF) as the basis of its reforms. If it wants to go further, it should show what additional safety problem it is addressing, why the national setting is not enough and how any stronger measure could be considered nationally.

¹Australian Logistics Council, National Competition Policy Analysis 2025, 6 June 2025, pp. 1-2, <https://austlogistics.com.au/wp-content/uploads/2025/06/250606-Submission.pdf>.

ALC strongly supports competency- and experience-based progression.

The national Decision RIS recognises the weakness in relying on licence tenure alone. It proposes pathways based on verified driving experience or structured supervision alongside the existing tenure pathway. Under the national model, a driver could progress from MR or HR to HC by demonstrating 600 hours of driving experience over at least 26 weeks, or through an approved supervision pathway. HC to MC progression could also occur through verified experience or supervision.²

That is a better basis for progression. It should reflect what a driver can safely do and the experience they have actually gained, not simply how long they have held a licence.

Workforce impacts matter as well. The Victorian Government expects freight volumes to increase by 75 per cent by 2040 and forecasts that more than 21,000 additional heavy vehicle drivers will be needed by 2034.³

If a new requirement makes entry or progression more complex, it needs to deliver a real safety benefit.

Implementation matters just as much as the policy design. The reform should not reduce training capacity, shift avoidable administration to employers and RTOs, or add costs that do not improve safety. These issues need to be settled before commencement, not left for industry to work out later.

3. Recommendations

The recommendations on page 3 follow one principle: lift the standard, but do it in a way that works nationally and recognises real competence and experience.

4. National consistency should be the starting point

The legal position is straightforward.

The Heavy Vehicle National Law (HVNL) applies in Victoria through the Heavy Vehicle National Law Application Act 2013. Driver licensing, including training, testing and endorsements, remains the responsibility of state and territory road authorities.⁴

So Victoria can set its own heavy vehicle driver licensing requirements.

The real policy question is whether a different Victorian requirement improves safety enough to justify another jurisdictional difference.

²Austroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, proposed experience and supervision pathways, pp. 51-53, https://austroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDcf_Ddecision_RIS.pdf.

³Victorian Department of Transport and Planning, Heavy Vehicle Driver Safety Reform - Stakeholder Information Pack, 2026, Frequently Asked Questions, p. 9. The material identifies forecast freight growth of 75 per cent by 2040 and a need for more than 21,000 additional drivers by 2034.

⁴Heavy Vehicle National Law Application Act 2013 (Vic), s 4, <https://www.legislation.vic.gov.au/in-force/acts/heavy-vehicle-national-law-application-act-2013/026>; National Heavy Vehicle Regulator, Licensing, noting that heavy vehicle licensing, training, testing and endorsements remain state and territory responsibilities.

Australia has spent years trying to reduce fragmentation in heavy vehicle regulation. ALC has consistently argued that different licensing standards and progression rules reduce labour mobility, add compliance costs and make workforce planning harder for national operators.⁵

The Victorian Freight Plan also commits DTP to heavy vehicle driver reform based on the NHVDCF review, aiming to deliver a robust and consistent training, curriculum and testing system.⁶

The same principle fits Victoria's broader economic policy. The Economic Growth Statement commits the Government to cutting red tape and building skills, while national competition reforms are moving towards a Single National Market that makes it easier for skilled workers and businesses to operate across state borders.⁷

That should be the starting point for this reform.

If Victoria has evidence that an additional measure will materially improve safety, it should test it and take the results back through Austroads and the other jurisdictions. A stronger national standard is a better outcome than a permanent Victorian exception.

A practical test for Victorian departures

For ALC, any departure from the national framework should answer four practical questions: what safety problem is Victoria trying to solve; what evidence shows the national setting is not enough; will the extra requirement materially improve safety; and do the benefits justify the effect on workforce mobility, cost and regulatory complexity?

If those questions cannot be answered, ALC would support the nationally agreed setting.

5. Move from time served to demonstrated competence

ALC supports changing the way drivers progress through the higher licence classes.

The current system often uses tenure as a stand-in for experience. They are not the same thing.

A person can hold a licence for 12 months and do very little relevant driving. Another driver may spend the same period working regularly, receiving structured coaching and building substantial experience.

The national Decision RIS identifies the same weakness. Current tenure arrangements do not guarantee meaningful behind-the-wheel experience or competence before a driver progresses to a more complex vehicle.⁹

The alternative pathways better reflect how drivers actually build competence.

⁵Australian Logistics Council, National Competition Policy Analysis 2025, 6 June 2025, <https://austlogistics.com.au/wp-content/uploads/2025/06/250606-Submission.pdf>; Australian Logistics Council, Productivity Commission Interim Report: National Competition Policy Analysis 2025, September 2025, <https://austlogistics.com.au/wp-content/uploads/2025/09/250905-Submission.pdf>.

⁶Victorian Government, Victoria Delivers: Victorian Freight Plan 2025-30, Action 26.1, <https://www.vic.gov.au/sites/default/files/2025-09/The-Victorian-Freight-Plan-2025-29-Victoria-Delivers.pdf>.

⁷Victorian Government, Victoria's Economic Growth Statement, updated 17 April 2026, <https://www.vic.gov.au/victorias-economic-growth-statement>.

⁸Australian Government, 2026-27 Budget Speech, 12 May 2026, noting National Competition Policy reforms to build a Single National Market, <https://ministers.treasury.gov.au/ministers/jim-chalmers-2022/speeches/2026-27-budget-speech-parliament-house-canberra>.

⁹Austroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, discussion of licence tenure and experience, https://austroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDCF_Decision_RIS.pdf.

For MR or HR to HC progression, the national model provides either a structured supervision pathway or an experience pathway based on 600 verified driving hours over at least 26 weeks.

For HC to MC, the experience pathway requires 700 verified driving hours over at least 26 weeks. A structured supervision pathway is also available.¹⁰

ALC supports both pathways.

They give drivers who are genuinely building experience a way to progress without simply waiting for a date to pass, while still requiring them to prove that experience.

The national Decision RIS estimates that these pathways can substantially reduce the time needed to reach higher licence classes without removing the experience requirement. It also concludes that alternative progression is unlikely to reduce road safety and may improve the availability of drivers at higher licence classes.¹¹

That matters at HC and MC level, where driver shortages can limit operators' ability to use higher-productivity vehicles.

This is not about making licensing easier. It is about making progression mean something.

If a driver has the required experience and can demonstrate the required competence, the system should let them progress.

6. MC progression should include genuine combination-vehicle experience

There is a sound safety case for requiring MC applicants to build experience at HC level first.

The national Decision RIS explains that the intention is for drivers to build capability in a less complex combination vehicle before moving into MC operations.¹²

ALC agrees with that principle.

But the HC stage needs to involve real experience. Adding another licence class achieves little if it becomes an administrative step rather than genuine skills development.

That is why the HC requirement should sit alongside the alternative progression pathways.

A driver with substantial verified HC experience who can demonstrate competence should be able to progress without unnecessary delay.

That strikes a better balance. Drivers should not move into MC work without relevant experience, but capable drivers should not be held back simply because 12 months have not passed.

¹⁰Austroroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, Table 11, https://austroroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDCF_Decision_RIS.pdf.

¹¹Austroroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, pp. 75-76, https://austroroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDCF_Decision_RIS.pdf.

¹²Austroroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, proposed HR, HC and MC progression arrangements, https://austroroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDCF_Decision_RIS.pdf.

7. Minimum training time is useful, but time is not competence

ALC supports credible minimum training periods.

The national Decision RIS identifies very short training courses as a weakness in the current market and proposes minimum training periods, including behind-the-wheel components, to improve quality.¹³

ALC agrees with that direction.

Complex heavy vehicles cannot be taught properly in an implausibly short course.

But minimum training time is still only a minimum.

Completing the required hours should not automatically mean a pass. If a driver has not demonstrated the required competence, they need more training before a licence is issued.

The reverse matters too. Experienced people should not have to repeat training they can already show they have completed or mastered.

Recognition of prior learning and recognition of current competency should remain available where they can be applied safely and consistently.

That matters when workers change employers, move between jurisdictions or enter road freight with related transport experience.

8. Eligibility based on driving history

ALC accepts that recent serious driving behaviour is relevant to future heavy vehicle crash risk.

The national Decision RIS found that drivers with recent licence bans, suspensions or disqualifications had a higher heavy vehicle crash risk. Its modelling found that a two-year exclusion from obtaining or upgrading a heavy vehicle licence could deliver meaningful road-safety benefits.¹⁴

That evidence should be acted on.

ALC therefore supports a stronger eligibility requirement in principle.

But the rule needs careful targeting.

Not every suspension or disqualification carries the same risk. Serious unsafe driving behaviour should not be treated the same as lower-level or administrative matters unless the evidence supports it.

The framework should focus on conduct that is clearly relevant to future heavy vehicle safety. It should also provide a straightforward process for checking interstate history, correcting inaccurate information and reviewing exceptional cases.

National consistency matters here too.

A Victorian restriction will have limited effect if an applicant can obtain or upgrade a licence elsewhere and later operate in Victoria.

¹³Austroroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, discussion of minimum training times, https://austroroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDcf_Decision_RIS.pdf.

¹⁴Austroroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, analysis of licence suspension and disqualification history, pp. 82-84, https://austroroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDcf_Decision_RIS.pdf.

The national Decision RIS identifies interstate information exchange as an implementation issue.¹⁵

Victoria should work through Austroads and the other licensing authorities on a common national approach.

There is also a practical question about who carries out the eligibility check. ALC members have raised concern that employers or RTOs could end up administering a government eligibility rule, including obtaining and interpreting driver-history information. That would shift cost, administration and privacy risk onto industry.¹⁶

A full Victorian driver history currently costs \$22.50 and contains more information than may be needed for a simple eligibility decision. DTP should provide a no-cost, privacy-conscious verification process that confirms whether a person is eligible for the relevant licence or coaching pathway without requiring employers or RTOs to collect and store more personal information than necessary.¹⁷

9. Training-provider governance

ALC supports stronger oversight of heavy vehicle training and assessment providers.

A competency-based system only works if employers, regulators and drivers can trust the assessment.

Providers should be able to show that trainers are properly qualified, assessments are credible, records are accurate, suitable vehicles are used and conflicts are managed. Regulators also need a practical way to deal with poor-performing providers.

Stronger oversight should not push high-quality enterprise training out of the system.

Some large operators already invest well beyond the minimum required for a licence.

ALC member Linfox, for example, operates an approved Registered Training Organisation and licence provider. Its operational training business delivers accredited and non-accredited training to more than 7,000 employees and external learners each year, including heavy vehicle licensing in Victoria.¹⁸

That matters because enterprise training can add real workplace experience to formal licensing.

An enterprise RTO can combine accredited training with real operating environments, experienced drivers, company safety systems and workplace-based development.

The regulator should judge providers on the quality of their training and assessment, not on whether they are an enterprise RTO or an independent provider.

The reform also needs enough people to deliver it. If new qualification, assessment or coaching requirements reduce the pool of eligible trainers and assessors, waiting times and costs will rise

¹⁵Austroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, implementation requirements for driving-history information exchange, https://austroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDcf_Decision_RIS.pdf.

¹⁶ALC member consultation, October 2026.

¹⁷Transport Victoria, Driver licence history and work diary fees, current full driver history fee \$22.50, <https://transport.vic.gov.au/road-and-active-transport/registration-and-licensing/licences/driver-history-handbooks-and-logbooks/driver-licence-history-and-work-diary-fees>.

¹⁸Linfox, About Linfox Operational Training, accessed October 2026, <https://www.linfox.com/operational-training/about-linfox-operational-training/>. Linfox states that more than 7,000 team members and external learners undertake its training each year and that it is an approved RTO and licence provider, including for heavy vehicle licensing in Victoria.

before any safety benefit is realised. DTP should model how many current trainers, assessors and coaches would remain eligible, where gaps are likely to occur and how long providers would need to meet any new requirements.

10. Licensing should complement industry safety systems

A heavy vehicle licence can only do so much.

It should show that a driver has demonstrated the minimum competence needed to safely operate the relevant class of vehicle.

It cannot replace the training and supervision needed for the actual freight task.

A newly licensed driver may still need training for a particular vehicle combination, route, load, customer environment, fatigue system or operating task.

The HVNL already places broader safety duties across the Chain of Responsibility. Those duties apply to parties that control or influence the transport task.¹⁹

That is also how industry manages risk in practice.

NTI's public Driver Acceptance Guide, for example, considers driver experience, vehicle configuration, freight type, operating radius and driving history. It also recognises operators with stronger systems for managing less experienced or higher-risk drivers.²⁰

Those systems do not replace good licensing.

They do show why driver safety cannot be reduced to a licence class alone.

Licensing should set a credible entry standard. Employer safety and competency systems then build on it.

11. Workforce impacts cannot be an afterthought

Safety must remain the first objective of heavy vehicle licensing.

But workforce effects matter too.

Victoria's supply chain logistics and freight transport industry already struggles to attract and retain drivers, particularly at the higher licence classes.

DTP's consultation material states that Victorian freight volumes are expected to increase by 75 per cent by 2040 and that more than 21,000 new drivers may be needed by 2034.²¹

ALC has also repeatedly raised heavy vehicle driver shortages in national workforce policy and has called for competency-based licensing as part of the response.²²

¹⁹National Heavy Vehicle Regulator, Regulatory Advice - The Primary Duty, <https://www.nhvr.gov.au/safety-accreditation-compliance/chain-of-responsibility/regulatory-advice/the-primary-duty>.

²⁰National Transport Insurance, Driver Acceptance Guide, accessed October 2026, <https://www.nti.com.au/broker/tools-guides/driver-acceptance-guide>.

²¹Victorian Department of Transport and Planning, Heavy Vehicle Driver Safety Reform - Stakeholder Information Pack, 2026, Frequently Asked Questions, p. 9.

²²Australian Logistics Council, Building a Skilled and Adaptable Workforce, 6 June 2025, <https://austlogistics.com.au/wp-content/uploads/2025/06/250606-Building-a-skilled-and-adaptable-workforce.pdf>; Australian Logistics Council, Economic Reform Roundtable, 25 July 2025, <https://austlogistics.com.au/media-centre/submission-economic-reform-roundtable/>.

So every new licensing requirement should be tested against two questions: what safety benefit will it deliver, and what will it do to workforce entry or progression?

That is not an argument against requirements that cost money or take time. It is basic regulatory discipline.

DTP should test the effect on course costs, time away from work, employer supervision, small operators, training vehicle availability, trainers and assessors, regional waiting periods, HC and MC driver supply, and any incentive for applicants to obtain a licence interstate.

That assessment should follow the cost through the whole system. Higher RTO compliance, verification and administration costs may be passed to employers that use external providers or run large driver-development programs. DTP should identify who ultimately bears the cost, not just where the cost first appears.

The same applies to training capacity. The impact assessment should test whether the new rules change the supply of trainers, assessors and coaches, particularly in regional Victoria and for higher licence classes.

The consultation material already acknowledges that higher compliance costs for training providers could be passed on to applicants. A separate Fee RIS will consider the cost-recovery arrangements.²³

That work needs to be done before implementation.

Government should understand what the reform will cost the person trying to become a driver, not just what it will cost the regulator.

12. Regional Victoria needs separate attention

These reforms will not land the same way everywhere in Victoria.

A person in metropolitan Melbourne may have several approved training providers nearby. A regional applicant may need to travel, take more time away from work or wait for an assessor to become available.

For a regional applicant, those extra costs can add up.

That matters particularly if the alternative progression pathways depend on approved coaches, specific assessors or access to particular vehicle classes.

DTP should test regional readiness before the new requirements commence.

That assessment should cover provider availability, trainers and assessors, heavy vehicle coaches, suitable training vehicles, assessment waiting times and access to higher licence classes.

It should also test whether the proposed requirements themselves reduce regional training capacity. Current provider numbers should not simply be assumed to remain available after new trainer, assessor or coach standards take effect.

Where there is a clear gap, government should deal with it before asking regional applicants to comply with new requirements.

²³Victorian Department of Transport and Planning, Heavy Vehicle Driver Safety Reform - Stakeholder Information Pack, 2026, Frequently Asked Questions (continued), p. 10. The pack notes that a separate Fee Regulatory Impact Statement will determine cost-recovery arrangements and that additional training-provider costs may be passed on to applicants.

13. Verifying experience

If experience is going to count, the system needs a credible way to prove it.

That should not turn into another unnecessary administrative burden.

The national Decision RIS identifies in-vehicle telematics, work rosters and work diaries as possible sources for verifying driving hours.²⁴

ALC supports that flexibility.

A national operator with established telematics should be able to use those records.

A small operator should not have to buy a new technology platform if its existing records can prove the same thing.

Over time, Australia should move towards a nationally compatible digital record of verified training and driving experience.

ALC has previously called for a national digital platform to record verified training and driving hours as part of heavy vehicle licensing reform.²⁵

This reform is a chance to start moving towards that system.

It would make experience easier to verify, improve portability and reduce duplicate paperwork when drivers change employers or jurisdictions.

14. Transition needs to be practical

DTP has said existing heavy vehicle licence holders will not have to repeat training or assessment.²⁶ ALC supports that position.

People already in the system also need certainty.

That includes applicants who have started accredited training, people part-way through existing tenure requirements, drivers in employer development programs, applicants who have already paid for an assessment, and interstate licence holders working in Victoria.

Training providers will also need enough time to train staff, adjust programs, secure suitable vehicles and meet the new governance requirements.

Employers and RTOs may also need to change systems for eligibility checks, evidence and record keeping. Reasonable grace periods are appropriate where those administrative arrangements change. They should not, however, weaken a requirement aimed at an immediate and demonstrated safety risk.

Victoria should not rush commencement simply to be the first jurisdiction to implement the reform.

Being first is not the test. Making the system work is.

²⁴Austroads, Decision Regulatory Impact Statement - National Heavy Vehicle Driver Competency Framework, discussion of telematics, work rosters and work diaries as possible means of verifying driving experience, https://austroads.gov.au/__data/assets/pdf_file/0032/616964/NHVDcf_Decision_RIS.pdf.

²⁵Australian Logistics Council, National Competition Policy Analysis 2025, 6 June 2025, recommending a national digital platform to track verified training and driving hours, <https://austlogistics.com.au/wp-content/uploads/2025/06/250606-Submission.pdf>.

²⁶Victorian Department of Transport and Planning, Heavy Vehicle Driver Safety Reform - Stakeholder Information Pack, 2026, Frequently Asked Questions, p. 9. Existing heavy vehicle licence holders will not be required to repeat training or assessment.

15. Victoria can lead without creating a separate system

There is value in Victoria moving early.

The consultation material says early implementation would bring forward safety improvements, support national alignment and allow Victoria to help shape implementation before other jurisdictions adopt the framework.²⁷

ALC supports that approach.

But early implementation should be used to improve the national model.

If Victoria wants to trial extra measures, DTP should be clear about the problem each one is meant to solve, the evidence it will collect, how success will be judged and when the measure will be reviewed.

If a Victorian measure works, it should be taken back into the national process.

That is how Victoria can lead without creating another permanent jurisdictional difference.

16. Measure what changes after implementation

The reform should include a formal post-implementation review.

It should look at safety and workforce outcomes together.

A fall in licence applications does not necessarily mean roads are safer. A rise in licence numbers does not necessarily mean the new system is working.

DTP should focus on what happens to newly licensed drivers.

That includes fatal and serious injury involvement, outcomes under each progression pathway, provider compliance, training and assessment failure rates, licence costs, the time required to reach HC and MC, regional waiting periods, workforce availability, interstate licence movements and employer confidence in newly licensed drivers.

The review should happen early enough to fix problems before they become embedded.

17. Licensing is only part of driver development

The licensing system will not solve every workforce or safety issue.

A licence is the beginning of a professional driver's development, not the end.

Heavy vehicle drivers work within a much wider regulatory environment that includes fatigue management, Chain of Responsibility, load restraint, dangerous goods requirements and increasingly sophisticated vehicle and digital systems.

Victoria's consultation material acknowledges that broader pre- and post-licensing professional development sits outside this reform.²⁸

ALC accepts that boundary.

²⁷Victorian Department of Transport and Planning, Heavy Vehicle Driver Safety Reform - Stakeholder Information Pack, 2026, Frequently Asked Questions (continued), p. 10, on Victoria's proposed early implementation and national harmonisation.

²⁸Victorian Department of Transport and Planning, Heavy Vehicle Driver Safety Reform - Stakeholder Information Pack, 2026, Frequently Asked Questions (continued), p. 10, noting that broader professional driver development, including pre- and post-licensing training, sits outside the scope of this reform.

Even so, there is a case for further work between DTP, Austroads, the NHVR, industry and the training sector on professional driver development after licensing.

Drivers will need to keep building capability as vehicles, technology and freight operations change.

18. Conclusion

ALC supports reform of Victoria's heavy vehicle driver licensing system.

Better training, stronger assessment and more confidence in driver competence are all sensible objectives.

So is moving away from a system that treats time served as proof of experience.

The alternative progression pathways are one of the better parts of the reform. Done properly, they can lift standards while allowing capable drivers to move on as they build real experience.

Victoria should also strengthen training-provider oversight and respond to credible evidence about recent high-risk driving behaviour.

Good implementation matters too. The reform should not unnecessarily reduce training capacity, shift government eligibility administration onto employers and RTOs, or create avoidable costs without a clear safety return.

But the reform still needs to work within a national system.

Australia's road freight system crosses borders every day. National operators need confidence that a heavy vehicle licence represents a broadly consistent standard wherever it was issued.

Victoria should use the nationally agreed framework as the basis of its reforms.

If Victoria chooses to go further, the case should be clear, proportionate and supported by evidence. If a measure works, it should then be considered nationally.

The goal is not to make heavy vehicle licensing harder.

It is to make sure drivers are safer, capable and job-ready, while giving people who can demonstrate competence and experience a practical path into higher-skilled work.

ALC looks forward to continuing to work with the Victorian Government, Austroads, regulators and industry as the detailed arrangements are settled.