CEMENT CONCRETE & AGGREGATES AUSTRALIA

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Transport & Main Roads

Submitted via: nhvdcfproject@tmr.qld.gov.au

Draft National Heavy Vehicle Driver Competency Framework

Introduction

Cement Concrete & Aggregates Australia (CCAA) appreciates the opportunity to provide feedback on the draft National Heavy Vehicle Driver Competency Framework and associated Heavy Rigid (HR) licence training materials (Version 0.3.4). Our members recognise the importance of rigorous, competency-based training to ensure safety and professionalism across the heavy vehicle industry. We also acknowledge the work undertaken by the National Implementation Committee (NIC) and the NTC to harmonise and modernise driver training standards.

It is noted that the cement, concrete and aggregates industry accounts for approximately 13% of the national road freight tonne-kilometre task, underscoring the significant contribution our members make to Australia's freight and infrastructure supply chain.

General Position

CCAA supports the intent of a nationally consistent, competency-based HR training framework that lifts safety outcomes and professional standards. However, the CCAA considers that some elements of the current proposal require further refinement to ensure the framework is practical, efficient, and accessible to new drivers while still delivering genuine safety benefits.

- The proposed total hours (below) for combined training and assessment is excessive and risks deterring new entrants. While competency-based delivery is supported, total time should be rebalanced through modular or blended delivery models.

Class	Online	In classroom	In vehicle	Total
LR	10hrs	4.5hrs	6hrs	20.5hrs
MR	10hrs	4.5hrs	6hrs	20.5hrs
HR	10hrs	4.5hrs	10hrs	24.5hrs
HC	4hrs	4hrs	11hrs	19hrs
MC	10hrs	4hrs	11.5hrs	25.5hrs

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- We support the increased emphasis on achieving and demonstrating competencies rather than seat time, aligning with industry's focus on practical safety outcomes.
- The curriculum should place stronger emphasis on braking and gearing on steep grades, as well as understanding vehicle dynamics, including inertia, load shift, and high centre of gravity.
- Training scenarios should reflect realistic operating environments such as quarry access roads, steep inclines, and varied load conditions to ensure job readiness.
- Consistency of delivery across jurisdictions is critical, including access to appropriately equipped vehicles and nationally aligned assessment criteria.
- Trainer qualifications and assessment auditing mechanisms should be strengthened to ensure competency consistency across providers.
- Online learning for theoretical modules is supported to reduce face-to-face duration without diminishing learning quality.
- The training framework should clearly link improved driver competence with productivity, fuel efficiency, and reduced maintenance costs.

CCAA Recommendations

- Review and rebalance the total course duration, ensuring training efficiency while maintaining competency assurance and safety outcomes.
- Enhance curriculum focus on braking, gearing, and load management, particularly on steep grades and under varying load conditions relevant to concrete and quarry operations.
- Include explicit and detailed training content on managing vehicles with a high centre of gravity, controlling inertia, and preventing load shift — recognising that many heavy vehicles in our industry (e.g., concrete agitators, tippers, and tankers) are at heightened rollover risk due to these dynamics.
- Integrate practical demonstrations and simulations showing how improper gear selection or braking technique can exacerbate instability, and how correct control methods mitigate risk.
- Include industry-specific operating contexts (e.g., quarry haul routes, unsealed surfaces, and gradient transitions) in both theoretical and practical training components.
- Maintain strong competency assurance through standardised assessment criteria, nationally consistent trainer qualifications, and effective auditing of delivery.
- Adopt blended learning models for theory-based content (e.g., regulatory and maintenance topics) to maximise accessibility and reduce total training time without compromising learning outcomes.
- Link framework outcomes to measurable improvements in safety, efficiency, and vehicle handling performance, ensuring tangible benefits to both industry and regulators.

Conclusion

CCAA supports the principle of a strengthened, nationally consistent HR driver competency framework. However, adjustments are required to ensure the program remains accessible, practical, and aligned with the operational realities of the construction materials industry. We look forward to continued engagement to finalise a framework that promotes safety excellence and workforce accessibility.

Should officials wish to discuss this matter, please contact CCAA's Industry Policy Director, Mr David Rynne via david.rynne@ccaa.com.au and 0431 729 509.

Yours sincerely

MICHAEL KILGARIFF
Chief Executive Officer

About the CCAA

CCAA is the voice of the $15 Billion heavy construction materials industry representing cement manufacturers, concrete suppliers, and extractive operators throughout Australia.

Our members range from large global companies to SMEs and family operated businesses and are engaged in the quarrying of sand, stone and gravel, the manufacture of cement and the supply of pre-mixed concrete.

These businesses service local, regional, and national construction and infrastructure markets to meet Australia's building and construction needs through the provision of roads, railways, bridges, ports, airports, hospitals, schools, and footpaths.