

15 October 2021



Mr Mark McKenzie
Chair, Transport & Logistics IRC.
AUSTRALIAN INDUSTRY STANDARDS
Level 2, 31 Market Street,
South Melbourne, Victoria, 3205
Via leisa.weightman@aistnds.org.au

GAS ENERGY AUSTRALIA RESPONSE: AUSTRALIAN INDUSTRY STANDARDS HEAVY VEHICLE APPRENTICESHIP MODEL CONSULTATION SEPT 2021

Dear Mark

Gas Energy Australia (GEA) appreciates the opportunity to respond to the Australian Industry Standards (AIS) consultation paper on a Heavy Vehicle Apprenticeship Model. The consultation paper requested feedback on specific questions about the contents and entry to an apprenticeship. But there are structural issues GEA considers should be explored before committing to a heavy vehicle apprenticeship model. In line with this, our members have provided the following general feedback.

GEA members support the professionalisation of road transport skills. That said, while the benefits and implementation of skills are considered in the consultation paper, it is not clear how a new trade qualification would integrate and fit with existing structures. GEA would be concerned if a stand-alone apprenticeship was to build a silo around heavy vehicle operations that could become a barrier to occupations that require a heavy vehicle licence and specialist skill set to operate.

Further, in relation to pathways and skill progression, GEA members could not identify in the paper how an apprenticeship could be leveraged for career progression to specialist tasks such as the dangerous goods industry. There is a minimum requirement that a dangerous goods driver should have a five year driving history as well as completion of a unit of competency (unit TLILIC0001) in dangerous goods before they can become licenced. Putting a four year apprenticeship in front of the career pathway for a dangerous goods driver makes for a long development time frame.

GEA members also expressed concerned that there are limited numbers of transport companies that could provide the breadth of training and supervision to an apprentice to achieve the competencies required. For example, a dangerous goods operator who specialises in bulk deliveries would not be able to provide manual handling experience within their workplace.

In conclusion, GEA supports the professionalisation of road transport skills but remains unconvinced that an apprenticeship pathway would offer a solution without creating barriers for our industry. We look forward to the AIS exploring the structural issues of integration with other trades, career progression and training and supervision so that all heavy vehicle transport operators have a framework to improve the professionalism of heavy vehicle drivers.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a horizontal line drawn through it.

John Griffiths CEO