



TRANSPORT AND LOGISTICS IRC SKILLS FORECAST KEY FINDINGS DISCUSSION PAPER 2017

AUSTRALIAN TRUCKING ASSOCIATION SUBMISSION 20 MARCH 2017

1. About the Australian Trucking Association

The Australian Trucking Association (ATA) is the peak body representing trucking operators. Its members include state and sector associations, some of Australia's major logistics companies and businesses with leading expertise in truck technology. Through its members, the ATA represents many thousands of trucking businesses, ranging from owner drivers to large fleets.

2. Summary

In August 2016, Australian Industry Standards (AIS) released an issues paper with a summary of key industry and skills related trends, and invited feedback to help inform the four year work plan for the Transport and Logistics Training Package.

In response to the issues paper, the ATA provided a submission which put forward that the two highest priorities should be to:

- address the concerns of the trucking and driver training industries about the quality of heavy vehicle driver training, and
- liaise with Austroads and implement any changes to the driver training packages that are required as a result of the national heavy vehicle driver competency review.

In March 2017, AIS released its follow up discussion paper, which provides a summary of the key findings from the recent industry intelligence gathering activities. The acknowledged purpose of the discussion paper is to validate and confirm the findings and it asks for feedback that either confirms an issue has been covered, or else raises an issue that should be addressed in the proposed schedule of work.¹

The ATA is unable to validate or confirm the findings in the discussion paper as it does not address the two high priority issues nominated by the ATA in response to the issues paper. Further to this, the discussion paper essentially repeats the issues paper. The skills issues raised through the consultation process have not been incorporated.

In response to the discussion paper, the ATA again raises our concern about the quality and consistency of driver training, which is of vital safety importance for the industry, and make some further comments about the regulatory environment, the ageing workforce, responding to technological change, and the importance in improving transparency to increase understanding of the data that informs the discussion paper.

¹ Australian Industry Standards, *Transport and Logistics IRC Skills Forecast Key Findings Discussion Paper 2017*, March 2017, 1.

3. Safety

Heavy vehicle driver training

The discussion paper makes no mention of safety as a skills issue – despite the paramount importance in the transport industry for personnel to achieve safe outcomes and a safe workplace.

Authoritative figures show that the rate of fatal articulated truck crashes fell 80 per cent between 1982 and 2015, despite the enormous growth in the number of trucks on the road. These figures were prepared by the Centre for Automotive Safety Research (CASR) at the University of Adelaide from government statistics. Despite the industry's improving safety record, even one accident is unacceptable.

In evidence to the Senate inquiry into aspects of road safety in Australia, the ATA raised significant concerns with the quality and consistency in training and assessment of heavy vehicle drivers. Whilst there are many excellent trainers, others train to a price and can be more focused on how long a course will take, and not on the level of competency attained. This contributes to a highly variable quality of training and assessment of truck drivers. Operators are particularly concerned about the variable quality of training in chain of responsibility, load restraint, fatigue management and work health and safety.

Austrroads will also be conducting a review of the National Heavy Vehicle Competency Standards. AIS should acknowledge this issue and prepare to implement any recommended changes that may arise from the review.

Light vehicle driver training

Road safety statistics show that a large number of accidents between trucks and light vehicles are due to mistakes by the light vehicle driver. For example:

- there were 88 fatal crashes in **South Australia** between 2011 and 2015 that involved heavy vehicles, of which 91 per cent involved a light vehicle, pedestrian or cyclist. The heavy vehicle driver was deemed responsible in 20 per cent of these crashes.^[1]
- in its 2015 major accident investigation report, Australia's leading truck insurer, NTI, concluded that the truck was not at fault in 84 per cent of the fatal multi-vehicle accidents involving trucks that it considered.^[2]

Despite these findings, educating light vehicle drivers about how to share the road safely with trucks has only received sporadic policy attention in Australia.

To improve safety for all road users, including heavy vehicle drivers and the road transport industry, light vehicle driving training standards and competencies should be reviewed to include awareness of sharing the road safely with heavy vehicles.

This should include reviews of the following courses, units and skills sets:

- TLI41216: Certificate IV in Transport and Logistics (Road Transport - Car Driving Instruction).

^[1] SA Department of Planning, Transport and Infrastructure, [Heavy vehicle drivers involved in road crashes in South Australia](#). Fact sheet, August 2016.

^[2] National Truck Accident Research Centre, [2015 Major Accident Investigation Report](#). 2015, 7.

- TLIC3036: Apply safe car driving behaviours.
- TLIM0001: Conduct learner driver training.
- TLIM4001: Develop safe car driving behaviours in others.
- TLISS00162: Driving Instructor Skill Set.

These reviews should be conducted in 2018-19.

4. Regulatory environment

The regulatory environment affecting the industry in every state and territory except for WA and the NT is the Heavy Vehicle National Law (HVNL). In 2016, the Queensland parliament passed key amendments to this legislation, and preparing for this changed regulatory environment should be acknowledged as a key skills issue.

The legislation will introduce important changes to the chain of responsibility in early 2018, and the Transport and Logistics IRC will need to continue to focus on rewriting the relevant units of competency to ensure they reflect the new regulatory requirements.

The ATA considers that the following units should be revised as a matter of priority:

- TLIF0001: Apply chain of responsibility legislation, regulations and workplace procedures.
- TLIF0002: Administer chain of responsibility policies and procedures.
- TLIF0003: Develop and implement policies and procedures to ensure chain of responsibility compliance.

These reviews should be conducted in 2017-18.

For example, performance criteria 1.4 under each of these three units refers to reasonable steps, which does not reflect the changes to the HVNL which will come into effect in 2018. The units should also be amended to include reference to general safety duties and the due diligence obligations on the executives of chain parties.

The review of these units must incorporate a national perspective, and as such specifically incorporate the requirements that apply in Western Australia and the Northern Territory (which have not applied the HVNL).

Element one of the above mentioned units and the associated performance criteria makes reference to explaining the responsibilities that apply in the HVNL or applicable state/territory law, but without a clear reference to understanding that different requirements apply in different jurisdictions.

The units should include criteria to understand the key differences between the HVNL and the requirements in Western Australia and the Northern Territory.

Further to this, other issues on the National Heavy Vehicle Regulator's forward agenda may impact on skills and workforce training needs, such as the effect of the online permit application portal and changing how routes are scheduled, should be included. This should be incorporated into:

- Certificate II in Road Transport Yard Operations (Freight Handler).

- TLIH2001: Interpret road maps and navigate pre-determined routes.
- The new schedulers qualification that AISC has agreed to develop.

5. Ageing workforce, industry attraction and diversity

The ATA agrees that the ageing of the workforce and attraction of the industry to potential employees are critical skills issues.

A report by Volvo in May 2016, *Professional Truck Driver Shortage*, reported that 88 percent of survey respondents believe there is a negative image of truck drivers in Australia, and 77 percent believe that driver image in Australia is outdated.²

The survey found that truck driver employers find it difficult to attract both the quantity and quality of drivers required. It reported that 52 percent face difficulties in attracting the quantity of drivers needed, and 46 percent at the time of the survey were experiencing a shortage at that time.³

The impact of this skills shortage is increased by the variable outcomes and quality in driver training discussed in section three of this submission.

Critically, the survey also found that 82 percent faced issues in attracting the quality of drivers expected to do the job,⁴ illustrating that issues around the quality and consistency of driver training is contributing to the skills gap.

The final report should refer to the work done by Volvo as an important contribution to assessing the skill needs of employers.

With regard to the discussion paper's findings on diversity, the ATA recommends that AIS should include more information than just what it has sourced from recent media articles.

The findings in the transport and logistics sector should be based on comprehensive statistical information that enables comparisons to other industries and by business type, including through information sourced from the Workplace Gender Equality Agency.

6. Responding to technological change

In the discussion paper, skills issues identified as a result of technological change dominate the skills issues list. While technological change is important and should be included in the paper, it should not replace addressing other pressing skills issues, such as those raised in this response relating to safety and the consistency of driver training.

Fully automated vehicles are unlikely to operate in a commercial or large-scale capacity on public Australian roads in the near to medium term future, and the focus for heavy vehicles and the related skills issues is more likely to see increasing levels of automation and driver assist technologies, with a human driver still ultimately in control of the vehicle.

Other issues of technological change, as raised in the ATA response to the issues paper in September 2016, include technological change relating to reducing time and costs spent on

² Volvo Group Australia, *Professional Truck Driver Shortage*, May 2016, 9.

³ Ibid, 7.

⁴ Ibid, 7.

data entry, providing customers with real time access to track products, improved cost tracking on a job by job basis, and improved engagement with a mobile workforce. These factors present increased training needs for industry such as in the use of new devices and software, and in device and data management.

7. Understanding the data

As the information and data informing the discussion paper will help to determine the four year schedule of work, the ATA recommends that AIS should increase the transparency and release the information that is informing the discussion paper.

Increased transparency around this information would assist in reducing concerns that issues raised through the consultation process are not being incorporated by AIS, and that instead only a pre-determined agenda is being pursued.

Specifically, the ATA recommends that AIS should release information on the:

- Number of submissions received in response to the issues paper.
- Issues raised by industry and stakeholders, including those which have not been included in the discussion paper.
- Representation across the states, including if there were any state-centric themes.

On the IRC Skills Forecast Survey, this should include information on:

- How long was the survey open for and accessible to stakeholders.
 - Feedback received by the ATA suggests the survey was only accessible to some stakeholders for 7 business days, which would be an insufficient consultation timeframe.
- The response rate and total response to the survey.
- Issues raised and rankings of the survey responses.
- The representation of people completing the survey from the transport and logistics sector, and the breakdown of this group (such as by state).
- If specific skill needs were present in certain states.

The ATA notes that the former Transport and Logistics Industry Skills Council used to publish infographics about the industry's skills statistics, including information such as challenges, opportunities, employment growth, facts and figures, statistics on employer identified skill needs, statistics on employer reported methods for meeting labour demand, statistics on workers aged 45 years and older, and skills in demand. The ATA recommends that AIS continue this approach.