

20 June 2024

**Proposed changes to repair classes and qualifications**  
**Remake of the *Motor Vehicle Dealers and Repairers Regulation 2014***

To whom it may concern

Heavy Vehicle Industry Australia (HVIA) is the peak industry association for Australian manufacturers of trucks and trailers (collectively referred to as heavy vehicles), as well as the dealerships, repairers, suppliers, and service providers that support the entire industry. We represent almost every major truck manufacturer/importer, all of Australia's major trailer manufacturers, and an ever-growing list of their component, equipment and technology providers.

Our 300-plus corporate members collectively employ a local workforce of over 70,000 staff. Our member's interests cover an extensive range of vehicles, starting with 3.5-tonne light commercial trucks, and extending all the way up to Australia's unique 50-metre long, 100-tonne road trains.

Our industry provides some of the world's most efficient, safe, innovative, and technologically advanced vehicles. HVIA seeks to work with government and industry stakeholders to promote an innovative and prosperous industry that supports a safe and productive heavy vehicle fleet operating for the benefit of all Australians.

We appreciate the challenge for the Australian transport ecosystem in transitioning to net zero, which will necessitate changes in a whole raft of unanticipated areas. However, we caution NSW Fair Trading against creating unnecessary and overly onerous changes which inhibit NSW's ability to attract the necessary workforce to make the net zero transport transition. The present approach affects existing practices which do not require changes – in particular, the splitting of light and heavy vehicle skill sets and licencing of tyre fitting – and creates a duplication in skill sets related to electric vehicles, namely the overlap between AURSS00063 and AURSS00064 (64 and 64 hereafter).

Below we detail the concerns raised across the heavy vehicle industry.

**Skill Set 63/64**

Requiring both 63 and 64 is unnecessary and will put needless costs on industry and individuals. The other elements for consideration are the impact on skilled migration and national operators. Any technician that enters Australia or works out of NSW would have to obtain both 63 and 64. This equates to two weeks of extra training and costs of \$2000+ extra from employers unless there are heavy subsidies. This will present a barrier to NSW attracting skilled individuals to join the industry, and could result in a further shortage in skilled persons.

**Tyre fitting**

Tyre fitting is already included in the qualifications for heavy vehicles and does not require a separate licence. This would be doubling up of skills and create unnecessary administrative work as well as increasing costs for industry.

**Splitting light and heavy classes**

As raised during the information session by other attendees, there is serious concern from industry about the impact of the licence changes on regional businesses. Many repairers employ small numbers of staff who are able to work on both light and heavy vehicles as required.

**Terminology**

There is a growing recognition across the industry that the term “mechanic” is outdated and that the preference is for “technician”.

We are happy to provide further information on anything included in this submission, or more generally as it pertains to heavy vehicles. You can reach our Chief Advocacy Officer, Adele Lausberg, here: [a.lausberg@hvia.asn.au](mailto:a.lausberg@hvia.asn.au).

Yours sincerely



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