

# Bulletin

## Automotive Repairers Division and Automotive Electrical Division



Reference No. LVT License conditions Member Survey/jk-04-23

Date: 21/04/2023

Dear member

Please be advised, VicRoads are currently undertaking a review of the Licensed Vehicle Tester (LVT) licensing conditions and have engaged VACC to review and endorse on behalf of the industry. While most of the proposed changes will have no immediate impacts on current LVTs, VACC has raised concerns with the Vehicle Safety and Compliance Department regarding car parking requirements, a longstanding issue often reported to us by our members. Currently, a business making an application must have a minimum of four allocated secure onsite parking spots, and must also be stated on the lease. This condition was added to the licensing conditions in 2015 without proper consultation.

VACC is aware of personal views from within the department that the rule is necessary for customer convenience and safety, however this is not consistent with the Act or Regulations and potentially goes beyond the department's administrative decision-making duties. VACC is currently reviewing and is seeking a legal opinion which will review some departmental decisions to ensure the decision has been made correctly. In the meantime, VACC is advocating for the removal of the parking condition in favor for a less onerous set of conditions where new LVT applications are considered based on geographical demand and necessity for roadworthy services to the local community, particularly where there is sufficient on street parking available nearby.

Not only does this rule impact negatively on new applicants, but it also places current LVTs who don't meet this requirement (should they be removed from the Scheme) or have to relocate and are unable to acquire a suitable location. This is true where a business must relocate due to end of lease, or compulsory acquisition. Also, businesses who are currently protected under a grandfather clause are at risk and financially exposed if they decide to sell their business, given a license is not transferrable. For example, if you hold an LVT license for 20 years and decide to sell the business, the prospective buyer will not have an opportunity to become an LVT because of this rule.

VACC is of the view that this business rule creates an unfair and unreasonable barrier of entry for small businesses. However, to substantiate the magnitude of this issue we would appreciate a couple of minutes of your time to answer a few questions.

Rest assured your personal details will remain confidential.

Closing date 28 April 2023.

Please click the button below to take this survey.



In the meantime, feel free to contact me if you wish to discuss this further.

Thank you

**John Khoury**  
Industry Policy Advisor