

29 April 2025



Submission to Ministry of Transport

Proposed Improvements to New Zealand's Graduated Driver Licensing System

Introduction

1. The Timaru District Council thanks the Ministry of Transport (MOT) for the opportunity to provide comment on the Proposed Improvements to New Zealand's Graduated Driver Licensing System.
2. This submission is made by the Timaru District Council, 2 King George Place, Timaru. The contact person is Suzy Ratahi, Land Transport Manager, Timaru District Council. Suzy can be contacted on (03) 687 7200.
3. Timaru District Council (TDC) is a local authority, serving over 46,000 people in South Canterbury. The main centre is Timaru, with other smaller settlements of Geraldine, Pleasant Point and Temuka.
4. Timaru District Council is represented on the Regional Transport Committee.
5. We recognise the importance of driver licencing to our District in terms of independence and job prospects for individuals, connectivity and social wellbeing for our communities and economic productivity.
6. Data from 2018 shows that 9.2% of Timaru District's population aged 16+ has no driver licence; 4.2% has a learner licence; 5.3% has a restricted licence and 81.3% hold a full Class 1 licence. This equates to just over 6,900 people in Timaru District with either no licence, or a learner or a car restricted licence only.

General submissions

7. TDC has read and supports the press release made by the Driving Change Network on this proposal¹.
8. TDC recognises the important role which licensing systems play in developing (or detracting) driver capability and safe driving behaviour.
9. TDC believes changes to our current licensing system are needed as 18–24-year-olds have the highest rate of road deaths in New Zealand, and they are nearly three times as likely to die in a road crash as 18-24 year olds in Australia².

¹ <https://www.scoop.co.nz/stories/PO2504/S00073/driving-change-network-response-to-governments-proposed-driver-licensing-changes.htm>

² * International Transport Forum Road Safety Annual Report 2023

10. TDC acknowledges the intent to improve access and lower costs for drivers. We understand there are inequalities to obtaining a full driver licence and welcome moves to improve equity and remove barriers but not at the cost of safety.
11. TDC further notes that the Government Policy Statement on land transport 2024 deprioritised investment in the road safety promotion activity class. Without that dedicated funding for research-based interventions to change driver behaviour, we are increasingly concerned that death and serious crashes on our roads will increase, and so it is more crucial than ever to ensure legislation supports better training of our drivers through the requirements of the Graduated Driver Licensing System.

Proposal 1 – remove the full test and introduce mitigations to maintain safety outcomes

12. TDC is not opposed in principle to the removal of the full drivers' licence test, however, TDC believes in retaining a pathway to a full licence which combines verified good behaviour, a minimum time period for progression and structured driver education – not just the removal of a test.
13. TDC would like to see a minimum number of 80-100 logged on-road hours introduced starting during the supervised learner phase and increasing during the restricted phase to ensure practical driving experience and real-world skill development, with at least 30 of these hours being undertaken in complex driving conditions e.g. night driving, high-speed environments etc.
14. This recommendation is backed by The Centre for Automotive Safety Research³, at The University of Adelaide which benchmarked the New Zealand driver licensing system against 16 comparable jurisdictions around the world. These included every Australian and some US states, Japan, and European countries like Norway, Sweden, Ireland, and the UK. The report notes (p.5) that the two main predictors of crash reductions among novice drivers are a minimum time period for progression (which is shown to have a protective effect) combined with an optimised amount of supervised driving experience, which is defined as below:

The optimal amount of supervised driving experience in terms of distance covered has been estimated at 5,000 to 7,000 km, which is likely to be between 80 to 100 hours minimum to about 120 to 140 hours maximum, during which the increased supervised driving experience gained outweighs the increased risk of crash due to increased exposure (Sagberg, 2002; cited in Senserrick & Williams, 2015).

15. TDC is concerned that the proposal at present sends the wrong message: that a licence can be earned by simply *not being caught doing wrong*, rather than by demonstrating the skills, knowledge, and experience required to drive safely. While good behaviour is important, it is no substitute for structured, practical learning and assessment.
16. TDC supports hazard perception training, however, there is a lack of research on whether drivers' scores on digital hazard perception tests translate to reduced crash rates during real driving. For this reason, TDC would prefer that hazard exercises take place in a real on-road exercises.

³ <https://www.aa.co.nz/content/dam/nzaa/about/research-foundation/driver-licensing/CASR236-Final.pdf>

Proposal 2 – introduce a clean driving requirement to the restricted licence

17. We support the proposal of an 18-month “good behaviour” period, with the clock resetting back to zero for any driving-related offences.

Proposal 3 – require the demerit threshold for novice drivers to have their licence suspended

18. TDC supports the reduced demerit threshold for novice drivers.

Proposal 4 – introduce a zero-alcohol limit for novice drivers

19. TDC also supports a zero-alcohol limit for novice drivers.
20. We wish to see this extended further to a zero-tolerance blood concentration level for any drug specified in the Land Transport (Drug Driving) Amendment Act 2022 for which the driver does not have a medical prescription.

Proposal 5 – improve NZTA’s oversight of approved advanced driver courses

21. TDC supports any changes which give NZTA more scope to ensure that approved driving courses are being delivered to standard, and to suspend or revoke providers when necessary.
22. TDC further supports giving NZTA the ability to vet other potentially suitable course providers and add them to the approved courses list.
23. Currently the Rule allows for participants who complete advanced driver training courses to spend a reduced minimum time period on a restricted licence. While TDC supports advanced driver training courses which teach skills to improve vehicle handling and hazard perception, we do not support a reduction of time period and we seek that this provision be disestablished from legislation.
24. Getting one’s licence early appears to counteract the safety benefits of training. Research from 2019 shows significantly lower crash rates from trained drivers who do not accept the time discount. Time discount policies have been evaluated in Canada and New Zealand and these mostly show increased crashes and violations. No studies found a positive safety impact from time discounts⁴.
25. TDC recommends that the Ministry of Transport consider incentives other than time reductions to encourage drivers to undertake approved advanced driver courses.

Proposal 6 – reduce the number of vision tests

26. TDC is strongly opposed to the proposal to reduce the frequency of vision testing to only two occasions before the age of 75, those being whenever you apply for your first New

⁴ <https://www.nzta.govt.nz/assets/resources/research/reports/677/677-the-effectiveness-of-advanced-driver-training-summary.pdf>

Zealand licence, and when you first renew your licence after you turn 45. This means some individuals may not be required to have an eye test for 30 years after first obtaining their learner licence.

27. Vision changes gradually over time, and around the age of 40, individuals may develop the first signs of presbyopia, a condition where the eye's lens loses its flexibility and ability to focus on close objects. People can also develop moderate to severe eye health conditions before the age of 40 due to diabetes, high blood pressure, smoking, poor diet, prolonged screen time, systemic disease or hereditary eye conditions. From the age of 45 onwards, vision can change to a minimal or moderate degree over a two-year period which is why optometrists recommend two-yearly check-ups.
28. TDC is strongly opposed to relying on self-reported declarations of vision not deteriorating. Aside from introducing the potential for deliberate omissions or lies, as vision deterioration is often subtle sometimes signs go unnoticed by the individual and are only picked up because of a need to renew one's drivers' licence. Drivers who are unable to accurately perceive light, shape, movement, distance, and depth put themselves and other road users at risk.
29. TDC supports the introduction of digital licensing services to enable more people to do things at home and reduce the need to fill out paper forms, similar to Australia. We would recommend that vision screening continue to be done in person at licensing agents or optometrists but that certificates from vision screening taken within the last month could be uploaded digitally to support online licence renewal processes.

Conclusion

30. TDC would again like to thank MOT for the opportunity to respond to this proposal. We welcome the proposal for a zero-alcohol limit for all learner and restricted drivers, and support moves to digitise services and reduce cost barriers. However, we recommend that the Ministry balance these factors with the responsibility to ensure that all drivers are skilled, confident, and safe on our roads, while aligning with the Government's goals and local priorities. We are eager to ensure that changes to the licensing system are carefully thought through and based on national and international evidence, not selective picking of certain features of overseas systems. We are aware that many of our transport partners and industry peers share similar views on the proposed changes and encourage MOT to proactively and meaningfully engage with the sector while drafting the next iteration of the Rule.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nigel Bowen', followed by a small blue dot.

Nigel Bowen
Mayor