



SUBMISSION

To: Ministry of Transport

Submission: New Zealand Graduated Driver Licensing System (GDLS)

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Sent to: GDLS@transport.govt.nz

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Ia Ara Aotearoa Transporting New Zealand submission to the Ministry of Transport on New Zealand's Graduated Driver Licensing System (GDLS or licensing system)

Introduction

- 1 The Ministry of Transport (MoT) is consulting on New Zealand's Graduated Driver Licensing System (GDLS or licensing system).
- 2 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) welcomes the opportunity to make a submission on MoT's proposal.

Background

- 3 This initiative is part of the Government's plan to improve road safety by focussing on safer drivers. This action to improve the GDLS takes evidence-based road safety strategies into account (for example, ensuring drivers are adequately trained), alongside making a licence cheaper and easier to obtain.
- 4 The changes are focussed on New Zealand Class 1 (car) licence holders progressing through the licensing system.
- 5 It is proposed that the full test (the practical test currently undertaken at the end of a driver's restricted period) be removed, and mitigations be introduced for drivers during their restricted period of driving. The proposed mitigations are a clean driving record requirement in the restricted stage, a reduced demerit threshold for novice drivers and a zero-alcohol limit for novice drivers.
- 6 Transporting New Zealand's comments are primarily focussed on the impacts on the road freight sector.

Transporting New Zealand general comments

- 7 The success of the road freight industry is critically dependent on the competence and availability of appropriately licensed drivers. Therefore, this issue is one that Transporting New Zealand has great interest in.
- 8 The consultation document provided by the Ministry of Transport advises that young people (16-24 years) are overrepresented in road crashes. In 2024, young drivers (16-24 years) made up 12 percent of licensed drivers, but were responsible for 24 percent of serious injury crashes and 22 percent of fatal crashes.
- 9 The disproportionately high percentage of young driver deaths in crashes is a regular annual occurrence and is demonstrated in Figures 1 and 2 Appendix A which shows deaths in crashes with young drivers at fault over the period 1984 to 2023 and the total number of deaths over the period 1990 to 2023.
- 10 It was difficult to find current data however, from what Transporting New Zealand understands, this characteristic of young drivers being overrepresented in death and serious injury crashes is a global problem. Appendix B, Figure 1: *Young Driver and All Driver Deaths in OECD Countries 2004* is from a 2006 OECD Transport Research Centre report showing that across 26 OECD countries, the respective percentages of young drivers involved in fatal crashes ranged from 13.4 to 32.2 percent.
- 11 Appendix B, Figure 1: *Proportion of young people in traffic fatalities and population* from the same OECD report shows the disproportionate representation of young drivers in

fatal crashes collectively across OECD countries.

- 12 New Zealand's GDLS requirements for a second test are more stringent than most overseas jurisdictions. Most jurisdictions have never featured a second practical test. The only overseas jurisdictions currently requiring such a test are Luxembourg, and the Canadian provinces of Alberta, Ontario, and British Columbia. New South Wales removed their practical full test in 2017 due to a lack of evidence to support its efficacy.
- 13 Despite the GDLS having two practical driving assessments, one at the "Restricted" stage and another to gain a "Full" licence, our young drivers are still overrepresented in death and serious injury. Nearly half of the countries assessed in the 2006 OECD report had lower percentages of young driver fatal crash involvement than New Zealand's.
- 14 Accurately comparing international statistics on young drivers is difficult however, there seems no doubt that despite the GDLS appearing to be more rigorous with two practical assessments, our safety performance is not significantly better. According to the AA, New Zealand's young drivers have the highest rates of road deaths in the OECD¹.
- 15 Transporting New Zealand was unable to find any substantive research to support the efficacy of the full test.
- 16 According to the Ministry of Transport, as of 21 January 2025, 262,581 drivers are on their learner licence and 284,247 drivers are on their restricted licence. The full test is approximately 30 minutes and normally costs \$98.90 for up to two attempts. Therefore, removing the need for the final test would affect the almost 550,000 people currently moving through the licensing process and relieve them of the need to pay approximately \$55 million.
- 17 The Minister of Transport's paper to the Cabinet Economic Policy Committee seeking agreement to undertake this consultation document included the following advice:
 - this initiative delivers on the commitment in the Government's Road Safety Objectives to identify opportunities to improve the GDLS, taking into account road safety outcomes, alongside making a licence cheaper and easier to obtain
 - There are wide economic benefits to New Zealand from more people having a full licence by improving access to jobs, education, healthcare or other services. Unlicensed drivers, or inexperienced drivers in breach of licence conditions, pose a safety risk to themselves and other road users. There are also impacts on the justice system if people are referred to the court for unpaid traffic offence fines.
 - the full test may not be the best option for safety. New Zealand's double practical test approach is uncommon
 - other jurisdictions instead impose stricter requirements on novice drivers, such as longer learner and restricted stages or a lower demerit threshold
 - that a clean driving record over a two-year period was a stronger predictor of subsequent crash risk involvement than an exit test.
- 18 The Interim Regulatory Impact Statement associated with the Cabinet paper notes "For drivers, the economic benefits of driver licensing are particularly high. Benefits to drivers

¹ <https://www.nzherald.co.nz/nz/road-toll-young-driver-road-deaths-remain-high-despite-committing-fewer-traffic-offences/IGKGJXU6YZHH7PRWN2SFHRQLLY/>

from improving access to driver licensing are stronger for low income and rural residents. Ongoing benefit from the preferred package are expected to exceed costs for drivers and suppliers. The package components are designed to work together to benefit accessibility and efficiency for suppliers without diminishing safety outcomes. ...Benefits from the proposed safety measures are expected to offset any possible negative effects on safety of removing the full test.”

- 19 Given there is no substantive evidence to support or justify New Zealand’s GDLS including a final practical test Transporting New Zealand supports the Minister’s proposal to remove unnecessary barriers to progress through the licensing system and change the rule to add other risk mitigations. International practice indicates the proposed change is a more rational approach and should lead to better safety outcomes.

Transporting New Zealand responses to the specific consultation questions

Question 1: Do you support removing the full licence test with the proposed safety mitigations? If not, why not?

- 20 Based on the comments in paragraphs 7 to 19 above, Transporting New Zealand supports removing the full licence test with the proposed safety mitigations.

Question 2: Do you support a zero-tolerance clean driving record requirement in the restricted stage?

- 21 Transporting New Zealand supports a zero-tolerance clean driving record requirement in the restricted stage?

Question 3: Do you support halving the demerit threshold for learner and restricted licence holders?

- 22 The [demerit point system](#) includes allocating points in amounts of 10, 20, 25 and 35, 40, 50 and 75, dependent on the offence. It is a risk-based system with more serious offences attracting higher points. Reducing the demerit threshold to 50 points or more would mean if a driver on their learner or restricted licence gets 50 or more demerit points their licence will be suspended and they cannot drive until their licence has been reinstated. At the end of their suspension the driver would need to go through the process of having their licence reinstated. Transporting New Zealand believes the reduced threshold is reasonable insofar as it allows for novice drivers to commit some minor offences without being overly harshly penalised.

- 23 Transporting New Zealand agrees with having risk mitigations designed to encourage inexperienced drivers to drive safely, or risk having to spend longer on their restricted licence. Transporting New Zealand supports halving the demerit threshold for learner and restricted licence holders.

Question 4: Do you support a zero-alcohol limit for learner and restricted licence holders?

- 24 Transporting New Zealand notes the Ministry of Transport’s advice that that even small amounts of alcohol result in increased crash risk, which can particularly affect those learning to drive. Transporting New Zealand also notes that Australia and other comparable countries have zero-alcohol limits for all novice drivers.

- 25 Transporting New Zealand agrees with having risk mitigations designed to encourage inexperienced drivers to drive safely, or risk having to spend longer on their restricted

licence. Transporting New Zealand supports support a zero-alcohol limit for learner and restricted licence holders.

Question 5: Do you support the proposed changes to NZTA's oversight of course providers?

- 26 The integrity of the course provider system is important to safety outcomes. Transporting New Zealand conditionally supports giving NZTA greater authority to assess the suitability of course providers and to suspend or revoke their approval when necessary.
- 27 Transporting New Zealand is aware that consistently delivering a high-integrity, quality service across a large customer base is challenging. Issues in service quality have arisen in the areas of vehicle inspection, engineering certification, driver training and driver assessment. Therefore, Transporting New Zealand's proviso is that NZTA work with the course provider sector to develop systems and processes to ensure there is fairness and transparency in service delivery across the sector.

Question 6: Do you support the reduced eyesight testing requirements?

- 28 Transporting New Zealand understands that the respective risk is still being managed because in place of a vision test, the driver will instead need to declare that their vision has not deteriorated since their last vision test. Furthermore, this change would apply to Class 1 (car) and Class 6 (motorcycle) licences. The vision testing requirements would not change for those over 75 years, reinstatements, overseas conversions, or heavy vehicle licences.
- 29 Neither NZTA or the Ministry of Transport appear to have provided any benefit/costs or risk assessment of this change. Based on advice in the Cabinet paper that the benefits from the proposed safety measures are expected to offset any possible negative safety effects of removing the full test, Transporting New Zealand supports reduced eyesight testing requirements.

Question 7: Do you have any other comments on any of the proposed changes?

- 30 Transporting New Zealand supports the Minister removing unnecessary barriers to progress through the licensing system. There is no substantive evidence to support New Zealand's GDLS including a final practical test. Aligning with good practice overseas and changing the rule to add other risk mitigations is a better, more rational approach.

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This submission does not include any comments of a commercially sensitive nature. Transporting New Zealand agrees to the submission being made publicly available and it being identified as the submitter.

About Iā Ara Aotearoa Transporting New Zealand

Iā Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our focus areas for the period 2025 to 2027:

- Advocacy and policy
- Improving infrastructure to improve productivity
- Making our industry and our members businesses stronger and more resilient
- Sustainability
- Transporting New Zealand business performance

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

END

Appendix A

Source: Ministry of Transport

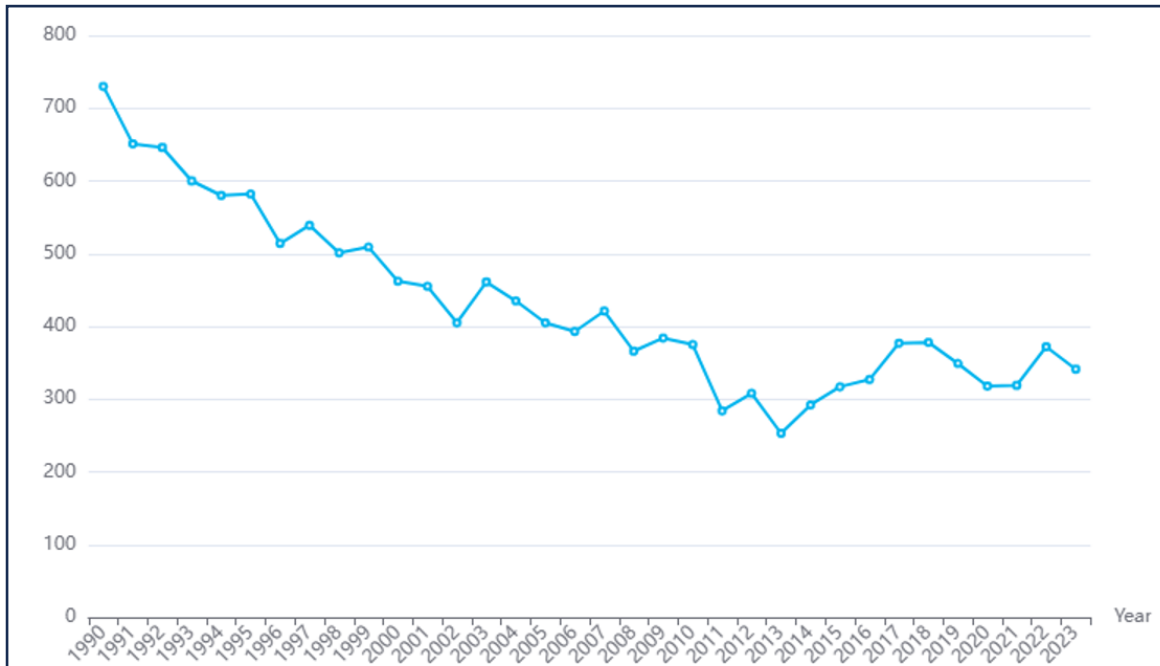


Figure 1: All deaths in New Zealand motor vehicle crashes 1990 -2023

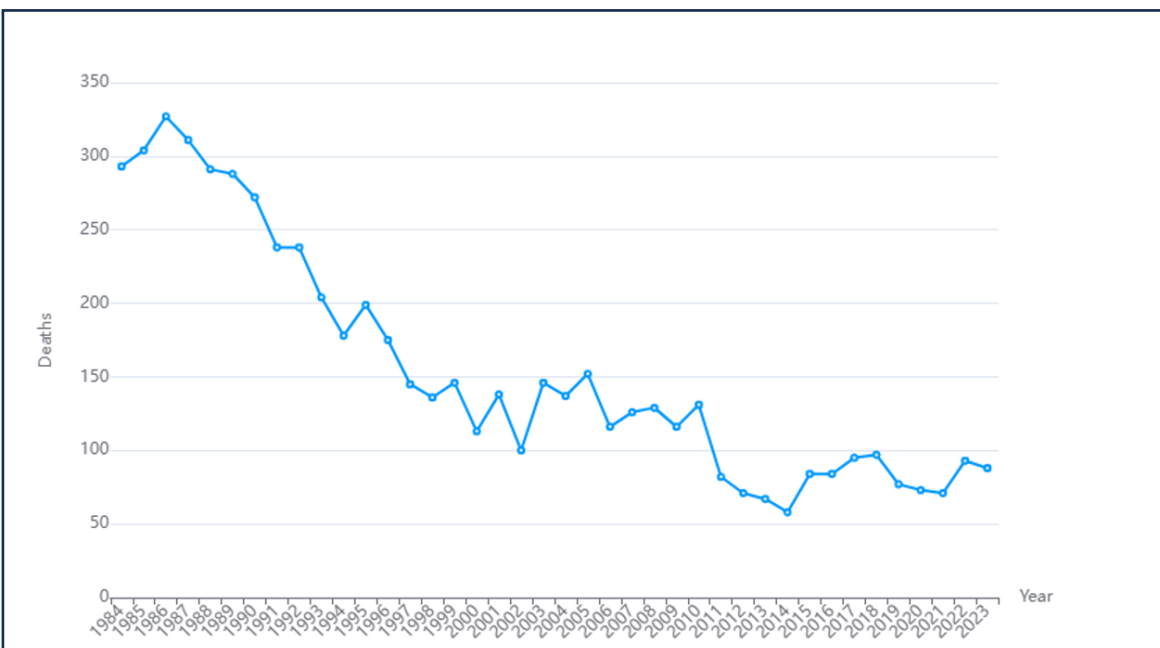


Figure 2: Deaths in crashes with young drivers at fault 1984 to 2023

Appendix B

Source: *Young Drivers, The Road to Safety*. OECD Transport Research Centre 2006

	A	B	C	D	C/D ^a
	Young Drivers	All Drivers	Young as % of all Driver Deaths	Young as % of Total Population	
Drivers Aged 16-24					
Canada	262	935	28.0	12.9	2.2
N. Zealand	51	205	24.9	12.9	1.9
USA	3 999	13 209	30.3	12.8	2.4
Drivers Aged 17-24					
Australia ^e	195	771	25.3	11.2	2.3
Austria	110	368	29.9	9.9	3.0
Great Britain	330	1 106	29.8	10.2	2.9
Iceland ^f	2.6	10.6	24.5	11.6	2.1
Ireland ^b	31	110	28.2	13.1	2.2
Drivers Aged 18-24					
Belgium ^c	154	617	25.0	8.6	2.9
Czech R.	90	495	18.2	9.9	1.8
Denmark	35	139	25.2	7.6	3.3
Finland	43	151	28.5	8.9	3.2
France	645	2 445	26.4	9.1	2.9
Germany	750	2 329	32.2	8.2	3.9
Greece ^d	105	549	19.1	10.2	1.9
Hungary ^c	53	397	13.4	10.3	1.3
Italy	n/a	n/a	n/a	n/a	n/a
Japan	326	1 519	21.5	8.3	2.6
Korea	128	939	13.6	11.0	1.2
Luxembourg	n/a	n/a	n/a	n/a	n/a
Mexico	n/a	n/a	n/a	n/a	n/a
Netherlands	74	269	27.5	8.3	3.3
Norway	25	119	21.0	8.4	2.5
Poland	313	1 441	21.7	12.0	1.8
Portugal ^b	80	393	20.4	10.0	2.0
Slovak Republic ^g	41	264	15.3	11.6	1.3
Spain	322	1 689	19.1	9.1	2.1
Sweden	40	198	20.2	8.1	2.5
Switzerland	49	165	29.7	8.3	2.6
Turkey	n/a	n/a	n/a	n/a	n/a

Source: OECD, IRTAD.

Note: a. This column shows the relationship between young drivers killed as a proportion of all drivers killed, and young people as a proportion of the total population in that country – in other words, column C divided by column D. Thus, for Canada, in 2004, the proportion of 16-24 year-old drivers killed per killed driver was 2.2 times greater than the proportion of 16-24 year-olds in the population.

b. Data from 2003.

c. Data from 2002.

d. Data from 2000.

e. Australian data provided by the Government of Australia.

f. Given Iceland's small population, an average of 2000-2004 data has been used for numbers of deaths.

g. Slovakian data provided by the Slovak Republic

Figure 1: *Young Driver and All Driver Deaths in OECD Countries 2004*

