



CONSULTATION FEEDBACK

Submission: Graduated Driver Licensing System: Requirements for supervised driving hours for time reduction

To: NZ Transport Agency Waka Kotahi
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About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) is a national membership association representing the road freight transport industry. Our 1,100 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 helps trucking operators drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

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).

la Ara Aotearoa Transporting New Zealand (Transporting New Zealand) feedback to NZTA on the proposed requirements for supervised learner licence driving hours.

1. Transporting New Zealand appreciates the opportunity to provide feedback to NZTA on how a supervised driving hours system for learners wishing to advance to their Restricted licence six months sooner should work.
2. Transporting New Zealand supported other reforms to the Graduated Driver Licensing system (GDLS), including;
 - i. setting the Learner and Restricted periods both at 12 months
 - ii. discontinuing the second practical test to advance to a Full licence
 - iii. halving the demerit threshold for learner and restricted licence holders
 - iv. a zero-tolerance clean driving record requirement in the restricted stage
 - v. a zero-alcohol limit for learner and restricted licence holders.
3. The success of the road freight industry is critically dependent on the competence and availability of appropriately licensed drivers. Obtaining a Class 1 car licence is the first step towards potentially entering the truck driving workforce, and therefore Transporting New Zealand's members have a strong interest in this issue.
4. In general, we agree with NZTA's proposals. However, we believe there should be some obligation for learners to experience driving in a range of conditions, in lieu of six months of extra time, before progressing to the Restricted test.
5. Specifically, we believe a portion of a learners' supervised driving hours should be at nighttime; and on roads with a speed limit of at least 80 km/h.
6. Transporting New Zealand also recommends NZTA give high priority to maintaining a good balance between system integrity, the degree of difficulty of the operational requirements and cost. Broadly we believe the current proposal does this, however we are mindful that other submitters may desire a system with much more discipline and rigor. Our concern is that if a good balance is not maintained and the barriers to compliance are perceived to be too onerous and/or too costly then this will stymie uptake.

Question 1: Do you support setting the required number of supervised driving hours at 60 hours?

7. We agree with setting the required number of supervised driving hours at 60, equating to on average, two and a half hours a week, and the maximum NZTA can mandate. We believe this strikes the right balance between ensuring an adequate amount of time is spent behind the wheel without being overly prescriptive.
8. We agree that the variable supervision option (number of hours dependent on the learner's driving experience) and the proportional offset option will be too complex to administer and for the public to understand.

9. However, we note our support for time spent with a professional driving instructor counting for a higher number of hours. For example, 60 hours with a non-professional supervisor could be equivalent to 30 hours with a professional instructor. This acknowledges the increased knowledge of road rules and the superior teaching ability that professionals hold.
 - i. Learner-driver supervisors can be anyone who holds a valid full licence and has so for at least two years and are most often parents or other relatives.
 - ii. [Recent research from the Automobile Association](#) has shown that a majority of drivers did not score more than 70% in a theoretical road rules test, with a 91.4% minimum score required to pass a learner's licence test. It can be reasonably deduced that most drivers are unfamiliar with at least some basic road rules, and that training received from a professional driving instructor will be of a better quality.

Question 2: Do you agree with the proposal to set a fixed approach to supervised driving hours with no additional mandatory conditions?

10. Should someone choose to undertake supervised driving hours in exchange for spending six fewer months on their Learners licence, there must be risk mitigation measures in place to ensure their competence and improve safety outcomes.
11. Therefore, Transporting New Zealand supports the structured supervision option, requiring learners to complete a set number of hours in specific driving conditions. This is in alignment with Australia's supervised driving hours regime, where 20 of the 120 mandated hours must be at nighttime.
12. A survey of 27 respondents in the road freight transport industry found that 96% agreed learners completing supervised driving hours should be required to undertake them in a range of conditions. From this survey, various conditions were identified as being necessary to experience to be a competent and safe unsupervised driver, including;
 - i. Night driving
 - ii. Adverse weather conditions including rain, fog, or on ice
 - iii. Busy urban areas with heavy traffic
 - iv. Open roads, rural roads, and motorways
 - v. Temporary speed limited areas such as roadworks or school zones
 - vi. Multi-lane roads
13. Though we agree that navigating these settings can be more difficult and hazardous for inexperienced drivers, we understand that enforcing multiple conditions for supervised driving hours risks making the regime overly prescriptive and inaccessible for many learners. For instance, it cannot be guaranteed that a learner will be able to drive in adverse weather conditions depending on the time of year and their locality. There will also be learners in rural areas with no city centres close by, and vice versa.

14. However, night driving and driving on roads with posted speed limits of 80 km/h or greater are both higher-risk driving environments and, unlike the other conditions identified, can be reasonably accessed by the majority of learners. Adverse weather, heavy urban traffic, and certain road types cannot be guaranteed due to geographic and seasonal differences. By contrast, opportunities to drive at night and on higher-speed roads exist across the country, making these conditions both practical and equitable requirements for supervised driving hours.
15. Driving at night is riskier for newly licensed young drivers, hence the rule for Restricted licence holders to only drive between 5am-10pm unsupervised. This timeframe still involves periods of darkness and reduced visibility, where specific skills and strategies need to be deployed to handle a car safely. That timeframe also encompasses the morning and afternoon peak traffic periods.
16. Similarly, higher speed areas are associated with higher crash risk. In both 2025 and 2024, 70% of deaths from crashes occurred on open roads with a posted speed limit 80km/h and above ([NZTA, 2026](#)). An AA study of 200 fatal crashes in 2024 found that young developing drivers were overrepresented in the most common crash types (light vehicles and single-vehicle run off road), and that these crashes mostly occurred on high-speed open roads ([AA, 2026](#)). These roads often had a mean operating speed much lower than the posted limit and a lack of centre or roadside barriers, requiring extra caution to navigate, especially for inexperienced drivers.
17. Therefore, we propose that the 60-hour supervised driving regime mandates that at least five of those hours are undertaken after dark, and five hours are undertaken on roads where the speed limit is at least 80km/h. Five hours per condition is a reasonable proportion comprising less than 10% each of the overall 60 hours required.
18. We acknowledge that imposing these extra conditions will carry an additional administrative burden for learners, supervisors, and for NZTA. However, we expect that this will be small, particularly in comparison to the human and economic burden of road crashes.
19. The road is the workplace of New Zealand's near 33,000 truck drivers, and therefore the transport industry that we represent has a vested interest in upholding a high standard of road safety. We believe the proposed requirements for five hours of night driving and five hours on roads posted at 80 km/h or above represent a practical middle ground between safety and accessibility. They ensure learners gain experience in two of the most consequential driving environments before accessing an earlier Restricted licence, without creating unnecessary barriers that could prevent otherwise capable drivers from participating in the structured supervision pathway.

Question 3: Do you agree with the information requirements for learner drivers and supervisors logging supervised driving hours?

20. We agree with the information requirements for logging supervised driving hours, with the addition of identifying any time spent driving at night and on roads where the speed limit is 80km/h or higher.

Question 4: Do you support the digital approach to logging supervised driving hours, hosting the digital logbook in an app?

- 21. Transporting New Zealand supports the optional digital approach to logging supervised driving hours and recognises the superior verifiability of this approach.
- 22. The paper-based pathway should still be available for those who prefer it, or do not have suitable devices to support the digital app.

Question 5: Do you support the validation requirements for logged supervised driving hours?

- 23. Transporting New Zealand supports the validation requirements for logged supervised driving hours. While it is still possible to falsify these records, we imagine that risk will be small, and there are few ways to capture this information more reliably without utilising technologies like road-facing and cabin-monitoring cameras.

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