

OC260055

5 March 2026

Tēnā koe

I refer to your email dated 4 February 2026, requesting the following under the Official Information Act 1982 (the Act):

“information relating to the proposed Graduated Driver Licensing System reforms that remove the post-restricted full licence practical test.

- 1. Any risk modelling, safety analysis, or evidence used to justify removing the post-restricted practical assessment.*
- 2. Evidence relied upon to support the assumption that time held and absence of enforcement action are reliable indicators of driving competence.*
- 3. Internal advice, briefings, emails, or memoranda that raised safety concerns or objections to removing the full licence practical test.*
- 4. Analysis of alternative options considered, including exposure-based progression, conditional licensing, or post-restricted assessment models, and the reasons these options were rejected.*
- 5. Any assessment of the impact of low traffic enforcement density, particularly in rural areas, on the effectiveness of progression based on a clean driving record.*
- 6. Any advice received from Waka Kotahi or external road safety experts regarding increased risk resulting from removal of the post-restricted verification step.”*

On 10 February 2026, we advised you that much of the information in scope of your request can be found in documents published on the Ministry of Transport’s website:

www.transport.govt.nz/area-of-interest/safety/driver-licensing-system.

These documents contain safety analysis, options analysis and evidence used during the decision-making process.

You reviewed the information and advised that it did not satisfy the request. You asked that we continue to process your original request including any internal advice, modelling, assessments or other information that informed the decisions.

There are six documents in scope of your request. Of these, four are released with some information withheld and two are refused in full as they are already publicly available. We note some of the timelines included in the older briefings are out of date and no longer applicable.

The document schedule in Annex 1 outlines how the documents have been treated under the Act. Certain information is withheld under the following sections of the Act:

- 9(2)(a) to protect the privacy of natural persons
- 9(2)(b)(ii) to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information
- 9(2)(f)(iv) to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials
- 18(d) the information requested is or will soon be publicly available

With regard to the information that has been withheld under section 9 of the Act, I am satisfied that the reasons for withholding the information at this time are not outweighed by public interest considerations that would make it desirable to make the information available.

If you would like to discuss this decision with us, please do not hesitate to contact us at OIA@transport.govt.nz.

You have the right to seek an investigation and review of this response by the Ombudsman, in accordance with section 28(3) of the Act. The relevant details can be found on the Ombudsman's website www.ombudsman.parliament.nz.

The Ministry publishes our Official Information Act responses and the information contained in our reply to you may be published on the Ministry's website. Before publishing we will remove any personal or identifiable information.

Nāku noa, nā



Joanna Heard
Manager, Safety

Annex 1: Document Schedule

| Doc # | Reference number | Date | Title of Document | Decision on request |
|-------|------------------|------------------|--|---|
| 1 | OC241344 | 13 December 2024 | Graduated Driver Licensing System Improvements | Released with some information withheld under sections 9(2)(a), 9(2)(b)(ii) and 9(2)(f)(iv). |
| 2 | N/A | 6 June 2025 | Safe System Solution's Feedback on the proposed changes to the Graduated Driver Licensing System | Released in full. |
| 3 | N/A | 9 June 2025 | ACRS Submission on proposed improvements to New Zealand's Graduated Driver Licensing System | Refused in full. The submission is available on the Australasian College of Road Safety's website: https://acrs.org.au/wp-content/uploads/ACRS-submission-on-improvements-to-NZ-GDLS.pdf |
| 4 | N/A | June 2025 | NZ Automobile Association submission on: Proposed improvements to NZ's Graduated Driver Licensing System | Refused in full. The submission is available on the AA's website: https://www.aa.co.nz/content/dam/nzaa/01-brand/governance---reporting/governance/government-submissions/2025/AA%20submission%20on%20driver%20licence%20changes%20FINAL.pdf |
| 5 | OC250480 | 25 June 2025 | Seeking Direction on Driver Licensing Changes Post Consultation | Released with some information withheld under sections 9(2)(a) and 9(2)(f)(iv). Annex 1 is refused under section 18(d) as the summary of submissions has been published on the Ministry's website: https://www.transport.govt.nz/assets/Uploads/Submission/Summary-of-Submissions.pdf |
| 6 | OC250585 | 30 July 2025 | Improvements to the Graduated Driver Licensing System – Post Consultation Policy Decisions | Released with some information withheld under sections 9(2)(a), 9(2)(b)(ii) and 9(2)(f)(iv). The attachment is refused under section 18(d) as the final Cabinet paper is available on the Ministry's website: https://www.transport.govt.nz/assets/Uploads/Paper/Cabinet-paper-Post-consultation-report-back-and-final-policy-decisions.pdf |



13 December 2024

OC241344

Hon Simeon Brown
Minister of Transport

Action required by:

ASAP

GRADUATED DRIVER LICENSING SYSTEM IMPROVEMENTS

Purpose

This paper presents two proposed packages of changes to the Graduated Driver Licensing System (GDLS) to seek your direction on which package, or combination, to include in your February 2025 Cabinet paper and consultation document.

Key points

- You are due to report back to Cabinet in February 2025 with options for improving the GDLS to make it cheaper and easier, and support drivers to have the skill sets to drive safely. The intention is to seek Cabinet's agreement to issue a consultation document on changes to the Land Transport (Driver Licensing) Rule 1999 (driver licensing rule).
- We are working to have a new driver licensing rule in place by November 2025 and for the NZ Transport Agency Waka Kotahi (NZTA) to implement the new GDLS by 1 July 2026.
- We developed two packages of proposed changes. This paper seeks your view on which package you would like to take to Cabinet or whether there are other packages or combinations of initiatives you would like us to consider.
- **Package 1:** This package aims to maintain safety outcomes by removing the full licence test and redistributing its components to other parts of the system. This package would include the following components:
 - replace the full licence test with computerised hazard perception testing during the learner stage to mitigate the loss of the full licence test
 - approve additional restricted licence training courses to increase the options for people who wish to reduce the length of this stage, including in-car training
 - revise requirements for vision testing to remove barriers to further digitalisation of the licensing system, including moving applications and theory testing online.

- **Package 2:** This package would expand on Package 1 by including additional complementary components to improve safety outcomes for young drivers (16-24 years). These components would include:
 - extending the learner license stage from 6 to 12 months
 - incentivising learners to log supervised driving hours and use online learning programmes by allowing them to reduce the length of the extended learner stage if they take advantage of this option (for example, Drive, the NZTA and ACC online learning programme)
 - changing the restricted stage to introduce a probationary approach to deter novice drivers from offending (i.e. requiring no infringements to be received for a specific length of time to move on to a full licence).
- A preliminary assessment is included in this briefing (see Annex 2) under four criteria: efficiency, accessibility, safety and implementation. Further assessment of the expected outcomes of both packages will be required as we prepare the Cabinet paper. We will also need to provide you with further advice on the rule changes that will need to be made, including an assessment of the statutory criteria under that Land Transport Act 1998 that you are required to consider when a new rule is made.
- Advancing either of these packages will also require decisions about testing for overseas licence conversions. Overseas drivers made up around 60 percent of full licence practical tests in 2024. There are options for overseas drivers which need to be considered further.
- Alongside changes to the driver licensing rule, we are also seeking your view on advancing legislative changes to extend the zero blood alcohol concentration (BAC) requirement to all drivers going through the GDLS and stronger penalties for people who commit offences in the learner and restricted stages of the GDLS. Either of these changes could be included in your February Cabinet paper or the Ministry's road safety penalties review next year.

Recommendations

We recommend you:

- 1 **indicate**, for your February 2025 Cabinet paper, your preference for proceeding with:
 - Package 1 (maintain safety outcomes) Yes / No
 - Package 2 (additional measures for young drivers) Yes / No
 - another combination of measures Yes / No

2 **indicate** your preference on whether the Ministry should advance legislative changes for a zero blood alcohol concentration (BAC) to apply to learner and restricted licence holders with a view to including the measure in: Yes / No

Either

- your February 2025 driver licensing Cabinet paper Yes / No

Or

- the Ministry’s road safety penalty work programme in 2025 Yes / No

3 **indicate** your preference on whether you would like the Ministry to consider higher GDLS penalties with a view to including the measure in: Yes / No

Either

- your February 2025 driver licensing Cabinet paper Yes / No

Or

- the Ministry’s road safety penalty work programme in 2025 Yes / No

4 **note** the Ministry plans to engage with the New Zealand Automobile Association, the Street Smart Charitable Trust, Greg Murphy, the Driving Change Network, and VTNZ while developing the February 2025 Cabinet paper.



Paul O’Connell
Deputy Chief Executive – Sector Strategy
12 / 12. / 2024

Hon Simeon Brown
Minister of Transport
..... / /

- Minister’s office to complete:**
- Approved Declined
 - Seen by Minister Not seen by Minister
 - Overtaken by events

Comments

Contacts

| Name | Telephone | First contact |
|---|-----------|---------------|
| Paul O'Connell, DCE – Sector Strategy | s 9(2)(a) | |
| John Edwards, Principal Adviser, Safety – Sector Strategy | | ✓ |
| Joanna Heard, Manager Safety- Sector Strategy | | |

RELEASED UNDER THE
OFFICIAL INFORMATION ACT 1982

GRADUATED DRIVER LICENSING SYSTEM IMPROVEMENTS

Background and context

- 1 The Ministry will provide you with a draft Cabinet paper and consultation document on changes to the GDLS in February 2025. This is in response to a Cabinet request [CBC-24-MIN-0016 of 15 April 2024] for you to report back on:
 - proposals to address cost under-recovery for driver licence fees, including whether further changes to overseas licence conversion fees are required
 - options on how to make getting a driver licence cheaper and easier, and support drivers to have the skill sets to drive safely.
- 2 On 17 October 2024, you also released New Zealand's Road Safety Objectives. This document included two GDLS actions:
 - identify opportunities to improve the GDLS taking into account road safety outcomes (for example, ensuring drivers are adequately trained), alongside making a licence cheaper and easier to obtain (MoT, ACC, and NZTA)
 - continue optimising engagement in evidential training and education programmes, such as the Ride Forever and Drive programme, and the development of new programmes (ACC and NZTA).
- 3 This paper proposes changes to the driver licensing rule in line with these objectives. The intention is to have a revised driver licensing rule in place by November 2025, with implementation by 1 July 2026.

New Zealand's GDLS is out of step with comparable jurisdictions

- 4 Under New Zealand's GDLS, applicants for Class 1 (car) licences are required to sit a theory test, practical restricted licence test, and practical full licence test. Progressing through the GDLS costs applicants a minimum of \$362.50 in fees (failing more than once will increase this cost). While this is cheaper than many overseas jurisdictions, the fees are not set to recover costs fully. Even at these levels, there is significant feedback about barriers to obtaining a licence (of which cost is one part).
- 5 Most comparable overseas jurisdictions do not require a second practical test (or 'full test' / 'exit test') to get a full licence.
- 6 Other jurisdictions often use a probationary approach where licence holders must maintain a clean driving record for a minimum time to be granted a full licence. These systems also require applicants to undertake computerised hazard perception testing at the end of their learner stage equivalents.

- 7 Many comparable jurisdictions require novice drivers to hold their learner and/or restricted licence equivalents longer than in New Zealand. They place additional requirements on novice drivers, such as mandated supervised practice hours. Some require private driver training, have stronger penalties for novice drivers and set zero blood alcohol concentration (BAC) limits on novice drivers of all ages.
- 8 Annex 1 compares New Zealand's GDLS with comparable overseas jurisdictions, including the Australian states of New South Wales and Queensland.

IMPROVING THE GDLS

We have developed two potential change packages

- 9 To meet Cabinet's objectives, we developed two packages of driver licensing changes. We seek your view on which package you would like to include in your February 2025 Cabinet paper and consultation document.
- 10 This review focuses only on changes to the Class 1 (car) licensing process that can be made by amending the driver licensing rule. Constraining the scope will enable NZTA to implement the rule changes by 1 July 2026.

Package 1: maintain safety outcomes

- 11 Package 1 would remove the full licence test with mitigations to ensure safety outcomes are still met. This package would:
 - retain hazard perception testing (delivered through computerised testing) and move the test to the learner stage to mitigate the loss of the full licence test
 - approve additional restricted licence courses to increase the options for people who wish to reduce the length of this stage, including in-car training, and improve NZTA's ability to have oversight of course providers
 - revise requirements for vision testing to remove barriers to further digitalisation of the licensing system.
- 12 Implementing Package 1 will require rule changes, including changing vision testing requirements to enable online application and theory testing to be implemented. We are considering further how to revise the vision testing requirements to support further digitisation.

Package 2: additional measures for young drivers

- 13 Package 2 would include the items in Package 1 plus additional measures to improve outcomes for young drivers. We think these measures are complementary and would work better as a package. For example, we do not recommend creating incentives to shorten the learner stage unless the standard learner period is extended to 12 months. Additionally, we advise against allowing a learner period of less than six months

14 The additional measures proposed are:

- extending the learner stage from six to 12 months
- incentivising logging supervised driving hours by allowing new drivers to reduce the time spent on the learner stage if they log practice hours (for example, 80-120 hours)
- incentivising the use of approved online learning programmes by allowing new drivers to reduce the time spent on the learner stage if they take up this training option
- changing the restricted stage to introduce a probationary approach (i.e. no infringements would be required for a specified time to move on to a full licence).

Package 2 is expected to improve safety outcomes for novice drivers

- 15 Package 2 is expected to improve safety outcomes for novice drivers regardless of whether they take up the incentives. Evidence suggests that supervised practice produces safer drivers, and online theory training has been shown to produce good results because it explains the reasons for road rules.
- 16 Evidence suggests that the crash risk decreases when individuals are supervised whilst driving for a longer duration or obtain their licenses at an older age¹. Drivers who decide not to take up the incentives would be on a learner licence for 12 months. This extended learner period will likely improve their safety outcomes, provided they use the time to undertake additional supervised practice.
- 17 Such interventions could improve safety outcomes for young drivers. Still, they would need to be weighed against possible increased time and costs for them to gain their full licence.

Assessment of packages

- 18 We have developed criteria to undertake a preliminary assessment of the two packages and propose to use these criteria as we develop the February Cabinet paper (see Annex 2). The following criteria focus on establishing how the packages would achieve Cabinet's objectives:
- safety — safety outcomes for people progressing through Class 1 (car) licensing processes are maintained or enhanced
 - efficiency — increases the delivery efficiency of the GDLS
 - accessibility — impact on accessibility into, and through, the GDLS, e.g. for rural areas or disadvantaged groups
 - implementation — changes can be implemented in a cost effective way by 1 July 2026.

¹ Novice Driving in New Zealand, *Centre for Automotive Safety Research*, July 2024, p 1

- 19 The preliminary assessment will be developed further for the February Cabinet paper. For rule changes, there will also be an assessment against the statutory criteria that you will need to consider under the Land Transport Act 1998 when the rule is made. These criteria include safety, security, economic development, environmental sustainability, international obligations and implementation costs.

Previous Ministry advice on the full driver license

- 20 In April 2022, the Ministry recommended to the then Minister of Transport that the 'full test' be retained. Limited analysis of crash data informed this advice.
- 21 The 2022 analysis found that drivers who did not progress to a full licence had higher odds of a DSI crash. As part of your February paper, we will explore this data further.
- 22 Our proposed packages of changes also work to mitigate any potential consequences of removing the full test by redistributing its key components, and in the case of package two, introducing more stringent requirements.

Decisions on testing overseas drivers

- 23 Overseas drivers need to complete the full test to convert to a New Zealand driver licence. Decisions need to be made on what testing process these drivers will follow.
- 24 Potential options for overseas drivers include:
- maintain the full test only for overseas driver conversions
 - require overseas drivers to sit the restricted test
 - place them on a probationary period before converting to a New Zealand licence.
- 25 We will report back to you as part of developing the consultation document with further analysis of the options.

Implementation by 1 July 2026

- 26 The driver licensing rule gives the Director of Land Transport broad powers to determine the tests required at each stage of the GDLS. It also allows significant scope to determine how testing is delivered. Depending on your preferences, we will work with NZTA to determine what changes are required to the rule and what we may be able to achieve through operational changes.
- 27 The extent of changes to the NZTA system will vary based on the chosen package. However, NZTA considers that either package can be implemented by 1 July 2026.

28

s 9(2)(b)(ii)

Standalone legislative changes

- 29 Alongside the rule changes, we also recommend exploring two other measures where some other jurisdictions take a different approach – zero BAC and higher penalties for drivers in the learner and restricted stages. These initiatives would require legislative change.
- 30 In New Zealand, the BAC limit for drivers younger than 20 is zero, which applies to younger drivers going through the GDLS. However, older drivers going through the GDLS are subject to the usual blood alcohol limits. There is evidence that even small amounts of alcohol result in increased crash risk. A zero-BAC limit for learner and restricted licence holders of any age could effectively reduce crash risk for novice drivers as they learn to drive²
- 31 These measures could be progressed through your February Cabinet paper or the Ministry's road safety penalties work programme.

Work on cost recovery is progressing in parallel with the work on GDLS improvements

- 32 Cabinet has also invited you to report back with proposals to address cost under-recovery for driver licence fees, including whether further changes to overseas licence conversion fees are required. NZTA sought your direction on the preferred approach to addressing regulatory service cost under-recovery issues (including for driver licensing services) on 1 November 2024 [BRI-3219 refers].
- 33 NZTA has advised that it proposes to do the work in three phases:
- Phase 1 (until December 2024) - confirming a funding review with you
 - Phase 2 (January 2025 to November 2025) - working with you to agree policy proposals ready for consultation
 - Phase 3 (December 2025 to May 2026) - seeking your and Cabinet's approval for changes to fee regulations
 - Implementation (1 July 2026).

² Novice Driving in New Zealand, p 14

- 34 The Ministry will work closely with NZTA to ensure that this work gives effect to the decisions made to improve the GDLS and enable its more efficient delivery.

Next steps

- 35 We will reflect your decisions in a draft Cabinet paper and discussion document (although we are continuing to develop the paper in the meantime). We plan to provide you with a first draft on Thursday 13 February 2025, aiming for the 26 February 2025 meeting of Economic Development Committee (subject to confirmation of Cabinet Committee timetables for 2025).
- 36 We also plan to engage with the New Zealand Automobile Association (AA), Driving Change Network, VTNZ, Street Smart Charitable Trust, and Greg Murphy before providing you with a draft of the February 2025 Cabinet paper. This would allow us to test our proposals before the formal consultation stage of this process and identify potential areas of concern with stakeholders.
- 37 We will also start engaging with interested government departments as soon as possible because we expect high interest in the proposals.
- 38 The following timeline includes a detailed timeline up until the February package (subject to confirmation of 2025 Cabinet timetables) and an overview of the timeline beyond February 2025:

| Action | Date |
|---|---|
| Briefing on package options (this briefing) | Fri 13 December 2024 |
| Minister provided the first version of Cabinet paper and cover briefing | Thurs 6 February 2025 |
| Departmental and Ministerial consultation | Mon 10 February 2025 – Mon 17 February 2025 |
| Minister provided the final version of Cabinet paper and cover briefing | Wed 19 February 2025 |
| Lodgement | Thurs 20 February 2025 |
| ECO Meeting | Wed 26 February 2025 |
| Cabinet | Mon 3 March 2025 |
| Consultation on GDLS changes | Tue 4 March 2025-mid April 2025 |
| Cabinet confirmation of package | End May |
| Rule change drafted | End May to end July |
| Rule confirmed by Cabinet | End August |
| Rule in force | End November |
| Implementation of new GDLS | 1 July 2026 |

ANNEX 1: NEW ZEALAND COMPARED TO OTHER INTERNATIONAL JURISDICTIONS

| | Learner stage | | | | | Restricted (equivalent) stage | | | Overall (all stages) | | |
|----------------------------|---------------|--|--|--------------------------------|--|------------------------------------|--|---|--|---------------------|-------------------------|
| | Min. age | Min. Holding period | Min. practice requirements | Supervisor requirement | Exit test | Min. age | Min. holding period | Exit test | Demerit threshold | BAC limit | Min. cost (NZD approx.) |
| New Zealand | 16 | 6 months | None | Held full licence for 2 years | Practical test | 16.5 | U25: 18 months (12 with advanced driving course) 25+: 6 months (3 with advanced driving course) | Practical test including on-road hazard perception test | 100% in 2 years | U20: 0 20+: 0.05 | \$362.50 |
| Queensland, Australia | 16 | 1 year | U25: 100 hours including at least 10 at night 25+: none | Held full licence for 1 year | Computerised hazard perception test and practical test | P1 licence = 17 P2 licence = 18 | P1 licence: 1 year P2 licence: 2 years (1 year if 23+) 24+: none | None | Learner: 33% P1/P2 licence: 41% | 0 | \$559.07 |
| New South Wales, Australia | 16 | 1 year, unless age 25+ then can pass computerised hazard perception test early to get P1 | U25: 120 hours including at least 20 at night 25+: none | Holds full licence | Computerised hazard perception test and practical test | P1 = 17 P2 = 18 | P1 licence: 1 year P2 licence: 2 years | None | Learner and P1 licence: 33% P2 licence: 58% (Any speed offence results in licence suspension) | 0 | \$501.60 |
| Japan | 18 | 6 months from learners to full, or redo learner process | Theory test and practical test (min. 5 practical sessions in 3 months prior to test) | Held full licence for one year | One day course including theory test and practical test | 18.5 | n/a | None | 100% in 3 years | 0 | \$229.42 |
| Republic of Ireland | 17 | 6 months | 12 x 1 hour sessions with a driving instructor | Held full licence for 2 years | Practical test | 17.5 | 2 years | None | 7 out of 12 (58.3%) | 0.02 | \$1,202.31 |
| Sweden | 16 | Until at least age 18 and all tests passed | 3 hours of risk training theory and 3-4 hours of practical lessons | Authorised instructors only | Theory test and practical test | 18 | 2 years | None | No demerit scheme but if disqualified during first 2 years must reapply for learner licence | 0.02 | \$628.00 |
| United Kingdom | 15.75 | Until at least age 18 and all tests passed | None | Held full licence for 3 years | Theory test, computerised hazard perception test, and practical test | 18 | 2 years | None | 6 out of 12 (50%) in learner stage If exceeded, revert to learner stage | 0.02 | \$255.15 |

ANNEX 2: PRELIMINARY SUMMARY ASSESSMENT OF GDLS CHANGE PACKAGES

| Description | Safety | Efficiency | Accessibility | Implementation |
|---|--|---|---|--|
| <p>Package 1: Maintain safety outcomes</p> <ul style="list-style-type: none"> replace the full licence test with computerised hazard perception testing during the learner stage to mitigate the loss of the full licence test approve additional restricted licence training courses to increase the options for people who wish to reduce the length of this stage, including in-car training revise requirements for vision testing to remove barriers to further digitalisation of the licensing system, such as online applications and theory testing | <p>This option is expected to maintain safety outcomes by moving the hazard perception test from the full licence test during the learner stage.</p> <p>Further work is required to confirm that this change will balance or outweigh the removal of the full licence test.</p> | <p>This would improve the efficiency of delivery by removing the full licence test and introducing a computerised hazard perception test.</p> <p>This would support digitalisation in the future, leading to further efficiencies.</p> | <p>The system would be more accessible for novice drivers to progress through the system because there would be less practical testing.</p> <p>We expect this will make progress through the GDLS cheaper overall.</p> | <p>Digital system change would be required to be implemented by 1 July 2026 (the cost to implement will be addressed through the Regulatory Fees Review).</p> <p>Changes to the Land Transport (Driver Licensing) Rule 1999 would be required.</p> |
| <p>Package 2: Additional measures for young drivers</p> <ul style="list-style-type: none"> Package 1 a 12 month learner stage incentivise learners to log supervised driving hours and use approved online learning programmes by allowing them to reduce the length of the extended stage if they take advantage of these options replace the restricted stage with a probationary stage to deter novice drivers from offending (i.e. requiring no infringements to be received within the stage to move on to a full licence) | <p>This package would improve safety outcomes for novice drivers who take up the incentives for logging supervised hours and online learning because they would be better prepared.</p> <p>Drivers who decide not to take up the incentives would be on a learner licence for 12 months. Their safety outcomes are also likely to improve because of the longer 12 month learner period (provided they used the time to undertake more supervised practice).</p> | <p>This package would improve the efficiency of delivery by removing the full licence test and introducing a computerised hazard perception test. It would also support digitalisation in the future, leading to further efficiencies.</p> <p>Introducing an incentive system would increase the complexity of administering the GDLS.</p> <p>Further work is required to determine the cost of administering the online course, which may depend on who delivers the course (NZTA or a third party).</p> | <p>Access would be improved by offering increased online services and removing the full test costs.</p> <p>For people who take up the available time discounts and do not offend, the system should be both cheaper and easier to use (even if there needs to be a fee for using online training).</p> <p>Utilising the incentives will mean drivers are in the system for the same time as the status quo (with the restricted stage discount, a full licence can be obtained in 18 months).</p> <p>People who do not take up the options for time discounts could be in the system for a maximum of 30 months (6 months more than the status quo of 24 months).</p> <p>If these drivers offend during the probationary period, they will be in the system for a longer period before they get a full licence.</p> | <p>Digital system change would be required to be implemented by 1 July 2026 (the cost to implement will be addressed through the Regulatory Fees Review).</p> <p>Changes to the Land Transport (Driver Licensing) Rule 1999 would be required.</p> |

6 June 2025

Te Manatū Waka – the Ministry of Transport
Proposed changes to the Graduated Driver Licensing System

By email: GDLS@transport.govt.nz

RE: Safe System Solutions' Feedback on the *Proposed changes to the Graduated Driver Licensing System*

Safe System Solutions (SSS) welcomes this opportunity to provide feedback to the Ministry of Transport on the Proposed changes to New Zealand's Graduated Driver Licensing System (GDLS).

SSS is a world leader in applied road safety consulting ranging from strategy, policy and planning to detailed design of road safety infrastructure. Our focus is on practical, evidence-based solutions using the best research from around the world. Our clients are governments and companies throughout Australia, New Zealand, Asia, the USA and Canada with the long-term objective of eliminating death and serious injury in road use.

Since its foundation in 2013, SSS has specialised in assisting national, state and local governments to develop professional skills and knowledge to assure the safety benefits of their road safety policies and investments. In 2023, SSS opened its New Zealand office to provide dedicated local service backed by SSS international expertise.

SSS welcomes improvements to the GDLS to improve safety and enable social and economic outcomes. We support aspects of the proposed changes but have significant safety concerns if the preferred Option 3 is taken (unless wider evidence-based safety measures are adopted). We also have concerns about unintended negative consequences for young people, Māori and other road users, with implications for equity, social and economic outcomes.

Young people are significantly over-represented in deaths and serious injuries in New Zealand. While young people, aged 15-29 years, only make up 19.4% of the population, young drivers account for 36% of car driver related death and serious injuries (DSI) nationally. There is also a relationship between young driver DSI and social deprivation index, and this is a particular issue for Māori.

SSS believes that safety should be a priority when making changes to the transport system. Changes to the GDLS should be evidence-based and implemented as part of a connected system to reduce DSI.

Please contact **Dr Amy Williamson**, Technical Lead – Safe People, Amy.Williamson@SafeSystemSolutions.co.nz if you have any queries regarding the SSS submission.

Regards



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The SSS feedback is summarised as:

| | |
|---|---|
| <p>Proposal 1: Remove the full test with the proposed safety mitigations</p> | <p>Opposed: SSS does not support removing the full licence test unless additional safety measures are introduced, including:</p> <ul style="list-style-type: none"> • Mandatory minimum 60 supervised driving hours at the learner stage for those under 25 years (to increase over time in line with best practice), including conditions such as night-time driving. • Extended minimum learner period to 12 months. • Mandatory hazard perception testing at the end of the learner stage (which could be computerised). • Additional support for those who experience barriers to progression including at the learner stage. • A strengthened restricted licence test to cover the diversity of skills covered by mandated hours during the learner period • An independent evaluation conducted after 3-5 years. |
| <p>Proposal 2: Introduce a clean driving zero tolerance policy in the restricted stage</p> | <p>Conditionally opposed: A zero-tolerance policy for all traffic offences could result in many novice drivers taking longer to obtain their full licence. An effective demerit point system should be introduced to encourage compliance, with a focus on high-risk behaviours to deter repeat offending and improve safety, and with tailored solutions for recidivists. Other incentive based options could be considered such as the good behaviour bond and a free three-year licence.</p> |
| <p>Proposal 3: Halve the demerit threshold for learner and restricted licence holders</p> | <p>Support with conditions: Halving the demerit threshold could improve compliance with high-risk offences including among repeat offenders. However, this would be dependent on wider changes being made to the demerit system to ensure alignment with risk to improve safety and prevent negative unintended consequences.</p> |
| <p>Proposal 4: Introduce a zero-alcohol tolerance for all novice drivers</p> | <p>Strongly support: SSS strongly supports a zero-alcohol limit for all learner and restricted licence holders. This aligns with best practice and supports safety outcomes for young and novice drivers.</p> |
| <p>Proposal 5: Increase NZTA oversight</p> | <p>Support: Improved oversight by NZTA will ensure consistency and maintain programme quality and equity outcomes.</p> |
| <p>Proposal 6: Reduce eyesight testing requirements</p> | <p>Partially support: SSS supports reduced requirements to streamline processes, but any changes should be made upon expert advice from the NZ Association of Optometrists.</p> |

The detailed SSS feedback is presented below in relation to the consultation questions.

Question 1: Do you support removing the full licence test with the proposed safety mitigations?

SSS Position: Opposed

SSS does not believe that the proposed mitigations will maintain safety. It may, in fact, have a significant negative impact on safety outcomes for novice drivers and other road users. This could also worsen existing inequitable safety outcomes for young people, Māori and those in high decile social deprivation locations who are already over-represented in DSIs in New Zealand.

SSS does not support removing the full licence test unless the following measures are introduced:

- Mandatory minimum 60 supervised hours at the learner stage for those under 25 years (with a view to increase those hours over time in line with best practice – up to between 80-120), including under complex conditions such as night-time driving.
- Extended minimum learner period to 12 months.
- Mandatory hazard perception testing at the end of the learner stage (which could be computerised as is implemented across Australia).
- Additional funding support provided for those who experience barriers to progression including at the learner stage.
- A strengthened restricted test to cover the diversity of driving skills covered by the mandated hours during the learner period.
- An independent evaluation conducted after 3-5 years to assess the impact of the changes and inform further targeted changes in line with best practice.

Rationale and evidence

Among countries with developed GDLS, New Zealand holds the second highest youth-fatality rate for drivers and car occupants, following only the United States (Thomas et al., 2024). New Zealand was the leader in driver licensing reform as the first country to introduce a GDLS. This review process is an opportunity for New Zealand to adopt advancements in international best practice that have proven effective, including across Australia, and lift safety performance for novice drivers.

The consultation documents note that other jurisdictions with a GDLS do not have a full test and more restrictions on novice drivers. They do however have several other conditions and requirements in place to ensure the safety of novice drivers throughout the GDLS:

- A longer minimum learner period (12 months compared to 6 months in New Zealand)
- 120 mandatory supervised driving hours for learners (currently not required in New Zealand)
- A longer minimum holding period for a restricted licence (up to 3 years compared to 12-18 months in New Zealand)
- A computerized hazard perception test (from learner to restricted) (currently tested as part of the full test in New Zealand)
- A higher minimum full licence age (20 years in most states compared to 17.5 in New Zealand if a defensive driving course is completed).

Other jurisdictions who do not have a GDLS such as the UK also have much stricter requirements than New Zealand. There are also differences in testing requirements before moving onto a restricted licence, with the assessment in Australia covering the diversity of skills mandated through supervised hours (and some states also have a Competency Based Training and Assessment option). Australia has also provided the best evidence of targeted changes to improve progression through the GDLS, providing investment and support for disadvantaged learner drivers (Thomas et al., 2024). Learner Driver Access Programs and Learner Driver Mentor Programs are available in most Australian jurisdictions (Wundersitz et al., 2024).

Recent research from Queensland has shown that these learner driver mentor programs (LDMPs; equivalent to the community driver mentor programs in New Zealand) offer wider safety benefits during the learner and restricted stages. Program participants, in a state-wide Queensland based LDMP, were found to be safer drivers during their provisional phases when compared to matched sample of novice drivers without mentor program experience (Schoots et al., 2022; Smyth & Sheehan, 2016). A learner driver mentor program administered by Police Citizens Youth Clubs across Queensland has been shown to foster more positive perceptions of police and reduce self-reported risky driving behaviours among disadvantaged participants that had greater satisfaction with driving mentors in the program (Schoots, 2024). Mentor satisfaction was important in shaping perceptions of procedural justice, which may, in turn, contribute to improved road safety outcomes. These findings suggested that quality relationships with driving mentors can positively influence risky driving outcomes and perceptions of authority figures, which is particularly significant for disadvantaged youth (Personal Communication, 2025).

These differences mean that compared to Australia, New Zealand has fewer competency conditions and requirements before driving solo and then unrestricted, novice drivers are less mature cognitively when they obtain their full licence which is significant for novice driver crash risk, and less funding and resourcing to support disadvantaged novice drivers. New Zealand also has fewer alternative transport options which impacts people's reliance on motor vehicle travel and driver licensing.

If the full licence test is removed, more needs to be done to ensure that novice drivers have the right level (and access) of training and supervision at the learner stage, and robust assessment requirements in place before progressing to a restricted and full licence. This is especially important given the relatively short, restricted licence holding period and low minimum full licence age in New Zealand. This cognitive maturity has a significant impact on crash risk (Wundersitz et al., 2024).

In New Zealand, 23% of young drivers fail their full test (with overseas conversions removed). This indicates that one in four restricted licence holders are not meeting the required standard for unrestricted driving. If the test is removed, these novice drivers will obtain a full licence before they are ready, putting themselves and other road users at risk.

The policy would also mean that a restricted licence holder could obtain their full licence with little or no experience on a restricted licence. A person could gain their restricted, go overseas for 18 months, and then return to New Zealand and be automatically issued a full licence. While the restricted test will pick up *critical errors*, there is variation in test routes, and it does not necessarily assess the complexity of skills required before driving solo and then unrestricted. Passing this test and then potentially having very little or no experience driving on a restricted licence is a particular concern.

Removing the full test with the goal of making it easier to get a full licence, also does not address the significant barriers that people are currently experiencing at the learner stage. Unless the structural barriers are addressed and support provided during the learner period, many novices will remain stuck on their learner licence and not obtain their full licence. These challenges require increased resourcing to provide intensive support solutions including direct funding (Thomas et al., 2024).

Introducing tougher restrictions as a mitigation for removing the full test will not ensure safety outcomes. For the reasons explained, being fully compliant does not equate to being a safe and competent driver. The proposed mitigations could also lead to negative unintended consequences

including making it harder for some people to get a full licence and increase licence suspensions and unlicensed driving.¹ These potential impacts are discussed further under Question 2 and 3.

There is clear evidence supporting the GDLS components that Australia and other jurisdictions have implemented over time (Turner et al., 2021). The most well evaluated components include a minimum learner period of 12 months, a minimum provisional age greater than 16 with increasing benefits with increasing age, a zero BAC limit, and restrictions on night driving and peer passengers. There is also evidence to show that minimum supervised hours increase practice time, more hours associated with improved crash outcomes, and optimal experience being 80-100 to a maximum of 120 hours (Wundersitz et al., 2024).

Research confirms that compliance with mandated supervised hours is generally high once they are introduced. The Victorian evaluation showed that average practice hours increased over time, and a decrease in crash involvement rates for learners observed. Statistical comparisons confirm that the GDLS practice and learner permit holding requirements have been successful in increasing levels of practice among learner drivers, particularly those aged 16 and 17. Significant efforts in public promotion of practice hours to bring the community along on the journey and gain their acceptance has assisted in the steady progression over time (Healy et al., 2017). An evaluation of changes to the Tasmanian GDLS showed that changes to the learner and provisional licence were generally perceived more favourably at follow-up by young people and parents, including the increase to 80 hours from 50 hours of supervised driving practice (Watson-Brown et al., 2024).

Research also confirms high levels of accuracy with logbook recordings and that most learners do aim to meet the minimum supervision requirement (Austroads, 2015). This is achieved through checking mechanisms, provision of an app-based option, and community promotion. There is also a process for an exemption from the minimum hour requirement for exceptional circumstances, but the practical test must still be passed to obtain a licence.²

Other jurisdictions have ensured that their driving tests are calibrated to meet the mandated hours to ensure applicants have gained the required experience before passing the test (Catchpole et al., 2008).

The removal of the full test and proposed safety mitigations must be considered in the wider context of evidence and best practice. Without the wider measures recommended above, this proposal could lead to novice drivers gaining their full licence before they are ready, to the detriment of safety outcomes, increasing safety and wider inequities, and social costs.

¹ Research shows that unlicensed driving increases crash risk by at least 3 times

<https://eprints.qut.edu.au/7002/1/7002.pdf>.

² <https://www.service.transport.qld.gov.au/requestlogbookexemption/public/Welcome.xhtml?dswid=8805>

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

SSS Position: Conditionally opposed

SSS supports a move towards a more effective risk-based and equitable penalty system for all road users, including special licence conditions for novice drivers that support safety outcomes.

SSS supports this including staged penalties such as licence suspension for subsequent offences, options for immediate licence suspension, and specific sanctions and/or licence bans for high-risk offences, with alternative pathways for repeat offenders including those experiencing substance use.

SSS does not support a zero-tolerance clean driving record for all traffic offences requiring a restart to the beginning of the restricted period. SSS supports the consideration of other incentive-based options such as the good behaviour bond and a free three-year licence scheme as implemented in Victoria.³ Research has been conducted for Waka Kotahi NZTA on the use of different incentives to encourage safer driving behaviour.⁴

Rationale and evidence:

As noted under Question 1, being compliant does not necessarily mean that novices are driving safely. They require the right level of skill development, hours of experience and cognitive maturity, as demonstrated by the evidence. For this reason, SSS does not support a zero-tolerance clean driving record as a safety mitigation for removing the full test.

Introducing specific conditions or good behaviour requirements for novice drivers could support safety outcomes if they focus on the offences that contribute most to harm. Evidence shows that a small number of offences contribute significantly to DSIs – impairment, speeding, restraints and distraction. Young drivers are over-represented in DSIs nationally relating to high-risk behaviours including speeding, drink driving and distraction.⁵

A zero-tolerance clean driving record policy for all traffic offences does not have the same safety focus and could make it harder for many people to get their full licence, with negative impacts on safety and equity. A significant number of people in New Zealand experience barriers to compliance with licence conditions and the proposed policy could make it slow and overly difficult to progress. People who are disadvantaged and do not, for example, have the same level of access to supervision and education could also be more likely to make an error and then have to restart to the beginning. Evidence shows that drivers who progress through the licensing system at a relatively normal pace, from learner through to full licence, are significantly less likely to be involved in a crash (Schiff Consulting, 2019).

Unless these structural inequities and compliance barriers are addressed, this policy could make it more difficult to get a full licence and therefore not achieve the overall policy objective. Additional investment is needed to support people who are disadvantaged to meet compliance with licence conditions and progress through the GDLS, including at the learner stage.

In general, having to restart could also cause frustration, avoidance, and create a negative learning experience for many people. For those experiencing compliance barriers to licensing, this could lead to a “give up” mentality. A zero-tolerance policy also doesn’t account for novice drivers making a

³ <https://transport.vic.gov.au/registration-and-licensing/licences/probationary-licence/free-drivers-licence-scheme>

⁴ <https://www.nzta.govt.nz/resources/research/reports/706>

⁵ While only 19.4% of the population are 15-29 years, 37% of DSIs related to distracted drivers recorded in CAS were young drivers, 48% of DSIs related to speeding drivers were young drivers, and 46% of DSIs related to drink drivers were young drivers.

mistake as they are learning, which could be disempowering. A fundamental principle of the Safe System approach is that people make mistakes, and this shouldn't exclude novice drivers especially as they are still learning. Australia requires probationary drivers to display "P plates" to assist the public in acknowledging novice drivers as well as the enforcement of probationary licence conditions (Bates, Rodwell & Matthews, 2019).

It is also important to note that enforcement-focused policies can contribute to cycles of non-compliance and unlicensed driving among Māori and low-income populations. This reinforces existing inequities and may also contribute to poorer long-term safety outcomes. Research acknowledges the importance of having effective penalties in place to support safety outcomes, but highlights these equity concerns, emphasising the need for more equitable and community-responsive alternatives to fines and penalties, including education-based and rehabilitative pathways (MRCagney, 2022).

Focusing these conditions or requirements on high-risk offences is more justified because of their contribution to DSIs and the over-representation of young drivers in those crashes.

Evidence for good behaviour periods with regression to previous licence stages is scant. While there are limited evaluations of the effectiveness of specific GDLS sanctions, there is clearer evidence and justification for these other measures, and they are more widely applied across Australia and in several other countries (Austroads, 2015). These are typically demerit-based with lower suspension thresholds for novice drivers, meaning licence suspension for a second offence in some cases and immediate suspension in some cases.⁶ Victoria has a good driving policy, but this is defined quite differently to what is being proposed in New Zealand.⁷

If a good driving policy is developed, SSS strongly recommends that the Ministry discuss this with transport authorities in Australia to understand the nuances and complexities involved. For example, the probationary period in Victoria will not be extended if the licence ban was due to a demerit point ban. This is because usually the offences are not as serious as an outright ban from speeding, drink-driving or drug driving. Some states may also revert the licence if the person has progressed to the next stage of licensing before the offence/ban could be applied. SSS can provide the Ministry with contacts from transport authorities across Australia.

Licence bans in general have been shown to be highly effective at reducing drink driving and speeding offences, reoffending and casualty crashes, and there is research to inform the optimal length of licence bans (Imberger et al., 2019). The good behaviour bond is an incentive-based option used across Australia and has also been shown to be an effective behaviour change measure.

These demerit-related penalties should be supported by other options or alternative pathways for those who require support for unlicensed driving or substance use. High-risk repeat offending can be more complex and require more tailored solutions, such as alcohol interlocks and rehabilitative intervention (Sakashita et al., 2021; Thomas et al., 2022).

⁶ In NSW provisional drivers who speed by more than 30km/h over the limit face immediate licence suspension and licence confiscation by police, P1 drivers caught speeding will exceed their demerit point limit and lose their licence for at least 3 months, P2 drivers will lose their licence for at least 3 months if they're penalized twice for speeding. For drink driving, novice drivers can immediately lose their licence for 3 months.

<https://www.transport.nsw.gov.au/roadsafety/young-drivers/provisional>

⁷ A good driving record means your licence has not been cancelled or suspended and you have not had any drink and/or drug driving offences. If your licence is cancelled, you will need to start your probationary period again. Your licence may also be suspended if you get too many demerit points – probationary drivers have a stricter limit than other drivers. <https://transport.vic.gov.au/registration-and-licensing/licences/driver-history-handbooks-and-logbooks/driver-handbooks-and-logbooks>.

A zero-tolerance clean driving policy would also need to be enforced and therefore align with the strategic and operational priorities of NZ Police. Research has highlighted challenges with the enforcement of GDLS conditions and the effect of enforcement of traffic laws for provisional drivers is nuanced including with the requirement to display P Plates (Bates et al., 2016).

A zero-tolerance policy for all traffic offending could result in many novice drivers taking longer to obtain their full licence. Licence conditions for novice drivers should focus on high-risk offences that contribute to harm. There is an opportunity to introduce an effective demerit system to encourage safe driving and deter repeat offending, with more tailored solutions for recidivists. Other incentive-based options could be considered such as the good behaviour bond and a free three-year licence.

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

SSS Position: Support with conditions

SSS supports halving the demerit threshold for novice drivers if wider changes are made across the demerit and wider penalty system. This should include ensuring demerit points are proportionate to risk to support effective staged penalty or licence ban options noted under Question 2 and minimise the unintended negative impacts highlighted under Question 1.

Rationale and evidence:

As noted under Question 2, SSS supports a move towards a more effective risk-based and equitable penalty system for all road users. This should include ensuring that demerits (and financial penalties) are proportionate to the level of risk. This is important for sending the right message to the public about the level of risk and thereby supporting deterrence goals for all drivers, including novices.

A lower demerit point threshold for novice drivers is regarded as effective. However, penalties are currently inconsistent and disproportionate to risk in New Zealand, including across the demerit system which makes this problematic. The offence for failing to display L plates is 25 demerits, the offence for driving an unregistered vehicle is 20 demerits, while there are currently no demerits on restraint and red-light running offences which pose a significantly higher risk of harm. Similarly, the offence for driving a motor vehicle contrary to the GDLS conditions of your driver licence (excluding display of L plates) carries 35 demerits and is equivalent to driving 20km over the speed limit. In many instances, those licence breaches are due to compliance barriers and do not carry the same level of risk. If the threshold is halved, this could result in licence suspension sooner, potentially resulting in higher rates of unlicensed driving, with implications for crash risk.

As noted under Question 1, SSS is concerned that halving the demerit threshold in this current state could disproportionately impact those who are experiencing barriers to compliance with licensing conditions. Reducing demerits for certain licence and vehicle breaches should be considered. This would introduce more consistency into the system to support public trust and deterrence and ensure that staged licensing suspensions are safety focused and do not worsen existing inequities.

As noted under Question 2, there is an opportunity to introduce an effective demerit point system to incentivise safe driving and deter repeat offending among all drivers, including novices. There are other aspects that could also be considered such as licence suspension periods, how long demerits points stay active, and ensuring transparency and swiftness in which demerits are applied. This is important for achieving deterrence goals and there are opportunities to streamline this, including through the introduction of an electronic driver's licence.

Halving the demerit threshold could improve compliance with high-risk offences including among repeat offenders. However, this would be dependent on wider changes being made to the demerit system to ensure alignment with risk to support safety and equity outcomes and prevent negative unintended consequences.

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

SSS Position: Strongly support

SSS strongly supports a zero-alcohol limit for all learner and restricted licence holders. This aligns with international evidence and best practice and supports safety outcomes for young and novice drivers (Wundersitz et al., 2024).

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

SSS Position: Support

Improved oversight by NZTA will ensure consistency and maintain programme quality and equity outcomes. SSS recommends that this involves a review of advanced driving courses that offer time discounts for restricted drivers to ensure that course content aligns with measurable safety outcomes. This is supported by NZTA research into the effectiveness of advanced driver training.⁸

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

SSS Position: Partially support

SSS supports reducing eyesight testing to streamline processes but has concerns about how accurately people can judge any deterioration of their own eyesight and that this could negatively impact safety. SSS recommends that mandatory testing is still built into the licensing process, and any changes are made upon expert advice from the NZ Association of Optometrists.

Question 6: Do you have any other comments on any of the proposed changes?

This review process is an opportunity for New Zealand to introduce advancements in international best practice and demonstrate leadership in this space as it did as the first country to adopt a GDLS. As shown in other jurisdictions, this will improve safety outcomes for novice drivers and New Zealand. While there are aspects of the proposed changes that we support, the removal of the full test with proposed mitigations could have a significant negative impact on safety outcomes and unintended negative impacts on progression and the overall policy objective. SSS strongly recommends that changes focus on strengthening the level of skill, education and experience of novice drivers and support progression from the learner stage. This requires a holistic view of how the licensing process interacts with the wider driver training and mentoring landscape as well as the overall penalty, enforcement and justice system. Taking a systems approach will help to ensure that changes are not made in isolation and subsequently result in negative unintended consequences.

⁸ <https://www.nzta.govt.nz/assets/resources/research/reports/677/677-the-effectiveness-of-advanced-driver-training.pdf>

This also ensures that changes to the GDLS are considered in the context of the wider Safe System approach. In line with fundamental Safe System principles, while we strive to encourage safe behaviour and have robust licensing systems in place, we accept that people make mistakes and must therefore strengthen the wider system to reduce harm when those mistakes happen.

There are opportunities to adopt evidence-based measures across the GDLS and introduce efficiencies to delivery. Implementing best practice more comprehensively than what is currently proposed would improve safety outcomes and enable wider social and economic outcomes for New Zealand.

a) Hazard Perception Testing

If the full test is removed, it is essential for the current hazard perception component of the full test to be moved to the end of the learner stage, as occurs in Australia. Hazard perception is the only driving specific skill found to correlate with crash risk (Wetton, Hill & Horswill, 2011). This could be introduced as a computerised test as is implemented in Australia, with efficiency gains for delivery.

b) Overseas conversions

If the full test is removed for New Zealand drivers, this should be removed for all (including overseas conversions) to ensure consistency. However, there is a need to strengthen entry requirements due to the high fail rate for overseas conversions. Currently the fail rate for overseas conversions is 56% nationally.⁹ These entry requirements could involve restricted level testing for countries not on the exempt list.

d) Holistic approach to road safety penalties

Penalties in New Zealand are outdated, inconsistent and not proportionate to risk. New Zealand has an opportunity to significantly improve the penalty system and safety outcomes through a wider review, as signalled in the Road Safety Objectives. There is evidence and best practice guidance to support these changes (Sakashita et al., 2021).

SSS supports a move towards a more effective risk based and equitable penalty system for all road users, including special licence conditions for novice drivers that support safety outcomes. This should include a more effective demerit point system to encourage compliance with high-risk offences to deter repeat offending and improve safety, and with more tailored solutions for recidivists including an improved alcohol interlock programme (to increase uptake) and rehabilitative approaches.

SSS recommends considering the proposed changes in the context of the wider penalty system and the opportunity for its review. This would have three key benefits:

- It would ensure that changes made now are aligned and supported by wider improvements, supporting public understanding of risk, deterrence and safety goals, and minimising unintended negative consequences.
- It would ensure that novice drivers are not inadvertently disproportionately impacted down the track when further changes are made.
- It would support public acceptance and buy in for wider safety interventions under the Road Safety Objectives, particularly the expansion of the safety camera system due to its connection to the penalty system and public perceptions of what they are there to achieve.

c) Evaluation and opportunity for staged change

Robust monitoring and independent evaluation will be critical to assessing the impact of any changes that are introduced in New Zealand. There are also opportunities to introduce changes through pilot deployment and a staged approach to inform ongoing and targeted change, as has been successfully implemented in other jurisdictions.

⁹ Data obtained from NZTA, May 2025

Victoria, for instance, conducted detailed surveys of learner driver practice over many years to monitor various aspects of learning to drive and support the need for further change (such as extending the minimum learner period). It also supported the development of licensing materials, messages and identify and support ongoing understanding of the cohort of learners with no access to vehicles and/or a supervising driver. This started with trials of a 'Drive 120' program around 25 years ago which evolved into a targeted 'L2P' Program across the state. L2P has just achieved 1million learner drive hours in Victoria.¹⁰ NSW has been rolling out the DLAP program in parallel.

Tasmania introduced a GDLS in 2009 with enhancements made in December 2020, at which time they commenced a seven-year evaluation to assess the effectiveness of the changes (Watson-Brown et al., 2024). This included increasing minimum supervised hours from 50 to 80, which is an approach that New Zealand could follow.

The Australian Graduated Licensing Scheme Policy Framework acknowledges the need in many jurisdictions to make changes and improvement on a gradual basis and presents a three staged model outlining key elements of progressively more effective GLS models. This framework could be used to inform a staged approach to GDLS improvement in New Zealand in line with best practice.¹¹

d) Opportunities to explore alternative funding sources

New Zealand has an opportunity to explore alternative or more innovative funding models to support novice drivers and other areas of road safety, as they do in Australia. For example, through different insurance models and hypothecation of fines. As highlighted by Thomas et al (2024), increased resourcing is needed to provide the required support solutions in this space and that this includes direct funding. New funding models could not only support the GDLS and its outcomes, but also the related action in the Road Safety Objectives to “Continue to explore initiatives to improve the disproportionate outcomes for some groups in New Zealand (including young people, rural residents and motorcyclists)”.

Safe System Solutions thanks the Ministry of Transport for the opportunity to make a submission on these proposals.

¹⁰ <https://www.premier.vic.gov.au/one-million-hours-clocked-l2p-learner-drivers-seat>

¹¹ <https://www.transport.nsw.gov.au/system/files/media/documents/2023/Australian%20Graduated%20Licensing%20Scheme%20policy%20framework.pdf>

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25 June 2025

OC250480

Hon Chris Bishop**Action required by:****Minister of Transport**

Wednesday, 2 July 2025

SEEKING DIRECTION ON DRIVER LICENSING CHANGES POST CONSULTATION

Purpose

This paper seeks your direction on policy decisions for improvements to the graduated driver licensing system (GDLS) after public consultation. The next step will be to seek Cabinet agreement to issue drafting instructions to the Parliamentary Counsel Office to amend the Land Transport (Driver Licensing) Rule 1999 (the Rule).

Key points

- Public consultation on proposed improvements to the GDLS ran from 14 April to 9 June 2025. A draft summary of submissions is attached at Annex one.
- There was overall support for the proposals from individual submitters. There was more mixed feedback from representative organisations. Driver licensing and road safety organisations supported some proposals but were concerned the package did not do enough to support road safety outcomes.
- Many submitters, including the Automobile Association (AA), Greg Murphy, Driving Change Network (DCN) and Students Against Dangerous Driving (SADD), suggested there should be a longer learner period and mandatory supervised driving hours in the learner stage.
- In response to feedback, we have developed three options:
 - Option 1: changes as consulted on
 - Option 2: strengthened road safety outcomes, with implementation by 1 July 2026
 - Option 3: option two plus mandatory practice hours, with an extended implementation timeline.
- The Ministry's preferred option is option two. It is designed to balance the policy objectives of making the system more accessible, improving road safety outcomes and enabling implementation by 1 July 2026. It entails:
 - Removing the full licence test, introducing hazard perception testing in the restricted test, and the Director of Land Transport initiating reviews of the learner and restricted tests.
 - Extending the learner period to 12 months for under 25-year-olds.

- Having a clean driving record requirement in the restricted stage that aligns more closely with the New South Wales approach by extending licences by six months for demerit offences.
 - NZ Transport Agency (NZTA) encouraging uptake of Drive, an Accident Compensation Corporation (ACC) and NZTA developed free to use programme that provides resources for learner drivers and their supervisors (www.drive.govt.nz).
 - Progressing changes as consulted on to give NZTA greater oversight of advanced driver training courses.
-
- We have not included mandatory supervised hours for learner drivers in our preferred option. While this proposal would support road safety, it could reduce access to the driver licensing system for some people and NZTA advises it would be more complex and costly to deliver. This proposal is in option three.
 - While not included in consultation, some submitters also raised concerns about the overseas licence conversion process and suggested these drivers should sit the restricted test instead of the full test. Our view is this proposal has merit, but further analysis is required which we have commenced. We will aim to include this in the Cabinet paper.
 - Once we have your direction on the policy, we will draft a Cabinet paper seeking approval to issue drafting instructions to the Parliamentary Counsel Office. This work is progressing at pace to meet the timeline set by the previous Minister to have an amended rule in place by the end of the year and a new system implemented by July 2026. To do this, we recommend seeking Cabinet approval in late August.
 - As with the rule you have recently been presented on changes to inspection requirements for vintage vehicles, we will also provide you advice on criteria you have to consider under section 164(2) of the Land Transport Act 198 (the Act) when it comes time to making the Rule. A full timeline is included at the end of the briefing.
 - Alongside changes to the Rule, we also recommend progressing changes to the Act to introduce a zero-alcohol limit for novice drivers. This was widely supported by submitters.
 - This change will need to follow a different timeline [s 9\(2\)\(f\)\(iv\)](#)
Alternatively, if you wished to progress it this year, you could discuss with Minister Meager the possibility of adding it to the Regulatory Systems (Transport) Amendment Bill at Select Committee stage. However, the Chair of the Business Committee has recently noted the threshold for adding matters later in the legislative process should be exceptional and rare.

Recommendations

We recommend you:

1 Indicate your preferred option:

- Option one *OR*; Yes / No
- Option two (*recommended*); *OR* Yes / No
- Option three Yes / No

2 Indicate your preference for progressing changes to the Land Transport Act 1998 to introduce a zero-alcohol limit for novice drivers either: Yes / No

- s 9(2)(f)(iv) *OR* Yes / No
- by seeking permission from the Business Committee to add the proposal to the Regulatory Systems (Transport) Amendment Bill (RSTA) at Select Committee stage Yes / No

3 note if the RSTA is your preferred legislative vehicle for the zero-alcohol proposal, we suggest you discuss this with Minister Meager as the lead Minister on the Bill.

4 note officials will provide further advice on requiring overseas drivers to sit the restricted test when converting a non-exempt licence to inform the August Cabinet paper.

5 note officials will provide further advice on proposed fees to inform the August Cabinet paper.



Joanna Heard
Manager, Safety

...25.. / ...6... / ...2025...

Hon Chris Bishop
Minister of Transport

..... / /

Minister's office to complete:

- Approved Declined
- Seen by Minister Not seen by Minister
- Overtaken by events

Comments

Contacts

| Name | Telephone | First contact |
|--------------------------------------|--|---------------|
| Anita Waring, Senior Advisor, Safety | s 9(2)(a) | ✓ |
| Joanna Heard, Manager, Safety | | |

SEEKING DIRECTION ON DRIVER LICENSING CHANGES POST CONSULTATION

The Government publicly consulted on changes to the driver licensing system

- 1 In April 2024, Cabinet invited the Minister of Transport to report back with options to make getting a licence cheaper and easier, and support drivers to have the skill set to drive safely [CBC-24-MIN-0016].
- 2 In March 2025, Cabinet agreed to release a consultation document with proposed changes to the driver licensing system [ECO-25-MIN-0017]. The proposed changes included removing the full licence test and introducing mitigating measures to maintain road safety.
- 3 Consultation ran for eight weeks. We received 4,135 submissions. They came from individual submitters and a range of organisations including driver licensing and road safety groups, local government, and youth groups.
- 4 Throughout consultation we met with organisations including DCN, the AA, Youth Inspire, Vehicle Testing New Zealand (VTNZ), Office for Rural Communities, SADD, and the New Zealand Police. We also worked closely with NZTA and the Director of Land Transport.
- 5 While most individuals supported the package overall, organisations provided more mixed feedback. Some suggested the changes should focus more on improving road safety than making it easier to get a licence. Almost all submitters supported a zero-alcohol limit for novice drivers and most supported improving oversight of advanced driving course providers.

We have developed three options

- 6 In response to the feedback received, we have developed three options for your consideration. While we consider the options work best as the proposed packages, you could also choose to progress individual components. We have considered the options against the following criteria:
 - Safety – the effect on road safety outcomes.
 - Efficiency – the effect on the efficiency and cost of delivering the driver licensing system.
 - Accessibility – the ability of applicants to access and progress through the driver licensing system
 - Implementation – whether changes can be implemented by 1 July 2026.
- 7 *Option one* is the package as consulted on. This was generally supported by individual submitters but not by organisations. After considering the feedback, and upon further consideration of the proposals, we do not recommend progressing this option.
- 8 *Option two* includes some changes from what was consulted on with additional changes to support road safety and NZTA operational improvements to strengthen the existing regime. This is the Ministry's preferred option.
- 9 *Option three* builds on option two and includes introducing mandatory logged practice hours for learner drivers.

Table showing changes under proposed options compared to status quo

| Element | Learner | Restricted | Full | Changes under Option 1 | Changes under Option 2 | Additional change under Option 3 |
|------------------------|------------------------|--|---------------------------|---|--|--|
| Minimum age | 16 | 16.5 | 17.5 | - | 16, 17, 18 | |
| Testing requirements | Theory, Vision test | Practical, Vision test | Practical, Vision test | No full test, No vision test at restricted and full | No full test, No vision test at restricted and full | |
| Hazard perception test | - | - | Yes | Learner (not full) | Restricted (not full) | |
| Duration of stage | 6 months | 18 months, or 12 months with advanced driving course | | Restricted period restarts if any offence is committed | Learner 12 months for under-25s, 6 months if over 25 6 months extension to restricted if any demerit offence is committed | |
| Conditions of stage | Supervisor in car | No passengers No driving 10pm-5am | | - | - | Mandatory minimum driving hours in learner stage |
| Suspension of licence | | Upon reaching 100 demerit points | | Upon reaching 50 demerit points in learner or restricted | - | |

Option two provides a balanced approach across the policy objectives

- 10 The Ministry considers option two provides the most balanced approach across the criteria of improving access, efficiency and safety. NZTA advises it can be implemented by 1 July 2026.

We recommend removing the full test and introducing hazard perception earlier in the testing system

- 11 In line with consultation, we recommend removing the full test and moving hazard perception testing from the full test to the restricted test. NZTA has considered a computerised hazard perception test or reallocating the hazard perception element to the restricted practical test.
- 12 NZTA estimates a computerised hazard perception test would cost \$77 which would bring the total cost of getting a full licence beyond what it is currently. Given this, at this stage we recommend hazard perception is reallocated to the restricted test which would impose no extra cost. We could revisit this in the future if NZTA develops a more cost-effective computerised test.

We recommend extending the learner period

- 13 While not proposed through consultation, several organisations, including the AA, SADD, and Greg Murphy, recommended extending the learner stage from six to 12 months for under 25-year-olds. This would have the dual benefit of more time for supervised practice and increasing the minimum age to get a restricted licence to 17 years (and a full licence 18 years), both of which are shown to improve road safety outcomes. A 12-month learner period is common overseas, including Australia.
- 14 Young people are still developing their ability to assess risks, manage emotions, and make sound decisions. Extending the learner stage would allow more time for important brain development and maturity while still allowing most people to get their full licence before, or just after, they leave school

NZTA will undertake operational improvements

- 15 Option two includes operational improvements to strengthen the existing regime. These changes are aimed at addressing concerns raised by submitters, such as:
- the learner test questions being more of a literacy and memory test than testing how to be a safe driver.
 - the restricted test route in some areas of New Zealand can be learned and therefore does not effectively test driving skills.
 - the lack of information to help learner drivers and their supervisors know what skills they need to develop to be safe drivers (other than just passing a test).
- 16 If the full test is removed it is important the learner theory and restricted practical tests are fit-for-purpose. These tests are currently set independently by the Director of Land Transport.
- 17 The Director has noted he will initiate a review of the learner and restricted tests in line with his statutory responsibilities. NZTA could undertake initial reviews of both tests before 1 July

2026. These reviews would initially be limited to meet the implementation deadline, but further reviews could be considered in the future to meet any outstanding concerns.

- 18 In addition, the Director is committed through the Road Safety Objectives to raise awareness of the Drive programme. The Drive programme, funded by NZTA and ACC, is a comprehensive resource for novice drivers and their supervisors. It includes online learning modules, paper-based resources, and a free app that can track lessons and monitor progress. ACC data shows that young people who use Drive are 24% less likely to make a motor vehicle injury claim.
- 19 NZTA is implementing a three-year plan to increase uptake of Drive, including through direct engagement with schools, councils and community groups. This should contribute to addressing the information gaps for learner drivers and their supervisors and help ensure learner drivers learn all the skills necessary to be safe drivers.

The clean driving record requirement in the restricted stage

- 20 Consultation proposed that the restricted period would restart if a driver committed any offence. Some submitters felt this was too harsh and could result in someone staying on their restricted for a long time and risk them never getting their full. Others suggested the proposal should focus on high-risk driving behaviours.
- 21 We recommend the clean driving record requirement applies to any demerit offence and results in an extension of six months, instead of restarting the restricted period. A list of selected demerit offences is in Annex three. New South Wales takes a similar approach, where six months is added to the provisional licence for any licence suspension.
- 22 Applying the requirement to any demerit offence reinforces to novice drivers that no offence is 'acceptable'. We consider the approach a strong enough deterrent without pushing out the time excessively or risk drivers disengaging from the system entirely.
- 23 NZTA advised that using demerit offences would be simpler to administer and allow for implementation by 1 July 2026. ^{s 9(2)(f)(iv)}

Halving the demerit threshold for licence suspension

- 24 Consultation proposed to reduce the licence suspension threshold from 100 to 50 demerit points for learner and restricted drivers.
- 25 Submitters generally supported the proposal and felt it would be a good deterrent to unsafe driving by novice drivers. Some submitters, including youth groups, were concerned it is a harsh punishment for people still learning to drive and who may make mistakes. Some suggested it should not apply to offences unrelated to driving behaviour, such as driving an unregistered vehicle. Some suggested it would result in more people driving unlicensed, increasing pressure on the court system.
- 26 Other submitters raised issues with the wider demerit point system and suggested any change should be considered at a system level, rather than small changes in isolation.

- 27 Halving the demerit threshold would require changes to the Act. ^{s 9(2)(f)(iv)}
[REDACTED]
- 28 NZTA indicates this proposal would be challenging to deliver and administer. We considered whether we could instead introduce 'double demerits' for novice drivers through regulation changes, but this would require changes to the regulation-making power in the Act.
- 29 Considering these issues, we do not recommend progressing a reduced demerit threshold at this time. ^{s 9(2)(f)(iv)}
[REDACTED]

Option three includes introducing mandatory practice hours but could reduce access and may not be able to be implemented by 1 July 2026

- 30 Option three builds on option two and includes mandated minimum practice hours in the learner stage. Many submitters noted that comparable countries with a single practical test all require mandatory driving hours and/or professional driver education, and these measures are shown to improve safety outcomes of novice drivers.
- 31 The Drive app has GPS tracking capability and could be leveraged to support logging practice hours. A digital solution would limit the risk of forged logbooks ^{s 9(2)(f)(iv)}
[REDACTED] We are advised that in Victoria, around 90 percent of people use the app option.
- 32 The benefits of mandating logged practice hours with a suitable supervisor should be balanced against potential access barriers it could create. We heard from youth groups that such a requirement would pose barriers to many young people, and several organisations suggested additional funding would be needed to support people to meet the requirements.
- 33 We consider the combination of legislative and operational changes in option two could achieve the desired policy of improving access and road safety outcomes without mandating a minimum number of logged hours.
- 34 NZTA notes this proposal would likely require digital system change which may push the implementation timeline out beyond 1 July 2026. If you wish to progress this option, we will work with NZTA to provide further advice on implementation and timelines.

We also recommend other proposals be progressed

We recommend amending the eyesight testing proposal

- 35 Currently an eyesight test is required at each licence stage (learner, restricted and full) and licence renewal (typically every 10 years). Consultation proposed to remove the tests at the restricted, full, and when renewing a licence and instead require a test at the learner stage and when first renewing a licence after age 45. The proposal was largely designed to enable online licence applications and renewals.

- 36 This was the least supported of the proposals. Submitters were concerned it would allow people with poor vision to drive and many suggested any changes should be developed with and supported by eyesight professionals.
- 37 The New Zealand Association of Optometrists (NZAO) did not support this proposal. NZAO submitted that while age is often a factor, vision can change at any age and it was concerned someone could go from age 16 to 45 without any vision check.
- 38 Given this feedback, we recommend keeping the test at the learner stage and each licence renewal, but removing it from the restricted and full stage. This would support a move to online applications for a full licence if the full test were removed. NZTA would undertake further work in the future to enable online licence renewals, including alternative approaches to eyesight testing. NZTA supports this approach.

Zero-alcohol limit for all novice drivers

- 39 This proposal was well supported by individuals and organisations, who agreed that learner and restricted drivers of any age should not be allowed any alcohol before driving. The change requires an amendment to the Act s 9(2)(f)(iv)
- While it would come into effect after the GDLS rule changes, we do not consider this to be problematic in terms of implementation.
- 40 Alternatively, you may wish to explore adding it into the Regulatory Systems (Transport) Amendment Bill (RSTA) at the Select Committee stage, which is following an earlier timeline (enactment early 2026). You would need to discuss this with Minister Meager, as he is leading the Bill.
- 41 It may not meet the threshold for adding proposals later in the legislative process. We note the Chairperson of the Business Committee has recently advised the threshold for adding policies in at a late stage should be exceptional and rare. RSTA is also time sensitive and broad in scope and adding this in may risk not meeting timeframes.

NZTA oversight of approved course providers

- 42 Submitters were supportive of changes to improve NZTA's oversight of course providers. There are two Class 1 approved providers and around 400 Classes 2-5 approved providers which provide a pathway to getting a heavy vehicle licence.
- 43 The changes include requiring providers to renew their approval every five years, allowing NZTA to issue a stand-down period of up to 10 years, and strengthening the 'fit and proper' assessment. This change would mean the current approved Class 1 advanced driver training courses would need to reapply to NZTA for approval.

We received feedback on the overseas conversion process from road safety organisations

- 44 Licence holders from any country can drive on their home licence for 12 months before converting to a New Zealand licence (temporarily extended to 18 months until 31 October 2026). Countries that are assessed as having similar driving conditions can convert without having to sit any tests (exempt countries). Licence holders from non-exempt countries must pass the learner and full tests.

- 45 Consultation did not propose any change to the process. However, some submitters, including VTNZ, Greg Murphy, and DCN, recommended these drivers sit the restricted test instead of the full. The restricted test is a longer, more thorough test and is a better test of a driver's skills.
- 46 In 2024, overseas conversions made up nearly 60 percent of all full tests conducted. VTNZ figures show that in the same year, the overseas conversion pass rate was 34 percent. This suggests many of these drivers lack the skills the drive safely in New Zealand.
- 47 We consider there could be merit in exploring this change but in the time available have not fully analysed the implications, including any potential operational implications for NZTA and VTNZ who need to ensure there is the appropriate testing capacity. We recommend we provide you with further advice to determine if you would like to take it forward as part of the August Cabinet paper.

NZTA provided early estimates of driver licensing fees under the proposed new structure

- 48 The proposed changes have new fees associated with them which will need to be set through regulations separate to the Rule change. NZTA's indicative fees are outlined below:

| | Learner | Restricted | Full | Total |
|---|---------|------------|-------|--------|
| Status quo | 96.10 | 167.50 | 98.90 | 362.50 |
| Preferred option - hazard perception in restricted test; reduced eyesight testing; no full test | 96.10 | 159.76 | 36 | 291.86 |

- 49 We recommend we come back to you as part of the August Cabinet paper with further advice from NZTA to confirm the fee structure and seek Cabinet's approval to the fees.

Next steps

- 50 The key steps and indicative timeline for amending the Rule are below:

| Process | Date |
|---|--------------------------|
| Minister's direction on preferred option | By 2 July 2025 |
| Draft Cabinet paper including indicative fees, summary of submissions and updated Regulatory Impact Statement to Minister | 30 July 2025 |
| Ministerial and departmental consultation | 4 – 11 August 2025 |
| Cabinet Economic Policy Committee (ECO) | 20 August 2025 |
| Cabinet confirms ECO decisions | 25 August 2025 |
| Parliamentary Counsel Office drafts amendment Rule | September – October 2025 |

| Process | Date |
|--|------------------------|
| Cabinet package and briefing with section 164(2) matters to the Minister | November 2025 |
| Cabinet and Executive Council confirms amendment Rule | November/December 2025 |
| Implementation date | 1 July 2026 |

Annex 1 is refused under section 18(d) as the information is available here: <https://www.transport.govt.nz/assets/Uploads/Submission/Summary-of-Submissions.pdf>

RELEASED UNDER THE
OFFICIAL INFORMATION ACT 1982

30 July 2025

OC250585

Hon Chris Bishop**Action required by:****Minister of Transport**

Monday, 4 August 2025

IMPROVEMENTS TO THE GRADUATED DRIVER LICENSING SYSTEM – POST CONSULTATION POLICY DECISIONS

Purpose

This paper:

- provides you with a draft Cabinet paper on proposed improvements to the Graduated Driver Licensing System (GDLS). The Cabinet paper seeks approval to issue drafting instructions to the Parliamentary Counsel Office to amend the Land Transport (Driver Licensing) Rule 1999 (the Rule), the Land Transport (Regulatory Fees) Regulations (the Regulations) 2023 and the Land Transport Act 1998;
- provides you with further analysis on the proposal to extend the learner licence period to 12 months; and
- seeks your agreement to circulate the Cabinet package for Ministerial and departmental consultation commencing 4 August 2025.

Key points

- In our previous GDLS briefing to you, we recommended extending the learner licence period from six to 12 months for under 25-year-olds (OC250480 refers). You asked for further analysis on this proposal and requested that we engage with relevant agencies, including those representing rural and young people. This briefing provides further information and feedback from the Ministry for Primary Industries and the Ministry of Social Development.
- You could consider an alternative option where the extended learner period can be reduced back to six months upon completion of a minimum number of practice hours or driver training courses approved by the New Zealand Transport Agency (NZTA). NZTA notes there would be development and implementation challenges to deliver this option, and it may require additional funding. NZTA would likely need to stagger implementation and bring this change into effect after 1 July 2026.
- In our previous briefing we also noted we would provide further advice on the overseas licence conversion process and the proposed new fees for the GDLS changes. We do not recommend changes to the overseas conversion process at this time and instead recommend NZTA undertakes a review in due course.

- We recommend you seek agreement from Cabinet to introduce new fees to reflect the changes being made to the Rule. This will require amendments to the Regulations. NZTA has presented two options for fees. Option one is to reset all fees to fully recover the costs of delivering the services. Option two is to only change fees to reflect policy decisions.
- The Ministry recommends option two which would maintain most fees and only make changes to reflect policy decisions. We recommend further work is done before setting all fees at cost recovery, which could be considered through the NZTA regulatory funding review that is underway. This would allow for closer scrutiny of fees as part of NZTA's wider delivery of its regulatory functions. A draft Cost Recovery Impact Statement is attached.

Recommendations

We recommend you:

- | | | |
|---|--|----------|
| 1 | agree to extend the learner licence period to 12 months for under 25-year-olds | Yes / No |
| 2 | agree to seek Cabinet agreement to proposed new fees to reflect changes agreed by Cabinet (option two in the draft Cost Recovery Impact Statement (CRIS)), noting NZTA will continue to under-recover the cost of delivering driver licensing services | Yes / No |
| 3 | agree to circulate the attached Cabinet paper, Regulatory Impact Statement, draft CRIS and summary of submissions for Ministerial and departmental consultation from 4-11 August 2025 | Yes / No |

Paul

Paul O'Connell
Deputy Chief Executive, Sector Strategy
30 /07/2025

Hon Chris Bishop
Minister of Transport
..... / /

Minister's office to complete:

- | | |
|--|---|
| <input type="checkbox"/> Approved | <input type="checkbox"/> Declined |
| <input type="checkbox"/> Seen by Minister | <input type="checkbox"/> Not seen by Minister |
| <input type="checkbox"/> Overtaken by events | |

Comments

Contacts

| Name | Telephone | First contact |
|--------------------------------------|-----------|---------------|
| Anita Waring, Senior Advisor, Safety | s 9(2)(a) | ✓ |
| Joanna Heard, Manager, Safety | | |

IMPROVEMENTS TO THE GRADUATED DRIVER LICENSING SYSTEM – POST CONSULTATION POLICY DECISIONS

- 1 In response to our previous briefing (OC250480 refers) you agreed to progress our recommended option, which includes:
 - removing the full test and moving the hazard perception test to the restricted test
 - extending the learner licence stage to 12 months for under 25-year-olds
 - a clean driving record requirement to progress to a full licence, where any demerit offence results in a six-month extension to the restricted stage
 - a zero-alcohol limit for learner and restricted drivers
 - removing the eyesight tests at the restricted and full stage
 - improving NZTA oversight of approved course providers.
- 2 The Cabinet paper in Annex one reflects those proposals. It seeks Cabinet agreement to issue drafting instructions to the Parliamentary Counsel Office to amend the Land Transport (Driver Licensing) Rule 1999 (the Rule), the Land Transport (Regulatory Fees) Regulations 2023 (the Regulations) and the Land Transport Act 1998 (the Act).
- 3 The Cabinet paper attaches the final Regulatory Impact Statement (RIS), draft Cost Recovery Impact Statement (CRIS) and summary of submissions. We note the CRIS is subject to the Ministry's internal panel review. This will be finalised before lodging.
- 4 You requested further analysis on extending the learner licence to 12 months. You noted extending the period would have an impact on young people, including in rural areas, who rely on a licence to access many activities. You asked that we also test this proposal with the Ministry for Primary Industries (MPI) and the Ministry of Social Development (MSD). Our analysis is outlined below.
- 5 The Cabinet paper and RIS are drafted assuming you agree to extending the learner period. If you do not agree to take this option to Cabinet, we would need to update the documents to reflect your decision.

The Ministry does not recommend removing the full test without strengthening other parts of the licensing system

- 6 New Zealand has one of the highest rates of road deaths in the developed world and young drivers are over-represented in crash statistics. In 2024, young drivers (16-24 years) made up 12 percent of licensed drivers but were responsible for 23 percent of fatal and serious injury crashes. In 2024, 74 people died in crashes where a young driver was at fault.
- 7 The package of GDLS improvements released for consultation aimed to make it more accessible and affordable to get a licence while supporting road safety. While most individuals supported the package overall, organisations provided more mixed feedback. Some suggested the changes should focus more on improving road safety than making it easier to get a licence.

- 8 Submitters including the Automobile Association, the Director of Land Transport, Driving Change Network, Brake, Greg Murphy and Students Against Dangerous Driving (SADD), did not support removing the full test unless other measures were introduced, such as a longer learner period and logged hours in the learner stage. The submissions cited overseas comparisons and research that shows the benefits of more practice hours and an older minimum licensing age (which would be achieved through extending the learner period).
- 9 New Zealand is in line internationally with a minimum age for a learner licence of 16 years, which is generally considered the appropriate age to start learning to drive. However, we can progress through the GDLS much quicker than many other countries and have no requirements for any practice, education or training. If the full test is removed, it is important there are enough safeguards throughout the system to mitigate any potential safety risk.
- 10 Most comparable countries have a learner period of 12 months (compared to our six) and many have a restricted period of at least 24 months (compared to our 18 months that can be reduced to 12 with an approved driving course). We have attached a table of overseas licence comparisons in Annex two.

Research has shown a longer learner period leads to crash reduction

- 11 In 2024, the pass rate for the restricted practical test in New Zealand was around 50 percent.¹ This suggests many people eligible to sit their restricted licence test are not ready and more could be done in the learner stage to support these drivers.
- 12 There are several studies evaluating the effectiveness and benefits of driver licensing systems and their components. A 2015 report by Austroads² reviewed findings of studies evaluating specific GDLS components including learner licence periods. The report found various benefits of a 12-month learner period compared to six-months, including a 13 percent reduction in fatal crashes of 15-17-year-olds and a 17 percent reduction in fatal crashes in 17-year-olds. The report concluded the optimal learner period to be 12 months, provided that the extra time was used to increase supervised driving time.
- 13 A 2019 report commissioned by the Ministry of Transport evaluated New Zealand's GDLS.³ The report found crash rates for 17- and 18-year-old restricted drivers were around 1.5 times higher than for all drivers aged 16 to 27. The author suggests more could be done in the learner stage to reduce the risk of these drivers once on their restricted licence. The report refers to several studies that found benefits of a longer learner period, including evaluations of driver licensing systems in the United States and Victoria and Queensland.
- 14 These studies are not always easily applicable to the New Zealand context as every driver licensing system is made up of varying components and it is difficult to analyse the effectiveness of one component on its own. As such, we have been unable to model the safety benefit of extending the learner period to 12 months. However, we expect a 12-month learner period would support improved road safety outcomes for novice drivers, when complemented by the other proposed changes.

¹ This number has hovered between 50% and 57% since 2022. Free resits did not affect restricted test pass rates in the same way they did for the learner test and overseas conversions.

² Senserrick, T. & Williams, A. (2015) *Summary of Literature of the Effective Components of Graduated Driver Licensing Systems*. Austroads.

³ <https://www.transport.govt.nz/assets/Uploads/Report/GDLS-evaluation-report.pdf>

- 15 Most research notes a longer learner period is most beneficial when learner drivers use the time for more supervised practice in varying roading environments and weather conditions. The Drive programme (a free driver licensing programme funded by NZTA and Accident Compensation Corporation (ACC)) includes modules that teach skills for different conditions to help learner drivers get varied driving experiences. NZTA and ACC are committed to growing outreach of Drive, and improving voluntary uptake of the programme is a key element of our recommended package.

Not everyone progresses to their restricted licence as soon as eligible

- 16 Most new learner drivers are under 25 years and would therefore be subject to a 12-month learner period. However, many people already spend longer than 12 months on their learner licence. NZTA advises that 37 percent of people who got their learner licence in 2023 progressed to their restricted within a year.
- 17 People stay on their learner for longer than the minimum period for a variety of reasons. We know some people get a learner licence for identification purposes. Some may spend longer because they want more practice before sitting their restricted test. A longer learner period would ensure every young learner driver has more time for supervised practice.

We engaged relevant agencies to discuss the proposal

- 18 We met with colleagues from MPI (Office for Rural Communities) to test this proposal. They did some informal sounding with rural representatives, including Rural Women New Zealand and internal on-farm support colleagues. The general view from these discussions was that safety is paramount and they felt the safety benefit would outweigh the imposition of spending an extra six months on a learner licence.
- 19 The representatives were based in Waikato, Gisborne and Otago and they all noted their concerns for the safety of their young people driving on rural roads. In 2024, 68 percent of fatal crashes occurred on open roads. 21 percent of these crashes involved a young driver at fault, resulting in 51 deaths.
- 20 They noted the variable and sometimes challenging terrain, road conditions and adverse weather conditions in some parts of the country and supported extending the learner licence period to enable these learner drives to gain more experience with a supervisor across different conditions.
- 21 We also met with the youth and employment parts of MSD. They are concerned about the impact a longer learner period would have on employment opportunities for young people, particularly those who face the highest barriers. MSD provides driver licence support programmes to support young people to get a licence, which is often a key enabler to getting a job. MSD notes the need for their programmes far outstrips the funding it receives. MSD was unable to provide any data to quantify the impacts of the proposal.
- 22 In its consultation submission, SADD notes the importance of considering adolescent brain development in relation to learning to drive. SADD notes the part of the brain responsible for managing risk, emotions and judgement continues to develop well into the early 20s, and suggests there needs to be sufficient measures in place to mitigate the risks young people

face. SADD recommends a 12-month learner period to give young people more time to mature before being able to get their restricted licence.

The Director of Land Transport supports the proposal

- 23 The Director supports the increase to a 12-month learner licence period. He notes that internationally this change has been shown to have a significant impact on deaths and serious injuries among young drivers.
- 24 The Director notes evidence about the use of mandatory logged hours with a supervisor is less conclusive, being largely based on modelling. Most Australian states require learner drivers to log a certain number of supervised hours to ensure novice drivers get the practice they need in different, complex driving situations. NZTA and the Director are monitoring the research as well as reviewing GDLS evaluation reports as Australian states publish them and will advise the Ministry of Transport of any material developments.

Considering feedback, the Ministry of Transport still recommends extending the learner period

- 25 New Zealand's minimum age to be fully licensed of 17.5 years is well below most other countries. In most Australian states and many European countries, it is 20 years. With a longer learner period, if someone progresses as quickly as possible they could have their restricted licence at 17 years and full licence at 18 years.
- 26 We note that according to the Ministry of Education, in 2023, 21 percent of people left school before the age of 17.⁴ Some of these people may need a licence to access a job or further education and would have to wait longer to sit their restricted test. However, we consider extending the learner period alongside the other changes provides a balanced approach to improving access and road safety.
- 27 If you or Cabinet are concerned about the impact a longer learner period would have on young people, you could progress the extended learner period with an option to reduce it back to six months upon completion of a specified number of practice hours or driving courses. The Director of Land Transport could set the minimum number of hours (up to a legislated cap) and approve driving courses that would count towards the reduction in time spent in the learner stage.
- 28 This was raised during our conversations with other agencies. The Office for Rural Communities noted rural people often drive longer distances and would find it relatively easy to complete the hours. SADD also suggested this option.
- 29 NZTA notes there would be initial development and implementation challenges to deliver this option, and it may need to be brought in after 1 July 2026.

We have considered the overseas conversion process

- 30 In our previous briefing, we noted we would provide further advice on the proposal that overseas licence conversions should sit the restricted test instead of the full test.

⁴ https://www.educationcounts.govt.nz/_data/assets/pdf_file/0004/208093/Indicator-Student-retention-2023-v2.pdf

- 31 We do not recommend any changes at this point. In the time available, we have not been able to fully consider the implications of this change. There are several issues that need further analysis and consideration:
- the reasons behind the low pass rate of overseas conversion driving tests (around 34 percent in 2024)
 - the time a driver can drive in New Zealand before being required to convert their licence
 - the ability for the time to restart upon leaving and re-entering the country
 - the likely affect on testing resources and possible alternatives.
- 32 Rather than amending the Rule to require these drivers to sit the restricted test now, we recommend NZTA considers this further. There may better ways to improve safety outcomes of these drivers than changing the practical test. If an amendment to the Rule is required, this could be progressed in a future rule amendment.

Further fee information

- 33 New fees will be required to reflect the removal of the full test and eyesight test from the restricted and full stages. NZTA has provided two options which are discussed in the draft CRIS:
- Option one – set all fees to recover the cost of delivering the services
 - Option two – amend the current fees to reflect the proposed changes to the system (removing the full test and vision tests from certain stages).
- 34 Option one would reduce the overall cost of getting a full licence by s 9(2)(b)(ii) Option two would reduce the cost by \$80.
- 35 We recommend option two – retaining the current fees with only necessary changes to reflect policy changes. This means NZTA will continue to under-recover the cost of delivering these services. This could be addressed through the NZTA regulatory funding review, with resulting new fees in place s 9(2)(f)(iv) following closer scrutiny of NZTA costs and Cabinet consideration.
- 36 The Director of Land Transport notes one of his responsibilities is ensuring regular reviews of the land transport regulatory funding system such as the funding review which is underway. In the Cabinet paper, the driver licence fees are proposed to be set at a level that will under-recover the cost of providing Class 1 driver licensing services (the costs are primarily comprised of contracted third-party commissions).

37 s 9(2)(f)(iv)

s 9(2)(b)(ii)

Next steps

- 38 Pending your approval, the next step is Ministerial and departmental consultation. The next steps and proposed dates are:

| Process | Date |
|--|--------------------------|
| Ministerial and departmental consultation (concurrent) | 4 – 11 August 2025 |
| Lodge Cabinet paper | 14 August 2025 |
| Cabinet Economic Policy Committee (ECO) | 20 August 2025 |
| Cabinet confirms ECO decisions | 25 August 2025 |
| Parliamentary Counsel Office drafts amendment Rule and Regulations | September – October 2025 |
| Cabinet package and briefing with section 164(2) matters to the Minister | November 2025 |
| Cabinet and Executive Council confirms amendment Rule and Regulations | November/December 2025 |
| Implementation date | 1 July 2026 |

- 39 This work is progressing at pace into order to have an Amendment Rule in place by the end of 2025 and the changes implemented by 1 July 2026.
- 40 We recommend the Amendment Rule is made by the Governor-General, by Order in Council. This process is set out in section 152A of the Act. This will require a Cabinet Legislation Committee (LEG) paper. The LEG paper can also seek approval of amendments to the Regulations for the new driver licensing fees.
- 41 While you can make a rule as Minister of Transport under section 161 of the Act, this requires you to publish a notice of your intention to make a rule and consult with such persons, representative groups and others as you consider appropriate. You are also required to give interested persons a reasonable time to make a submission on your proposal.
- 42 While consultation on a draft rule itself is not explicitly required by the Act, this has previously been the practice. Rules made by the Governor-General are not required to be consulted on. To avoid any challenge, and because a LEG paper will be required for the new fees, we consider making the rule through the Order in Council process is the better approach.
- 43 When we provide you the draft Amendment Rule to take to Cabinet we will include further advice on the matters in Section 164(2) of the Act you must have regard to. This includes how the Amendment Rule may affect land transport safety, whether the rule assists economic development and access and mobility, and the costs of implementing the Rule.

Attachment is refused under section 18(d) as the final Cabinet paper is available here:
<https://www.transport.govt.nz/assets/Uploads/Paper/Cabinet-paper-Post-consultation-report-backand-final-policy-decisions.pdf>

ANNEX 2: NEW ZEALAND COMPARED TO OTHER INTERNATIONAL JURISDICTIONS

| | Learner stage | | | | | Restricted (equivalent) stage | | | Overall (all stages) | | | |
|----------------------------|---------------|--|--|--------------------------------|--|----------------------------------|--|---|---|---------------------|-------------------------|-------------------------------|
| | Min. age | Min. Holding period | Min. practice requirements | Supervisor requirement | Exit test | Min. age | Min. holding period | Exit test | Demerit threshold | BAC limit | Min. cost (NZD approx.) | Min. Full licence age |
| New Zealand | 16 | 6 months | None | Held full licence for 2 years | Practical test | 16.5 | U25: 18 months (12 with advanced driving course) 25+: 6 months (3 with advanced driving course) | Practical test including on-road hazard perception test | 100% in 2 years | U20: 0 20+: 0.05 | \$362.50 | Current: 17.5 Proposed: 18 |
| Queensland, Australia | 16 | 1 year | U25: 100 hours including at least 10 at night 25+: none | Held full licence for 1 year | Computerised hazard perception test and practical test | P1 licence: 17 P2 licence: 18 | P1 licence: 1 year P2 licence: 2 years (1 year if 23+) 24+: none | None | Learner: 33% P1/P2 licence: 41% | 0 | \$559.07 | 20 |
| New South Wales, Australia | 16 | 1 year, unless age 25+ then can pass computerised hazard perception test early to get P1 | U25: 120 hours including at least 20 at night 25+: none | Holds full licence | Computerised hazard perception test and practical test | P1 licence: 17 P2 licence: 18 | P1 licence: 1 year P2 licence: 2 years | None | Learner and P1 licence: 33% P2 licence: 58% (Any speed offence results in licence suspension) | 0 | \$501.60 | 20 |
| Japan | 18 | 6 months from learners to full, or redo learner process | Theory test and practical test (min. 5 practical sessions in 3 months prior to test) | Held full licence for one year | One day course including theory test and practical test | 18.5 | n/a | None | 100% in 3 years | 0 | \$229.42 | 18.5 |
| Republic of Ireland | 17 | 6 months | 12 x 1 hour sessions with a driving instructor | Held full licence for 2 years | Practical test | 17.5 | 2 years | None | 7 out of 12 (58.3%) | 0.02 | \$1,202.31 | 19.5 |
| Sweden | 16 | Until at least age 18 and all tests passed | 3 hours of risk training theory and 3-4 hours of practical lessons | Authorised instructors only | Theory test and practical test | 18 | 2 years | None | No demerit scheme, but if disqualified during first 2 years must reapply for learner licence | 0.02 | \$628.00 | 20 |
| United Kingdom | 15.75 | Until at least age 18 and all tests passed | None | Held full licence for 3 years | Theory test, computerised hazard perception test, and practical test | 18 | 2 years | None | 6 out of 12 (50%) in learner stage If exceeded, revert to learner stage | 0.02 | \$255.15 | 19 |