

Summary of submissions: Proposed improvements to the Graduated Driver Licensing System

Submissions received

Consultation on the proposed changes to the Graduated Driver Licensing System (GDLS) ran from 14 April to 9 June 2025. We received a total of 4134 responses.

Responses were from:

- 4029 individuals
- 90 organisations
- 15 did not answer

For the purposes of this summary:

- *organisation* includes non-government organisations, businesses, advocacy groups, central and local government agencies, and iwi or Māori organisations.
- *individual* is those who submitted on behalf of themselves.
- Some responses through the email inbox were coded *unclear* if:
 - officials were unable to classify them as support or oppose
 - they discussed issues not related to the proposal
 - they were unable to be classified into a theme

Overall themes

Each proposal received overall support, except for the proposed changes to eyesight screenings.

Those in support of the proposed changes felt they would reduce barriers in the driver licensing system. Those who opposed the proposals often suggested that driver licensing initiatives should focus on strengthening driver education and support for community programmes. Some commented that changes to the licensing process for overseas drivers and senior drivers should also be considered.

81 percent of submitters supported the clean driving record requirement in the restricted stage. They generally felt it would benefit safety by deterring driving offences. Some submitters supported the idea but suggested it may be excessively harsh for non-safety related offences. Those who opposed the requirement generally felt it was unfair to novice drivers who make mistakes, and could result in them disengaging from the licensing system altogether.

72 percent of submitters supported the reduced demerit threshold for learner and restricted drivers. Many felt it would deter repeat offending at the restricted stage. Some submitters supported the proposal but were concerned that repeat offenders may not be concerned with licence suspension and would continue to drive. Submitters who opposed the proposal generally felt that all drivers should be held to the same standards.

A common theme with submissions on the clean driving record requirement and reduced demerit threshold proposals was that many submitters felt that harsher penalties should only apply for safety-

related offences.

91 percent of submitters supported a zero-alcohol limit for learner and restricted drivers. Submitters felt the proposal aligns with road safety and public health goals and would not be a barrier to access. Those who opposed the proposal felt a low amount of alcohol consumption is unlikely to result in a road crash. Some noted the 50 demerit point penalty for drink-driving, and that the proposed reduced demerit threshold would mean immediate licence suspension for residual alcohol.

66 percent of submitters supported the proposal to improve the New Zealand Transport Agency's (NZTA) oversight of approved course providers, saying more providers should be approved, or that NZTA should be able to proactively monitor approved courses.

47 percent of submitters supported the proposed changes to eyesight screening requirements. Submitters were generally concerned about the safety impact of this proposal. Some felt the access benefits from the proposed changes would be minimal. Some also said that eyesight can gradually deteriorate without realising. There were also concerns about the potential for fraud and deception if only a declaration was required for licence renewals.

Those who supported the proposal felt that younger drivers are unlikely to have eyesight problems, or that repeat testing is burdensome and often inaccurate. Some commented that driver testing agents are unqualified to screen for eyesight problems.

Remove the full licence test and introduce new safety measures

A total of 4129 submissions commented on this proposal. 64 percent of submitters either supported or strongly supported the proposal, 32 percent opposed or strongly opposed it, and 4 percent were neutral.

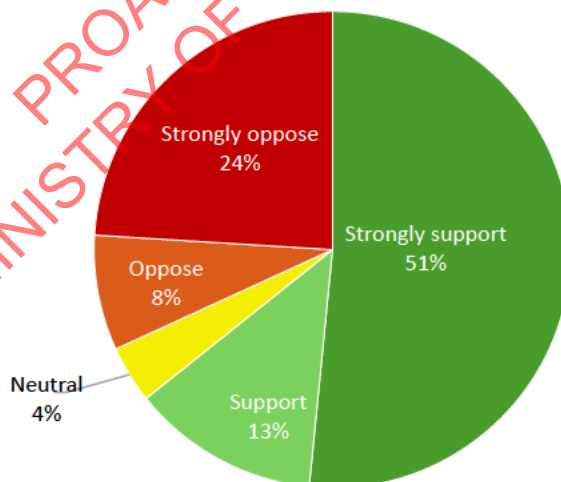
Some submitters used this question to express general views on driving and road safety, rather than the specifics of the proposal.

Individual submitters who supported the proposal generally felt the restricted licence test is robust enough and supported the proposal to remove the full test to save time and money for applicants.

Many submitters who did not support the proposal felt safety should be the main consideration of the driver licensing system. Some submitters suggested the full licence test is a good final check of driving skills before being able to drive without restrictions. Many suggested driving is a privilege, not a right, and a licence should not be made cheaper or easier to get. Some submitters felt the proposed safety measures relied too heavily on penalties rather than supporting young drivers to learn to drive safely.

Most organisations opposed the proposal overall. While some were not opposed to removing the full test in principle, they felt the proposed safety mitigations were not strong enough and suggested that further measures such as a longer learner period, logged practice hours, and professional training or lessons should be made mandatory or incentivised.

Removing the full test with the proposed safety mitigations



Introduce a clean driving record requirement to progress to the full licence

A total of 4122 submissions commented on this proposal. 81 percent supported or strongly supported, 9 percent opposed or strongly opposed, and 10 percent were neutral.

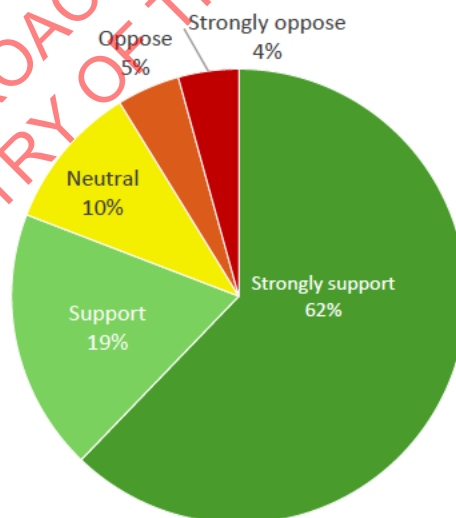
Individual submitters who supported the proposal agreed there should be clear consequences and accountability for novice drivers who offend.

Individual submitters who did not support the proposal felt that learning drivers may make mistakes and that the zero-tolerance approach was too harsh. Some submitters felt it was overly punitive and could create a barrier to getting a licence. Some suggested there should be shorter extensions to the licence period that reflect the safety risk of the offence.

Some submitters who supported and opposed the proposal felt that its effectiveness would depend on the Police's ability to enforce offences.

Organisations shared similar concerns as individuals. Many felt the clean record should only consider offences that risk road safety, rather than more administrative offences (such as driving an unregistered car). Some suggested there should be a clean record requirement in the learner stage.

Clean driving record requirement to progress to the full licence



Halve the demerit threshold for licence suspension for learner and restricted drivers

A total of 4119 submissions commented on this proposal. 72 percent supported or strongly supported, 11 percent opposed or strongly opposed, and 17 percent were neutral.

Supporters felt that meaningful consequences for offending would help to change unsafe driving behaviour.

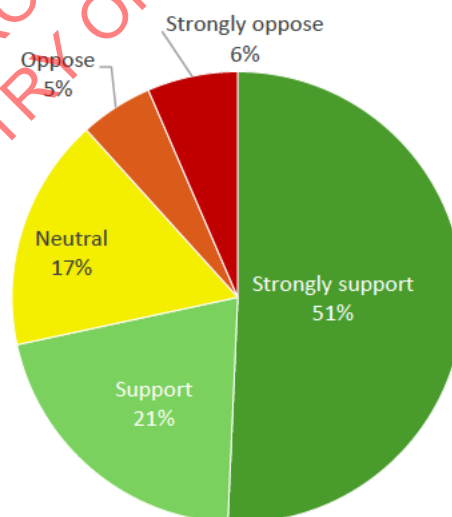
Those who opposed the proposal commonly felt it was too harsh. Some suggested it should apply to safety-related offences only, or that the threshold should be lowered but not halved.

Some submitters felt the current system works well or that the proposal would not change behaviour. Some suggested it would increase unlicensed driving and administrative burden.

Some organisations felt that without improvements to driver training and support, the proposal could be overly punitive. Others called for more education on the demerit system.

Many organisations felt the current demerit regime is inconsistent and suggested a wider review of the fines and penalties system to ensure demerits are proportionate to the offence before making changes to the demerit threshold.

Halving the demerit threshold for learner and restricted drivers



Introduce a zero-alcohol limit for learner and restricted drivers

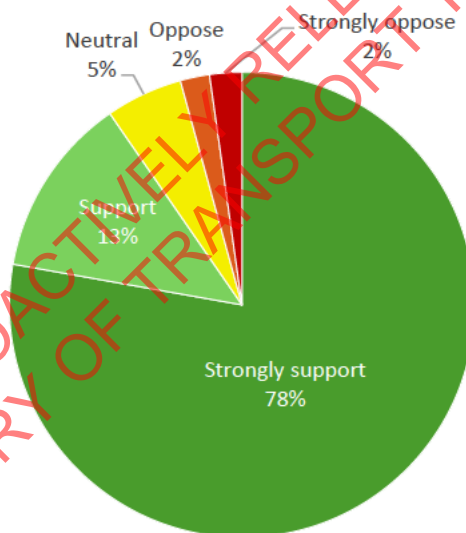
A total of 4118 submissions commented on this proposal. 91 percent supported or strongly supported, 4 percent opposed or strongly opposed, and 5 percent were neutral.

Individual submitters who supported the proposal felt alcohol is a significant contributor to unsafe driving and that this measure would send a strong signal to novice drivers. Some submitters said zero-alcohol limits should apply to all drivers.

Some submitters who did not support the proposal felt the current zero-alcohol tolerance for drivers under age 20 is appropriate and should not be expanded to novice drivers of any age. Some were concerned about residual alcohol levels. Others suggested one or two drinks would be unlikely to cause a crash.

Almost every organisation supported this proposal.

Zero-alcohol limit for learner and restricted drivers



Improve NZTA's oversight of approved advanced driver training course providers

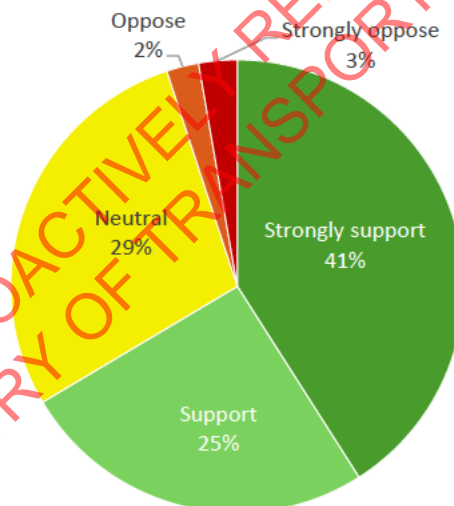
A total of 4093 submissions commented on this proposal. 66 percent supported or strongly supported, 5 percent opposed or strongly opposed, and 29 percent were neutral.

Submitters who supported the proposal commonly felt there should be more approved providers of advanced driver training courses, and that courses should have more emphasis on practical driver training. Some suggested courses should be compulsory.

Some submitters who opposed the proposal were concerned about NZTA's ability to oversee approved course providers. Others were concerned that the proposal would reduce the number and quality of providers.

Organisations generally supported the proposal.

Improve NZTA's oversight of approved course providers



Reduce the requirements for eyesight screening

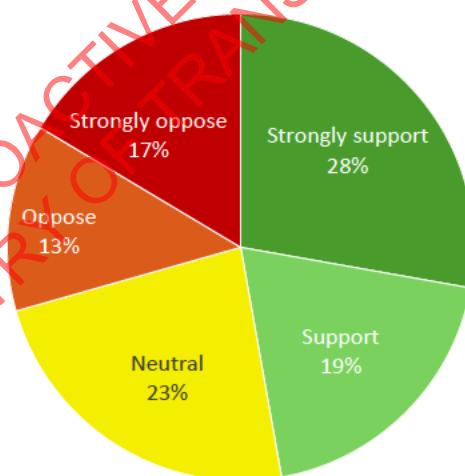
A total of 4103 submissions commented on this proposal. 47 percent supported or strongly supported, 30 percent opposed or strongly opposed, and 23 percent were neutral.

Individual submitters who supported the proposal felt younger people are unlikely to have eyesight issues and that repeated testing is unnecessary. Some felt the screenings were more appropriate for older drivers or drivers with pre-existing vision impairments. Some felt that testing agents are unqualified to detect vision impairments.

Individual submitters who opposed the proposal felt that the current requirements are important for safety and should not be reduced. Some submitters felt people are not very good at noticing changes in their vision. Some were concerned about fraud when signing a declaration.

Organisations gave input on the proposal. Those who opposed felt the screenings were important for safety and some organisations supported it with some reservations. Optometrists and opticians who submitted generally opposed the proposal. These eyesight professionals noted eyesight can change at any age and said people are generally not very good at detecting the deterioration in their own vision.

Reducing the requirements for eyesight screening



Other matters

A number of individual submitters used the survey to express general views on driving and road safety, rather than the specifics of the proposal.

Many submitters gave feedback on other matters relating to driver licensing that were not consulted on, and some submitters advocated for new measures such as:

- Longer learner and restricted time periods
- Requiring logged, supervised driving hours, sometimes under variable conditions such as inclement weather and at night
- Requiring or incentivising professional driver training, sometimes with one hour counting for three hours of supervised driving
- Strengthening driver education to give drivers a greater understanding of vehicle physics
- Requiring 'R' plates for restricted licence holders
- Reviewing the content of the learner test to be more relevant to learning to drive
- Increasing funding for community-based driver licensing support programmes
- Improving access to mobile testing
- Online driver education and hazard perception testing
- Improving resources for parents or supervisors to improve the quality of teaching and learning
- Removing the time-discount associated with completing an approved advanced driver training course
- Requiring a theory or practical test at licence renewals

Senior drivers

Some submitters gave feedback on the licensing process for senior drivers. These submitters generally felt that the requirement for a medical check when renewing a licence is not strong enough, and that practical testing should be required as well.

Overseas licence conversions

Some submitters gave feedback on the process for overseas drivers to convert to New Zealand driving licences. These submitters generally felt that the testing process is not comprehensive enough, and could be strengthened by making overseas drivers sit the restricted licence test. Some submitters felt that overseas drivers should be required to undergo further driver education and testing, and sometimes an English language test, to convert their licence.

A small number of submitters commented that the supervisor condition between passing the theory and practical test should be removed.