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NZ Automobile Association submission on:

GDLS: Requirements for supervised driving hours for time reduction



SUBMISSION TO: NZ Transport Agency

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

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Contents

Executive Summary.....	4
1. Number of supervised driving hours (KC1).....	5
2. How learners complete their supervised driving hours (KC2)	5
2.1 Professional driver training	6
3. Logging supervised driving hours (KC3)	6
4. Requirements for logging supervised hours (KC4)	7
4.1 Paper-based pathway.....	8
5. Validating supervised driving hours (KC5)	8
5.1 Operational impacts	9
6. Additional recommendation	10
About the New Zealand Automobile Association.....	11

Executive Summary

The AA supports the intent of requiring learner drivers to complete supervised driving hours before being able to reduce their learner licence period. However, the AA believes the proposed system needs to be strengthened to ensure it delivers meaningful safety benefits and maintains public confidence.

The AA recommends that NZTA:

- retain the proposed 60-hour supervised driving requirement
- ensure the system encourages learners to gain experience in a range of driving conditions, including night driving, wet weather, higher-speed roads and high-traffic periods
- only allow paper-based recording of practice hours for learners with genuine accessibility, disability, connectivity or digital access barriers. Require the majority of learners to use a less easily manipulated digital app.
- adopt a centralised validation system for paper-based records, similar to the Queensland approach
- incentivise professional driving instruction through a capped multiplier (EG 1 hour of paid professional driver training is equivalent to 3 hours' lay supervision) or similar mechanism
- require the app and any approved paper-based record to capture the driving conditions experienced during each session
- position the digital app as the primary and preferred method for recording supervised driving hours
- retain GPS-based verification as a core feature of the app
- rename the paper-based "logbook" as a "Learner Driver Record of Supervised Practice Hours" or something similar to avoid confusion with commercially available products
- if frontline staff in licensing sites are required to perform in-person validation of practice hours, NZTA needs to provide the staff with clear information including acceptance rules, unacceptable scenarios, escalation paths, staff guidance and accountability settings
- complete a full operational impact assessment before implementation
- provide customer communications, staff training, visual aids, FAQs, scripts, process maps and system guidance well before go-live

The AA considers these changes are necessary to ensure the supervised hours pathway is not simply a compliance exercise, but a genuine opportunity to improve novice driver safety.

The system should encourage meaningful practice, support good supervision, incentivise professional instruction, provide a trusted validation system, and avoid placing unreasonable demands or risks on frontline licensing staff.

1. Number of supervised driving hours (KC1)

The AA accepts setting the required number of supervised driving hours at the maximum available threshold of 60 hours.

The AA supports the principle that learner drivers should complete meaningful supervised driving experience before being able to progress more quickly to a restricted licence.

The AA's primary concern is that supervised practice must provide a broad, meaningful and verified driving experience across a range of conditions. The safety benefits associated with supervised driving arise from the quality and diversity of the experience gained, including exposure to different road environments, traffic conditions, weather conditions and times of day, rather than solely the number of hours completed.

While consideration of higher minimum practice requirements is outside the scope of this consultation, the AA believes that 60 hours should be regarded as a minimum threshold for time reduction purposes rather than an indication of best-practice learner driver experience. Over time, increasing the quantity and quality of supervised driving experience should remain an important consideration in the ongoing development of New Zealand's graduated driver licensing system.

The AA also notes that many comparable jurisdictions require 100 to 120 hours of supervised driving as best practice for developing driving experience and reducing novice driver risk.

The AA does not support more complex options such as variable supervision requirements or proportional offsets. These would be harder for learners to understand and more difficult for NZTA and licensing agents to administer.

2. How learners complete their supervised driving hours (KC2)

The AA does not agree with an approach that places no requirements or expectations around learners gaining experience in a range of driving conditions.

The AA accepts that a highly prescriptive system could create practical difficulties for some learners. Certain driving environments, such as motorway driving or busy urban roads, are not available in all parts of the country. We also recognise that access to supervisors, geography, work commitments and household circumstances will vary significantly between learners.

However, the AA does not support an approach where all supervised hours are treated as equivalent, with no requirement or strong expectation that learners gain experience across different driving conditions.

The AA believes that, at the very least, the system should strongly encourage learner drivers to gain experience in a broader range of conditions before they begin driving solo. This should include

conditions that are generally available across New Zealand, such as driving in the dark, driving on higher-speed roads, driving in wet weather, and driving at higher traffic times. These experiences are important for building judgement, confidence and hazard awareness before a learner progresses to independent driving.

The AA recommends that both the digital app and any approved paper-based record should ask learners and supervisors to record the types of driving conditions experienced during each session. This could be done through simple checkboxes or prompts covering conditions such as night driving, wet weather, higher-speed roads, rural roads, and heavy traffic. This would not need to be overly complex, but it would help shift the system from simply counting hours to encouraging broader and better-quality driving experience.

The digital app should also provide guidance, prompts and staged recommendations to help learners and supervisors progress from simple environments to more complex ones. For example, the app could encourage learners to begin in low-speed, low-traffic environments before gradually building toward higher-speed roads, night driving, wet-weather driving and more complex traffic situations. This would retain flexibility while helping learners and supervisors understand what a well-rounded learning pathway looks like.

2.1 Professional driver training

The AA strongly believes that professional driver training should be incentivised for learners who want to fast-track their progress to a restricted licence.

The AA considers that time with a professional instructor provides significantly more value than with an untrained supervisor in terms of best-practice knowledge, safe driving skills and good driving habits. Professional instructors can help identify weaknesses, correct unsafe habits early, and provide structured guidance to both learners and supervisors about what should be practised between lessons.

The AA recommends that NZTA consider a capped multiplier for professional instruction. For example, a learner who completes five one-hour sessions with a qualified professional instructor could have those hours counted at three times their value. This would recognise 15 hours toward the 60-hour requirement, while still requiring the learner to complete a further 45 hours of supervised practice. This approach would incentivise professional instruction while still having extensive practice with a supervisor.

The AA considers this would provide a practical way to encourage higher-quality learning while still preserving the central purpose of the supervised hours requirement.

3. Logging supervised driving hours (KC3)

The AA generally agrees with the proposed information requirements, but recommends that NZTA also capture information about driving conditions and professional instruction.

The AA supports the proposed requirement for learners and supervisors to record the date of each driving session, start and finish times, total minutes driven, vehicle registration, odometer readings, supervisor details and supervisor sign-off. These details provide a reasonable foundation for verifying that supervised driving has occurred.

However, the AA recommends that NZTA go further by requiring learners and supervisors to record the conditions experienced during each driving session. This should include, at a minimum, whether the session involved night driving, wet weather, higher-speed roads, rural roads, urban traffic or heavy traffic.

The AA also recommends that professional driving instruction be recorded separately within the app and any approved paper-based record. This should include the name of the instructor, provider, date and duration of the lesson. If NZTA adopts an incentive or multiplier for professional instruction, this information will be necessary to support the integrity of that approach.

The AA also recommends that NZTA avoid using the term “logbook” for the paper-based option. This term risks confusion with commercially available logbook products, court-ordered logbooks, or commercial driving logbooks. A clearer name, such as “Learner Driver Record of Supervised Practice Hours”, would help reduce the risk of learners purchasing or using the wrong product.

4. Requirements for logging supervised hours (KC4)

The AA strongly supports a digital-first approach and believes the digital app should be the primary and preferred way of recording supervised driving hours.

The AA supports NZTA’s proposal to provide a digital app for recording supervised driving hours. A well-designed app offers significant advantages over a paper-based system, including a better user experience, reduced risk of lost records, stronger verification, lower administrative burden and greater confidence that recorded hours are genuine.

The AA strongly supports the use of GPS functionality within the app. GPS-based recording would provide an important safeguard by helping confirm that logged sessions occurred in a moving vehicle on the road. It would also allow key information, such as time and location, to be captured automatically, reducing the burden on learners and supervisors and improving the quality of the record.

The AA believes the app should be more than a passive recording tool. It should actively support better learning by prompting learners to gain experience in a range of driving conditions, tracking progress toward a well-rounded set of experiences, and providing guidance to both learners and supervisors about how to build skills safely over time.

4.1 Paper-based pathway

The AA accepts that a paper-based pathway may be necessary for a small number of learners who cannot reasonably access or use a digital app. However, the AA does not believe the paper-based pathway should be available as an unrestricted choice for any learner who simply prefers it.

The AA recommends that NZTA establish clear eligibility criteria for using a paper-based record. The paper-based option should be limited to learners with genuine accessibility, disability, connectivity or digital access barriers. This would help ensure the vast majority of learners use the superior digital system, where verification is stronger and the user experience is likely to be better.

For any paper-based record, NZTA should ensure the requirements are standardised nationally and that the paper-based process is not easier, faster or less robust than the digital app. A paper pathway with weaker safeguards would create a clear risk that some learners may choose it because it is easier to manipulate or less likely to be properly verified.

For this reason, the AA recommends that the paper-based option be clearly positioned as an exception pathway, not as an equal alternative to the digital app.

5. Validating supervised driving hours (KC5)

The AA does not support the proposed validation requirements and believes they do not go far enough to ensure the integrity of the supervised driving hours pathway.

The AA has significant concerns regarding the proposed approach to validating paper-based records of supervised driving hours. NZTA's proposal would require learner drivers and a nominated supervisor to attend a licensing agent in person, verify their identities and declare that the information in the record is accurate.

While declarations and identity checks may deter some deliberate falsification, they are unlikely to provide a sufficiently robust mechanism for confirming that 60 hours of supervised driving have genuinely been completed. The success of this policy depends on learner drivers actually undertaking meaningful supervised practice. If learners are able to falsely declare hours that were not completed, the safety benefits expected from these reforms will not be realised.

The AA is concerned that a weak verification process would undermine both the intent and credibility of the new system. It would send a problematic message to new drivers that compliance with driving rules is optional and that requirements can easily be cheated. This would be particularly concerning given that these reforms are intended to improve safety outcomes and develop responsible driving behaviours from the beginning of a person's driving journey.

The AA strongly recommends that NZTA adopt a centralised validation system similar to the approach used in Queensland, Australia. Under this type of model, paper-based records would be submitted to a central authority for assessment before a learner becomes eligible to book a restricted licence test. If the record is accepted, the learner can proceed to the next step. If the

central authority has concerns about the validity or completeness of the record, those concerns can be addressed before the learner and supervisor arrive at a testing or licensing site.

The AA considers this approach would provide a much better balance between integrity, consistency and frontline staff safety. It would allow validation checks to occur away from public-facing counters, support more consistent decision-making, provide greater opportunity for follow-up where required, and avoid situations where learners are turned away in person after arriving for a test appointment.

The AA also recommends some form of validation of supervisor eligibility at the start of the process, rather than only relying on declarations at the end. This would reduce the risk of learners completing hours with someone who later turns out not to meet the requirements.

5.1 Operational impacts

The AA has serious concerns about the operational impacts of in-person validation of paper-based records at testing centres or licensing agent counters.

The AA strongly believes NZTA should adopt a centralised validation system for paper-based records. However, if NZTA chooses to proceed with in-person verification of supervised hours at testing centres or licensing agent counters, NZTA must provide clear, comprehensive and nationally consistent information before implementation.

At a minimum, NZTA must provide:

- clear acceptance rules and criteria for paper-based records
- a detailed list of scenarios where a record of supervised driving hours would not be acceptable
- examples of complete and incomplete records
- guidance on how missing, illegible, inconsistent or incorrect information should be handled
- clear rules on whether staff are expected to complete a visual completeness check, recalculate hours, check signatures, assess authenticity, validate supervisor details or identify possible fraud
- escalation paths for disputed or uncertain cases
- clear accountability for compliance decisions
- customer-facing wording for explaining why a record cannot be accepted
- staff guidance for managing difficult conversations and health and safety risks.

As a provider of licensing services, we can see significant issues with the proposed paper-based validation process. These include additional transaction time, queue impacts, incomplete or unclear records, illegible handwriting, uncertainty about supervisor eligibility, uncertainty about overseas licence histories, and possible expectations that staff detect fraudulent or inconsistent signatures.

These are not minor implementation details. If a learner records many short driving sessions, frontline staff could be required to review a very large number of entries. This could materially increase transaction times and place pressure on centres, smaller agencies, mobile units, remote communities and other licensing services.

The AA is particularly concerned that frontline staff may be placed in an unreasonable and potentially unsafe position if they are expected to tell a learner driver and supervisor, in person, that their record of hours is not acceptable and that they cannot proceed. Customers may have taken time off work, travelled to a testing or licensing location, arranged for the supervisor to attend, or expected to be able to continue with the next stage of licensing. If their record is rejected at the counter, this creates a foreseeable risk of frustration, confrontation and health and safety concerns for frontline teams.

The AA therefore recommends that NZTA complete a full operational impact assessment before implementing any in-person paper-based validation process. This should include transaction time analysis, resourcing impacts, queue impacts, training requirements, funding implications, impacts on small agencies, impacts on mobile and regional services, and readiness across all parties involved in the licensing process.

NZTA should also provide an end-to-end process walk-through/training sessions with AA and other delivery partners. This should cover the customer journey, centre workflow, restricted test booking process, system steps, scanning and record retention requirements, audit requirements, exception handling and escalation pathways.

6. Additional recommendation

A number of current learner drivers will be wanting to sit their restricted licence test shortly after the new rules come into effect in January 2027, using the shortened timeframe.

The AA recommends that NZTA urgently provide clear public guidance for learners wanting to begin recording supervised driving hours before the final digital app or approved paper-based process is available.

Without clear interim guidance, learners may start using inappropriate or commercially available products, arrive at centres with the wrong evidence, or be confused about what will be accepted.

Unless guidance is quickly provided there is the potential for frustration and disputes from learner drivers and their whanau over their ability to sit a restricted test quicker than a 12-month period.

About the New Zealand Automobile Association

The NZAA is an incorporated society with over 1.1 million Personal Members who belong to the Association, as well as over 1 million business vehicle relationships, representing a large proportion of New Zealand's road users.

The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport users as well as private motorists.

Across New Zealand, drivers regularly come into contact with the AA through our breakdown officers, 38 AA Centres and other AA businesses. Meanwhile, 18 volunteer AA District Councils around New Zealand meet each month to discuss local transport issues. Based in Wellington and Auckland, our professional policy and research team regularly surveys our Members on transport issues, and Members frequently contact us unsolicited to share their views. Via the AA Research Foundation, we commission original research into current issues in transport and mobility. Collectively, these networks, combined with our professional resource, help to guide our advocacy work, and enable the NZAA to develop a comprehensive view on mobility issues.

Motorists contribute over \$5 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. This money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, and Police enforcement activity. On behalf of AA Members, we advocate for sound and transparent use of this money in ways that improve transport networks, enhance safety, and keep costs fair and reasonable.

Our advocacy takes the form of meetings with local and central government politicians and officials, publication of research and policy papers, contributing to media on topical issues, and submissions to select committees and local government hearings.

Total Membership

Over 1.1 million are Personal Members

Over 1 million are Business Vehicle relationships

% of licenced drivers

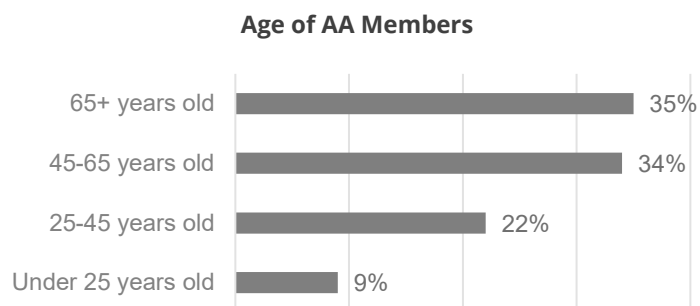
At least 29% of licensed drivers are Personal AA Members
(based on Class 1 licences for cars and light vehicles)

Gender split

54%	Female
45%	Male
1%	Unknown



Age range & Membership retention



53% of AA Members have been with us for over 10 years.
