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NZ Automobile Association submission on:

Proposed improvements to NZ's Graduated Driver Licensing System



SUBMISSION TO: Ministry of Transport

REGARDING: Improvements to NZ's Driver Licensing System

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Introduction

The New Zealand Automobile Association (AA) welcomes the opportunity to provide feedback on the Government's proposed changes to the Graduated Driver Licensing System (GDLS). We acknowledge the intent behind the proposals to improve access to driver licensing while maintaining road safety outcomes.

This submission has been prepared by the AA's Transport Policy & Advocacy team (which advocates on behalf of NZAA Members for better and safer transport) with input from the AA's Driving School (which provides professional driver training) and the AA's Government Contracts team (which delivers licensing services to drivers on behalf of the NZ Transport Agency).

It has been 14 years since the last substantial review of New Zealand's driver licence system. The learning to drive process sets lifetime foundations for attitudes, knowledge and behaviour on our roads. It has a huge impact on our road safety and opportunities for change do not come often so the AA urges the Government to take this chance to introduce changes which will start lifting New Zealand to a higher level of driver skills and safety.

Executive Summary

The AA has long advocated for a licensing system that balances accessibility with robust safety standards. We believe the Government's primary focus when considering altering the driver licence system should be on changes that will lead to better prepared and safer drivers.

The AA supports several of the changes being proposed as positive steps forward. However, **we believe that there are more changes that should be added** to help bring down our tragically high rate of crashes and deaths among young drivers.

These additional changes are based on work done by the AA Research Foundation in 2024 (attached alongside this submission) that investigated differences between the New Zealand driver licence system and similar countries globally. That research identified measures proven to reduce crash rates and improve road safety.

We strongly support the introduction of a zero-alcohol limit for anyone holding a learner or restricted licence regardless of age.

We also support lowering the demerit point threshold to 50 for learner and restricted licence holders.

We support the principle of stronger consequences for breaking the rules while a novice driver but see alternative options to achieve this from the way proposed.

We understand the desire to reduce unnecessary barriers to obtaining a licence and believe it could be possible to remove the on-road driving test for a full licence in New Zealand while maintaining standards for safety. However, **it is essential that the removal of that test be balanced by stronger requirements during the learner phase** to ensure drivers are gaining sufficient experience and skill development before they begin driving solo.

Why changes are needed

New Zealand has one of the highest rates of road deaths in the developed world.

Our young people die in crashes more frequently than other age groups. 16-24 year olds have a 50% higher rate of road deaths than those aged 25+.

Most importantly, **if New Zealand had the same rate of road deaths among our young people as Australia, we would have about 20 fewer deaths each year.**

Since the last significant changes to our driver licence system in 2011 there has been considerable work done in New Zealand to create safer roads, to have more effective enforcement and there continues to be ongoing advances in vehicle safety technology.

All of these are good things but the area authorities have not progressed in improving our standard of driving.

The Government has an opportunity with this review to implement changes that could save many lives and prevent many injuries every year, as well as greatly reducing the costly damage to vehicles and property from crashes. We believe this can be achieved while also delivering the Government's goal of people being able to gain a licence for less cost.

New Zealand currently has about 93 deaths, 606 serious injuries and 3252 minor injuries a year from crashes where a young driver was at fault. If we assume the same rate of crash involvement for non-injury crashes, there could also currently be about 6200 non-injury crashes a year where a young driver was at fault.

International experience has shown crash reductions of between 10-20% occur after extensions to the learner licence period as well as minimum required hours of supervised practice for learner drivers.

If we conservatively estimated that introducing similar requirements in New Zealand would lead to a 10% reduction in crashes where young drivers were at fault, **this could mean 9 fewer deaths, 60 fewer serious injuries, 325 fewer minor injuries and 620 fewer non-injury crashes a year on our roads.**

Using official social cost figures for different types of crashes, we calculate that a 10% reduction in crashes where young drivers are at fault **would equate to \$200m in savings to the country per year.**

Specific changes: Removing the full licence test

The consultation document states that: "Most countries do not have a full test but often impose tougher restrictions or lower offence thresholds for drivers on learner and restricted licences."

This is true but what should also be added is that **most countries have a longer learner licence period than New Zealand as well as requirements for either a minimum number of hours practice driving with a supervisor or a minimum amount of professional training that drivers must complete before they can sit their on-road driving test.**

If the full licence test is removed, it is critical that the system compensates with stronger requirements earlier in the licensing journey. Without this, we risk undermining the safety benefits that the GDLS has delivered since its introduction.

An investigation by the AA Research Foundation in 2024 showed that all the other countries examined required learner drivers to complete more work and practice to obtain a licence than New Zealand currently does. The research identified a range of actions used in similar countries to New Zealand that had strong evidence of delivering reductions in crashes among young drivers.

The AA could support the Government removing the full licence test if the following changes were added:

i. Increase the learner licence period from 6 to 12 months for young drivers

Most countries similar to New Zealand have at least a 12 month period where learners can practice and develop their skills with supervising drivers or professional instructors before being able to drive solo.

We believe making the learner period 12 months would result in many younger drivers spending more time gaining experience on the roads and be better prepared for the shift to driving alone.

Research has shown that human brains tend to have better risk-assessment and awareness of consequences from the age of 25 and crash rates drop substantially at this point, so we believe that the current learner licence period of 6 months could remain for drivers aged 25+.

ii. Requiring 60+ hours of supervised driving practice on a learner licence

Many countries similar to New Zealand have introduced a system where drivers are required to officially record hours of practice. They must complete a certain number of hours (and frequently in a range of conditions) before they can sit the test for the next stage of licence.

The AA Research Foundation surveyed 1000 drivers under the age of 25 earlier this year and half the respondents estimated they had done fewer than 40 hours of practice before their restricted test, with 17% fewer than 15 hours.

The AA recommends the introduction of **a mandatory minimum of 60 hours of supervised driving practice during the learner phase**. Achieving this amount of practice would effectively **require two 35-minute practice drives a week over a 12-month learner period**.

An app/online portal could be the primary way for drivers to record this, creating opportunities to use technology to boost the learning to drive experience. We expect that the majority of learners would use the app but there would need to also be alternative options for recording practice hours for those unable to do so.

The app could provide information and examples of real-world driving situations as learners progress, helping increase knowledge of driving in different environments. For example, driving at night, in wet weather, in busy urban environments and on rural roads, etc.

A 2015 Austroads study reviewing multiple aspects of graduated driver licence systems internationally indicated a reduction of about 20% in crashes where young drivers were completing between 30-80 supervised practice hours.

A 2017 VicRoads evaluation of changes to Victoria's driver licence system that introduced requirements for 120 hours of practice found an 18% reduction in fatal and serious injuries among 18–23-year-olds.

iii. Incentivising professional driver training

The AA proudly believes in the benefits that learners gain from having professional training.

Removing the full licence test would lessen the opportunities for novice drivers to have an expert outsider evaluate their driving and identify improvement opportunities or bad habits.

This could be balanced by introducing incentives to encourage learners to use professional training.

We propose that lessons or accredited courses should accelerate progress to a learner's required 60 hours of supervised practice.

For example, for every hour spent with a qualified instructor, learners could receive credit for three hours of practice. Under this system, completing 10 hours of learning with a professional would count as 30 hours toward the required total – accelerating skill development while ensuring better-prepared drivers on the road.

Approaches similar to this are widely used overseas, recognising that professional driving instruction provides learning experiences well beyond standard supervised practice. Trained instructors offer expert guidance, structured lessons, and real-time feedback, helping learners develop better understanding and safer driving habits behind the wheel.

iv. New approach to hazard perception testing

The AA sees opportunities to use hazard perception testing in a potentially more effective fashion than currently if the full licence test is removed.

A workable option would be to add a hazard perception test into the requirements when a learner completes their theory test – which is the approach taken in Australia. If this approach was taken, we favour an electronic test with clear correct or incorrect answers. This would remove some of the subjective judgements and communication challenges that a verbal test can create.

However, our preference would be for a more innovative approach which we see as having greater potential to improve learner drivers' knowledge. If learners are using an app to log practice hours as we would like to see, a number of 'hazard perception' modules could be required to be completed at different points as they progress towards 60+ hours.

These could cover different environments and situations to help learner drivers think about a wider range of conditions and how to respond to them than before they experience them in the real world.

Specific changes: Clean-driving record in restricted licence stage

The Government has proposed that if a restricted licence holder commits a driving offence, the length of time would be extended before they can progress to a full licence.

The AA supports the idea of tougher non-financial penalties for drivers breaking the rules while on a learner or restricted licence to encourage our highest-risk drivers to stick within the rules.

We believe these penalties should be focussed on offences in the highest-risk areas of drunk/drugged driving, cellphone use, speeding, seatbelts, dangerous/careless driving and disqualified or unlicensed driving.

We have some **questions over whether the proposed approach is the best way to motivate drivers to obey the rules and believe it needs further consideration.**

Ensuring consistency of penalties is one area that we think needs to be looked at. In a scenario where a driver had been on their restricted licence for 17 months and was just about to progress to a full licence, they could effectively suffer a 17-month penalty for a low-level speeding offence. Meanwhile, a driver that had only held their restricted licence for 1 month and was caught dangerous driving and not wearing a seatbelt would effectively only suffer a one-month penalty on their eventual progression to a full licence.

Speeding is the most commonly detected offence where drivers are breaking the rules but there would be uneven consequences here with the current proposal. A restricted licence holder driving their parents' car and being caught by a speed camera would often not face the extended time penalty while a restricted licence holder in their own vehicle would. This is because speed camera offences are assigned to the registered owner of the vehicle.

This could lead to perverse outcomes with some young drivers feeling unfairly punished compared to others and almost certainly some avoidance of the extended time penalty by getting a family member or friend to take liability for speed camera offences.

We also have some concerns that the time-extension penalty may not be seen as much consequence by some drivers, meaning it does not provide enough motivation to change behaviour.

An alternative approach that the AA would like the Government to consider would be **drivers who maintain a clean-driving record while on a restricted automatically progress to a full licence while those who commit certain higher-risk offences face an on-road driving test to achieve their full licence** like in the current system.

We believe the motivation to avoid a second test would be a more powerful incentive to stick to the rules.

Finally, if the full licence test is removed and a clean-driving record becomes a core part of progression to a full licence, the AA believes **the restricted licence period could be extended from current requirements**. A 2-year period on a restricted licence (or 18 months for those who have completed an advanced driving course) would provide a longer window of time for novice drivers to have to be extra vigilant at obeying the rules.

Specific changes: Halving the demerit threshold

The AA supports this change.

As the consultation paper states, it is common practice internationally to have tougher restrictions or lower offence thresholds for drivers on learner and restricted licences.

A level of 50 demerit points would still mean drivers on a restricted licence would have to commit two or more of most offences to reach the threshold where they are disqualified from driving.

A system where novice drivers who have been caught breaking the rules once know that another offence would have strong consequences seems a reasonable threshold.

The AA sees enforcement as an important part of ensuring most drivers follow the rules but want to emphasise the point that more than just enforcement will be needed to deliver meaningful improvements in road safety.

To back up this point, data recently sourced by the AA Research Foundation shows that offences among young drivers have dropped substantially from a decade ago. This is a great outcome and there has also been a reduction in the rate of road deaths among young people over the same period.

	15-19 year old licenced drivers	Road deaths per 100,000 licenced young drivers	Total traffic offences	Drunk/drugged driving offences	No seatbelt offences
2013	142,159	22.5	121,237	4019	5844
2023	192,416	19.7	106,357	2712	4564
2024	204,285	16.6	102,022	2448	3938

However, 15-19 year olds die in crashes at a rate that is still 50% higher than for individuals over 25 and significantly higher than in other countries.

In our view this data illustrates why **the Government needs to be looking at additional changes to the driver licensing system beyond solely enforcement** if we are to lower the tragically high crash rates among young people.

Specific changes: Zero-alcohol limit until full licence

The AA strongly supports this change.

Specific changes: NZTA's oversight of course providers

The AA supports the intent of this change to have more rigour around ensuring advanced driving courses are being delivered to high standards. As a current provider we have complete confidence in our courses and training being of the highest professional standards.

However, the consultation has provided limited information on what this change would mean in real terms so we would need more detail to conclusively support specific changes or not.

One concern we would have is ensuring the system is balanced so effective 'oversight' does not use up resources that prevent or slow down innovation and progress.

More information would also be needed to provide confidence that the group tasked with overseeing such courses have the experience, knowledge and resources to be able to do the role effectively.

Specific changes: Reduced eyesight testing requirements

The AA recognises the Government's desire to enable online applications and renewals of driver licences.

However, **we do not feel that enough information has been provided in the consultation to support the proposal of only having a vision test upon someone's first licence application then at age 45 and age 75.** No details have been provided on why those ages would be the optimum frequency for vision testing or the expected safety implications of the proposed changes.

We have not surveyed on this issue since 2015 but at that time 73% of AA Members were opposed to the removal of vision testing every 10 years at licence renewal, indicating that much of the public see benefits in the current approach.

The AA is not an expert in the area of visual changes and deterioration, so believe the Government should be seeking advice from optometrists before contemplating any changes.

The length of time between tests should be guided by the ages where visual changes are most likely to occur in drivers together with the impacts of those changes on a person's ability to drive safely.

Additional recommendations

i. Review any changes made after 3 years

The AA would like the Government to commit to a review of the impact of any changes made to the graduated driver licence system within three years of implementation. This will ensure that the reforms are achieving their intended outcomes and allow for adjustments if unintended consequences arise.

ii. Also consider changing requirements for Overseas Licence Conversions

While overseas licence conversions are not the focus of this consultation, there is a common sentiment among those connected to driver licensing in New Zealand that it should be part of considerations for changes to improve safety.

The proposal from the Government would see New Zealand drivers who learn here only doing one on-road driving test to gain a full licence. This is the restricted licence test, which is the more thorough and longer test of the two currently required.

For the overseas drivers who require an on-road driving test to convert to a New Zealand licence it would make sense for the test they sit to be the restricted licence test as it would better ensure that everyone's driving skills are at the desired standards.

Survey results on driver licensing issues

The AA surveyed our Members Panel twice in January 2025 with questions relevant to changes to the driver licence system.

The two surveys received more than 2300 and 2600 responses respectively.

Key results:

- **83% of respondents supported a zero blood-alcohol limit** for all learner drivers. 9% were opposed or strongly opposed.
- **73% supported learner drivers getting higher fines and penalties** if they were caught driving unsafely, e.g. speeding. 11% were opposed.
- 67% supported drivers being able to progress to their Full licence faster if they had no demerits. 14% were opposed.
- Younger respondents (between 18 and 34 years) did not differ from the other age groups in their views. This is encouraging, as they would be most affected by any changes to the licensing schemes.

The AA Research Foundation also recently commissioned an independent research firm to survey 1042 drivers under 25 years of age about their experiences learning to drive and since gaining a licence.

Key results:

- 35% of young drivers had been in a crash in the last five years
- When asked how many hours practice with a supervising driver they did before gaining their restricted licence, half estimated it was less than 40 hours.

0-15 hours	16-40 hours	41-80 hours	81-120 hours	120+ hours
17%	32%	22%	14%	11%

Summary of Recommendations

The AA believes that with the right combination of measures, New Zealand can continue to improve road safety outcomes while making the licensing system more accessible and effective.

Our positions are:

- Caution against removing the full licence test without strengthening earlier stages of the GDLS.
- Recommend extending the learner licence period to 12 months.
- Recommend requiring a minimum of 60 hours of supervised driving practice.
- Recommend incentivising professional driving lessons or courses.
- Recommend extending the length of the restricted licence period.
- Support a zero-alcohol limit for learner and restricted licence holders
- Support halving the demerit point limit for learner and restricted licence holders
- Support the intention of the time-extension for offences while on a restricted licence but believe further work is required on the most effective approach to incentivise new drivers to obey the rules
- Recommend a formal review of the changes within three years of implementation.
- Recommend changing the on-road driving test that people converting an overseas licence currently undertake

We appreciate the opportunity to contribute to this important consultation and look forward to ongoing engagement on this issue.

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 memberships, 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, 36 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 advocacy 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.

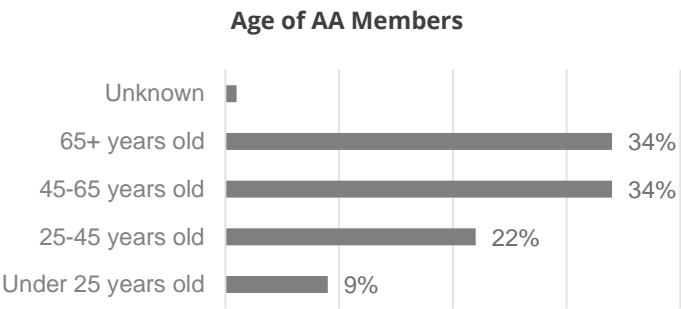
Motorists contribute over \$5 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. This money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, 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.

AA reach	More than 1.1 million Personal Members	
	More than 1 million vehicles covered by business relationships	
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% of licenced drivers	At least 29% of licensed drivers are Personal AA Members (based on Class 1 licences for cars and light vehicles)	
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Gender split	54%	Female
	46%	Male
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Age range & Membership retention



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