

3 June 2025

TTP0402
2025 AM: MR

NZ Transport Agency Waka Kotahi
By email to: GDLS@transport.govt.nz

Tēnā koe,

SUBMISSION: PROPOSED IMPROVEMENTS TO NEW ZEALAND'S GRADUATED DRIVER LICENSING SYSTEM

Thank you for the opportunity to provide comment on the proposed changes to the Graduated Driver Licensing System (GDLS). This submission is made by transport staff on behalf of Horizons Regional Council who hold responsibility for coordinating and implementing road safety initiatives across the Manawātū-Whanganui region.

The New Zealand driver licensing system is designed to make sure everyone driving on our roads possess the necessary skills and knowledge to drive safely.

We recognise the current GDLS requires modification to improve the accessibility for obtaining a driver licence and strengthening the skills to drive safely.

The consultation materials indicate that the government's proposed changes aim to enhance the efficiency of the system by making it easier and more affordable for individuals to obtain a licence, all while ensuring road safety is upheld.

The aim of making the licensing process 'cheaper and easier', while also equipping drivers with the skills needed for safe driving, is not sufficiently met by the limited changes proposed. The measures proposed are narrow and fail to address the widespread barriers and deficiencies present in the current GDLS.

The proposed changes focus only on test costs and test anxiety as challenges, overlooking other critical barriers like language, literacy, proximity to testing locations, access to a legal vehicle, or a licensed adult to provide instruction, all of which hinder progress through the system.

By overlooking non-regulatory changes to the system, the focus of the proposed changes remains unreasonably narrow and fails to consider the complexities involved. The proposed changes limit the potential for meaningful improvements to the licensing system. Additionally, the government's requirement to implement these packages by 1 July 2026, does not allow for substantial enhancements.

We are also concerned the proposed changes may eliminate safety checkpoints and shift the focus toward punitive measures and administrative convenience. This could potentially weaken the licensing system, especially in the absence of a clear commitment to investing in driver education and on-road training. The changes are overly simplistic and make assumptions without providing the necessary evidence to demonstrate that they will achieve the intended outcomes.



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While we support the Ministry of Transport's efforts to improve the current system's effectiveness, we believe that the proposed changes are inadequate and caution that they may lead to unintended consequences that do not align with the government's original objectives.

Specific feedback on the proposed changes to the GDLS has been split into each area where changes are proposed.

1. Remove the full test

The consultation document highlights that there is limited research on the effectiveness of the full test. This is concerning, as it is difficult to advocate for removing the test when there is insufficient information on its ability to achieve the desired outcomes.

While we do not oppose the removal of the full licence test, we believe it should only occur if adequate safeguards or mitigation measures are put in place. This could include introducing a hazard perception assessment and offering more comprehensive driver education and lesson support.

The current requirement for the full test could be successfully replaced with an alternative approach, such as tracking driver instruction hours, as suggested by the Automobile Association NZ, alongside enhancing the restricted driving test.

The way the practical restricted licence test is modified will play a critical role in determining whether the proposed changes to testing improve, maintain or reduce road safety.

We endorse the adoption of a new system that includes recognising supervised driving practice hours, as seen in other countries.

Simply replacing the full licence test with a good behaviour period and increasing penalties by lowering the demerit threshold will not necessarily lead to better drivers and could potentially increase the risk of crashes. Removing the full test without requiring proof of knowledge and experience is a shortcut that may put lives at risk.

2. Introduce a clean driving record requirement to the restricted licence

Not being caught breaking the law does not necessarily mean you are a safe driver.

We do not support this approach, as it allows for system manipulation and provides a passive pathway to becoming a full licence holder. The GDLS is designed to provide learner drivers with supervision and a controlled environment in which they can develop their driving skills.

The clean driving record requirement is likely to lead to unintended consequences, where learner drivers may manage their driving hours and experience to avoid detection. This could discourage them from gaining essential experience, instead rewarding those who avoid getting caught or those who drive infrequently. Additionally, it could result in inconsistent standards across the country, depending on local enforcement levels.

What is missing is a clear, evidence-based approach that ensures drivers are properly supported in their learning journey from the outset.

Additional driving practice as a learner is recognised as a key factor in enhancing a driver's preparedness for independent driving. To address safety concerns, we support extending the minimum learner period.

We recommend prioritising driver education, introducing a minimum requirement for supervised on-road hours for learners, and investing in community-based training programmes that specifically benefit disadvantaged, rural, and high-needs communities.

3. Reduce the demerit threshold for novice drivers to have their licence suspended

This change sends the wrong message to learner drivers by encouraging them to focus on avoiding demerit points rather than gaining valuable driving experience. It also unfairly penalises learners based on when demerit violations occur within the restricted period.

We are concerned that the current demerit points system doesn't align well with the actual risk involved. There are inconsistencies in how points are assigned. Before reducing demerit point thresholds, there should be a review to ensure penalties reflect the appropriate level of risk and penalise behaviours that truly put lives at risk.

4. Introduce a zero-alcohol limit for novice drivers

We support this proposed change because it provides a clear and consistent message to all novice drivers. By applying the same rules to everyone, it eliminates any confusion that may arise from having different limits based on a driver's age. We also urge that other forms of impaired driving, such as drug use, be considered.

5. Improve NZTA's oversight of approved advanced driver courses

We are concerned that the NZ Transport Agency may not have the resources to effectively carry out this function. The Agency's responsibilities are expanding, and we are unsure if it remains adequately resourced to meet these additional demands. If this policy is to be implemented, it must be properly funded and not treated as an additional burden on the Agency.

Proper checks and measures need to be established to ensure that any training and driving practice requirements meet the necessary standards.

6. Reduce the number of vision tests

The evidence presented in the consultation materials suggests that reducing the number of eye tests will not significantly affect safety, as the current eye exam offers limited value. However, we believe that self-declaration is neither an accurate nor an appropriate method for managing risks. We recommend implementing a more effective test, such as a 'visual field of view' test, at key intervals for all drivers.

We also support the digitisation of the licensing system to lower costs and administrative burdens, and we endorse expanding access to digital learning and testing platforms across the country.

7. In summary

The current driver licensing system in New Zealand needs meaningful reform to both improve accessibility and strengthen road safety. While the government aims to make the system easier and more affordable, the proposed changes are too narrow and fail to address key barriers such as language, access to instruction, and broader social inequities. There is concern that focusing only on reducing test costs and anxiety oversimplifies the problem and could undermine safety without proper investment in education and support.

Key Points:

Full Licence Test Removal: While not opposed, its removal must be backed by strong safeguards, such as hazard perception tests and required supervised driving hours. Simply replacing it with a "good behaviour" period and lower demerit thresholds is inadequate and risky.

Clean Driving Record for Progression: This is not supported as it may encourage minimal driving to avoid penalties, leading to underprepared drivers. A more effective approach would include extended learner periods and mandatory supervised driving.

Lower Demerit Threshold: Reducing the demerit point threshold could unfairly target novice drivers without ensuring safer outcomes. A full review of the system is recommended before such changes.

Zero-Alcohol Limit: Supported for its clarity and consistency across all novice drivers.

NZTA Oversight of Courses: Concerns exist about whether NZTA has the capacity to manage expanded responsibilities. Oversight must be properly funded and standards maintained.

Fewer Vision Tests: While the current tests have limited value, replacing them with self-declaration is inappropriate. A more effective visual field test should be introduced.

This submission highlights the need for a more holistic and evidence-based approach, focusing on driver education, equity in access, and adequate system support. It cautions against quick fixes that prioritise administrative ease over meaningful safety outcomes.

We welcome any feedback or questions of clarification. In this instance, please contact Mark Read, Transport Services Manager on 0508 800 800 or by email at transport@horizons.govt.nz.

Yours sincerely,



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