

Insurance Council of New Zealand

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Rules Team
Waka Kotahi NZ Transport Agency
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To whom it may concern,

**Insurance Council of New Zealand submission on the Proposed Land Transport
(Driver Licensing) Amendment Rule (No 2) 2021**

Thank you for the opportunity to submit on the proposed Land Transport (Driver Licensing) Amendment Rule (No 2) 2021.

The Insurance Council of New Zealand (ICNZ) represents general insurers that insure about 95 percent of the New Zealand general insurance market, including about a trillion dollars' worth of New Zealand property and liabilities. ICNZ members provide insurance products ranging from those usually purchased by individuals (such as private motor vehicle insurance, home and contents insurance & travel insurance,) to those purchased by small to large businesses (such as commercial motor insurance, product and public liability insurance, professional indemnity insurance, commercial property, and directors and officers insurance).

The Insurance Council of New Zealand has reviewed the proposed Land Transport (Driver Licensing) Amendment Rule (No 2) 2021.

The Insurance Council has some concerns with the proposed amendment rule that will effectively turn back the clock on the effectiveness of the Graduated Drivers Licensing system in improving our road safety by removing the present 5-year time limits and reinstating the pre 2014 Amendment Rule allowing a 10-year limit for learner and restricted class 1 & 6 license holders to graduate to a full driver's license.

Waka Kotahi NZ Transport Agency says that the main reason for this change is to remove a number of accessibility barriers.

The Insurance Council see the Waka Kotahi NZ Transport Agency identified accessibility barriers as less significant compared to the wider road safety issues with drivers that do not know the road rules and have not learnt the skills necessary to operate a motor vehicle safely on New Zealand roads. This will intuitively lead to increasing accident numbers.

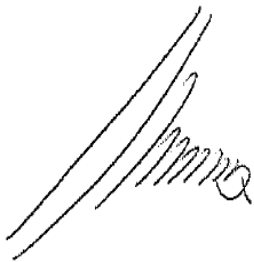
The Insurance Council recommends that the present 5-year time limits of the graduated drivers licensing system be retained to promote the need for learner and restricted license

holders to gain the knowledge and skills required to obtain a full driver's license in the shortest amount of time.

Reverting to the 10-year limit for learner and restricted class 1 & 6 license holders to graduate to a full driver's license degrades the New Zealand driver licensing system. Some learner and restricted license holders will not take the driver licensing system seriously and will not graduate to a full license. This could restrict some people being employed in positions that require a class 1 driver's license.

Please do not hesitate to contact me should you require any further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Lucas', written in a cursive style.

John Lucas

Insurance Manager

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Te Kāhui Inihua o Aotearoa