

Submission to  
New Zealand Transport Agency

From



On

**Land Transport Rule (Driver Licencing)  
Amendment Rule 2019  
Rule 91001/13**

**3 May 2019**

**Insurance Council of New Zealand**

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## Land Transport Rule (Driver Licencing) Amendment Rule 2019

The Insurance Council (ICNZ), representing 32 general insurers is pleased to be given this opportunity to provide comment on the Land Transport Rule (Driver Licencing) Amendment Rule 2019.

ICNZ has consulted with its motor insurance provider members on the proposals set out in the Yellow Draft Rule 91001/13.

### **Proposal 1: Reduce requirements for eyesight testing.**

1. We do not support the proposal to remove the eyesight testing for licence class 1 & 6 renewals between ages 45 to 75 years of age. We are concerned that with any removal for the need for eyesight tests when renewing a licence for a classes 1 and 6 after the age of 45 years with no further eyesight tests until age 75 years will have the potential to expose all road users to greater risk.
2. This proposal will likely contribute to a reduction in road safety as the current mechanism to pick up deficient eyesight every time a class 1 & 6 licence is renewed every 10 years after the age of 45 years will be lost. We will then be left with a 30 year period when drivers eyesight may not ever be checked and some of those drivers may be suffering from eyesight conditions that could make it dangerous for them to drive without corrective lenses.
3. This proposal to reduce requirements for eyesight testing just in the interests of streamlining the driver licencing renewal system is not in the interests of safety. We believe there are other solutions to allowing eyesight testing to be verified for online driver licence renewals.
4. We note that outcomes of the two crash data studies outlined in the Yellow Draft did indicate that there was little discernible safety benefit for continuing with the current eyesight testing regime. We believe its very difficult to have such a study, as eyesight issues or lack of being able to see another vehicle, object or person are not often recorded as its often admitted by the driver after an accident. It's the same issue with insurance claims. Failure to see another vehicle, object or person due to eyesight impairment is rarely disclosed to insurers as the cause of the accident. There will never be any meaningful data.

5. ICNZ accepts that the current eyesight testing undertaken at the licencing renewal agencies is not accurate. We propose a solution that would complement the proposed online digital licence renewal system. Many people over the age of 45 years of age get eyesight/eye health checks every 2 to 3 years. Many of these eyesight tests are paid for by employers as part of workplace health and safety initiatives. The optometrist would issue eyesight test certificate that could be in a digital form and so long as the test certificate was not over 3 to 5 years of age then that would suffice for a licence class 1 & 6 renewal.
6. The wearing of corrective lenses prescribed by an optometrist would be a condition on the driver's licence. A breach of the driver's licence conditions for example, the failure to wear corrective lenses prescribed by an optometrist for driving could affect insurance coverage if an accident occurred where the not wearing of the optometrist prescribed corrective lenses was causative to the accident.
7. ICNZ strongly recommends that eyesight testing for driver's licence class 1 & 6 renewals between ages 45 to 75 years of age is retained but in a new workable form as we have outlined in our point 5, that would complement online licencing renewals.

**Proposal 2: Simplifying the progression from Class 2 to Class 5.**

8. ICNZ has no issues with the proposals to make it more efficient to progress from a class 2 licence to a class 5 licence. It will be important that training courses are robust and fit for purpose.

**Proposal 3: Remove the Accelerated Licencing Process**

9. ICNZ see no reason to maintain the Accelerated Licencing process if it is not being utilised. It would be partially redundant with the proposed change allowing simpler progression from class 2 to class 5.

**Proposal 4: Remove the requirement for special-type vehicle endorsements**

10. ICNZ has no issues with the proposal to remove the requirement for special-type vehicle endorsements.

**Proposal 5: Standardise speed thresholds for tractors and special-type vehicles**

11. ICNZ has no issues with the proposal to Standardise speed thresholds for tractors and special-type vehicles.

**Proposal 6: Simplify the rules for tractors that can be driven on a Class 1 licence**

12. ICNZ has no issue with the proposal to align the licencing requirements for driving agricultural and non-agricultural tractors using a Class 1 licence.

**Proposal 7: Consolidate Schedule 3 considering proposals 5 & 6**

13. ICNZ agrees that the consolidation of schedule 3 makes sense with proposals for standardise speed restrictions for tractors and simpler rules for driving tractors on a Class 1 licence.

**Proposal 8: Allow automatic renewal of general licences for some endorsement holders**

14. ICNZ has no issue with the proposed rule change to allow automatic renewal of general licence for endorsement P, I, O & D holders.

**Proposal 9: Improve oversight of approved course providers**

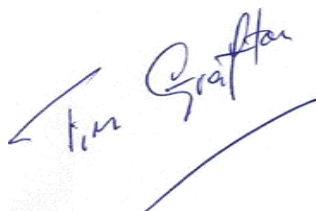
15. ICNZ fully supports the need for heavy vehicle approved training providers to be under much closer scrutiny than they are currently. New Zealand relies on competent drivers graduating from approved training course providers in the interests of safety and productivity.

**Additional Proposal: Minor amendment to Clause 44 – ‘health practitioners’**

16. ICNZ has no issue with the proposed minor amendment to clause 44(2A) (b) allowing the standardise use of the term ‘health practitioner’

Should you have any questions regarding this submission, please do not hesitate to contact John Lucas: (04) 495 8005 or [john@icnz.org.nz](mailto:john@icnz.org.nz).

Yours sincerely,



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