

27 May 2025

New Zealand Transport Agency Waka Kotahi
44 Bowen Street Wellington
Land Transport Rules Team

GDLS@transport.govt.nz

Land Transport Rule: Proposed Improvements to New Zealand's Graduated Driver Licensing System for Class 1 Licences

Thank you for the opportunity to provide comment on the proposal to make changes to the driver licencing system to encourage more learner drivers to obtain a full drivers licence sooner.

Te Kāhui Inihua o Aotearoa | The Insurance Council of New Zealand (ICNZ) represents general insurers. Our members accept the risks of over NZ\$2 trillion of New Zealand's assets and liabilities. ICNZ's members provide insurance products ranging from those usually purchased by individuals (such as home and contents insurance, travel insurance, and motor vehicle insurance) to those purchased by small businesses and larger organisations (such as product and public liability insurance, professional indemnity insurance, cyber insurance, commercial property insurance, and directors and officers insurance).

In 2024 ICNZ members paid out \$1.73 billion in motor vehicle claims.

ICNZ and its members generally support the proposed changes to the Graduated Drivers Licensing System.

We agree that making the current graduated driver licencing system easier to access so more New Zealanders will hold a full driver's licence should contribute towards economic productivity for the country. Most employers would require employees with driving positions to hold a full driver's licence.

We do feel that it will be important that with the proposal to remove the final practical driving test will need to be replaced with a hazard perception test that was discussed in the consultation document as a possibility. We believe a hazard

perception test simulated online needs to be incorporated into the learner stage as is required in Australia.

We support the proposal for the reduction in the demerit points threshold for novice drivers as well as a zero-alcohol limit, meaning the novice driver receives 50 demerit points and their learner/restricted licence would be suspended and then would have to be reinstated.

We do not agree with the restricted period recommencing, or being extended, as a result of any infringement. We feel this is too onerous in the case of minor infractions and the effect of the proposal to halve the demerit points limit that triggers a loss of licence while on a restricted licence should be sufficient to encourage compliance with road rules.

Consider a scenario where a restricted licence-holder, say a new immigrant with one month to go until they get their full licence, gets a ticket for driving an unregistered vehicle. The level of fine \$200.00 and 20 demerit points would suggest that this is not considered a serious offence, yet this person would not be able to drive after 10pm or carry passengers for another 24 months. This would be counterproductive to getting more restricted licence holders on to a full licence.

The Insurance Council fully supports NZTA approving advanced driver training courses that can reduce the time a driver would have to spend on their restricted driver's licence. We know these courses (so long as they are practical behind the wheel training) are effective for those obtaining their heavy vehicle licences. We would like to see what standards the NZTA will require for providers of advanced driver training courses going forward for both class 1 and 6 licences.

We do support the change to vision test requirements to only requiring a vision test when you first apply for a driver's licence and when renewing your licence at age 45 and drivers over the age of 75.

Effective enforcement is required by New Zealand Police when dealing with learner and restricted license holders that are caught driving outside their licence terms such as carrying passengers and driving at night.

Please contact John Lucas john@icnz.org.nz (0274411283) if you do have any questions.

Ngā mihi,

John Lucas
Insurance Manager
Insurance Council of New Zealand