

Regulatory Impact Statement

Amendments to the Land Transport (Driver Licensing Rule) 1999

Agency Disclosure Statement

This Regulatory Impact Statement has been prepared by the Ministry of Transport. It provides an analysis of options to contribute to a more efficient transport regulatory system by modernising the driver licensing system, making it more efficient and ensuring it remains fit for purpose.

The Land Transport (Driver Licensing Rule) 1999 gives little flexibility in how to meet the goals of the driver licensing system and changes are necessary to ensure the driver licensing system can respond efficiently to current and expected changes in the land transport sector.

Evidence to inform the proposals in this RIS was collated from a range of sources. These included:

- “Vision and driver licensing: cross-jurisdictional comparison of standards and policies and evidence from international research” prepared by the NZ Transport Agency
- “Crash Study: Impacts of Vision Testing” prepared by the NZ Transport Agency
- Independent review of “Crash Study: Impacts of Vision Testing” and other literature
- Cost-benefit analyses prepared by Castalia Strategic Advisors
- Submissions made to a discussion document on proposals to amend the Rule issued by the Associate Minister of Transport in April 2016

The complex nature of the transport system limits a complete analysis. It was not possible to provide a detailed economic assessment for all the proposals. Where this has not been possible, a description of the likely possible impacts has been provided.

A full cost-benefit analysis of the package of proposals was undertaken. Given the complexities of modelling the road transport sector and the wider economic and social impacts, the estimates of total benefit can only be approximate. Nonetheless, we have a high degree of confidence that the proposals will individually and collectively provide a net benefit without compromising safety.

The proposals are not expected to impair existing property rights, restrict market competition, reduce investment or override fundamental law principles. There will be minor financial impacts for providers of the approved course for Class 3 licences. The removal of wait-times associated with the practical test pathway may mean that there will be a reduction in the number of people taking the approved course pathway and there may be significant financial impacts for providers of related approved courses. The proposal to reduce the frequency of vision testing for licence applications will have an impact on the revenue currently available to optometrists and medical professionals who provide eyesight certificates.

The proposed changes will be incorporated into a draft Rule and, as required by the Land Transport Act 1998, will be made available for public consultation.

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Date

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Executive summary

1. Holding a valid driver licence has an important role for most people and businesses. It enables the easy movement of goods and people, aids social connectivity and employability, assists road safety, and provides a handy form of identification. As at 31 December 2015, there were 3.42 million driver licences in force and in the last financial year to 30 June 2016, approximately \$60 million was paid in driver licensing and testing fees. There were 238,000 licence applications and 3004,000 renewals over the 2015 calendar year.
2. A review of the driver licensing regulatory system was initiated by Government in December 2014, and was conducted jointly by the Ministry of Transport (the Ministry) and the NZ Transport Agency. The review was a response to the Government's commitment to achieve a more efficient transport regulatory system and better public services. The principal objective of the review is to contribute to a more efficient transport regulatory system by modernising the driver licensing system, making it more efficient and ensuring it remains fit for purpose.
3. The review team concluded that the current system is working adequately but there are significant opportunities for improvement. These would produce benefits for businesses and drivers by reducing compliance costs, improving the customer experience, and enabling better and easier compliance with the law. These changes need to be made while maintaining road safety outcomes. It concluded that improvements to the driver licensing system would be achieved with a combination of changes to the Rule and administrative improvements. Rule changes include reducing vision testing at licence renewal (enabling future online renewal of driver licensing), and a streamlined heavy vehicle licensing system; administrative changes will include system improvements to reduce costs, new learning tools to address literacy issues and supporting offenders to become relicensed.
4. The administrative changes are underway. This Regulatory Impact Statement summaries the costs and benefits of changes to the Rule to achieve the desired objectives through legislative changes.
5. Beginning in December 2014, there has been an extensive engagement process with key stakeholders and participants in the transport sector. This included workshops with reference groups and specific discussions with some stakeholders leading to the release of a public discussion document in April 2016.
6. The proposals in this RIS are addressed in three parts:

Moving to a digital licensing environment through changes to vision testing requirements

7. One of the Government's 'better public services' goals is to enable New Zealanders to complete their transactions with government easily in a digital environment. Each year 294,000 New Zealanders renew their driver licence. Increasingly they are expecting to be able to do this online, in a manner similar to passport renewal. To facilitate this, the Rule needs to be amended to change the requirements relating to vision testing for licence applications.

Supporting a more productive commercial driving sector

8. The transport sector has raised concerns that the current heavy vehicle driver licensing system is complex and can be costly. This paper proposes to make the progression from a Class 2 licence to a Class 5 licence smoother, for example, by removing some learner licence classes in favour of supervised driving. It also proposes removing the Accelerated Licence Process, because of low uptake from drivers.

Standardising regulatory requirements and reducing compliance costs

9. The Government is committed to better regulation, which includes reviewing existing regulation in order to identify and remove requirements that are unnecessary, ineffective or excessively costly. This paper proposes simplifying and standardising the rules relating to special-type vehicles to make them easier to understand and comply with.

Status quo

Driver licensing and its regulation

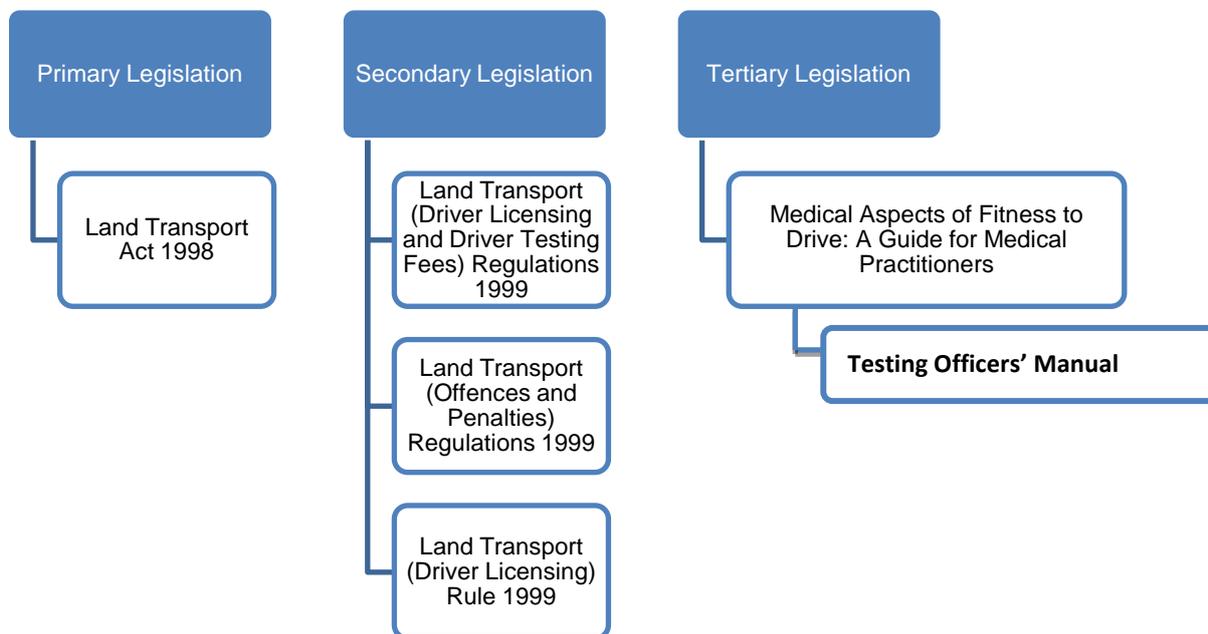
10. Road transport plays a key role in moving people and freight. Driver licensing has an important role in supporting road safety – it shows a driver has met the required standard of medical fitness, road rule knowledge and driving skill for any particular type of vehicle. It also assists the New Zealand Police (the Police) to identify drivers who are not entitled to be driving, and those with specific conditions placed on their driving.
11. There were around 3.4 million driver licences in force in New Zealand as at 31 December 2015. In the financial year ending 30 June 2016 around 238,000 new licence applications were made and around 300,000 licences were renewed, with approximately \$60 million being paid in licence and test fees.
12. The NZ Transport Agency is the regulator of the driver licensing system. It sets driver licensing test standards, maintains the driver licensing register and oversees nationwide licensing and testing services through a network of contracted third party service providers.
13. New Zealand's current driver licence system came into effect on 3 May 1999. It was the result of a substantial overhaul of some aspects of the previous system, namely the driver licence class structure and delivery of testing, although some aspects of the system remained essentially unchanged from the 1920s. The changes included the introduction of photo driver licences and the need for 10-year licence renewal. In response to the significant public opposition to the changes, the driver licensing legislative framework (outlined in the chart below) was set up in a prescriptive manner with much process detail contained in the Rule.

Issues with the status quo

14. Discussions with stakeholders have suggested that driver licensing requirements are often considered complex and costly to access, with significant in-person or phone transactions required. These costs include the time taken by a person to visit a driver licensing agent which can be a high compliance burden. A key issue influencing the complexity and cost of the driver licensing system is the overall design and level of prescription in the current legislative framework.

15. All of the requirements for licence renewal could be made available online except for vision testing. There is currently no known method for testing of vision to an appropriate level of reliability using an online platform.

The driver licensing legislative framework



Problem Definition

General description of the problem

16. The detailed nature of the Rule and the inflexibility of many of its provisions limit the ability of the driver licensing system to adjust to the changing nature of the transport task, and to make use of new technologies to improve productivity and reduce compliance costs.
17. If the Rule is not changed, opportunities to improve productivity and reduce compliance costs could be missed. As the transport sector changes there is a need for the driver licensing system to be able to adapt to support it.
18. In December 2014, the Government announced a review of New Zealand's driver licensing system. The review found that the core policies of the driver licensing system are sound but there are areas where changes in the system could produce measurable social, safety, and economic benefits. In particular the review found that there are opportunities to:
 - move to a digital licensing environment (enabling online driver licence transactions)
 - support a more productive and streamlined commercial driving sector
 - reduce compliance costs by standardising some regulatory requirements

Non legislative initiatives

19. These proposals will complement other non-legislative initiatives aimed at reducing barriers to obtaining a driver licence and promoting progression through the driver licensing system. These measures form part of a cross agency¹ action plan developed out of the experience of the Auckland Co-Design, to reduce barriers to accessing, or progressing through, the driver licence system.
20. Barriers related to driver licensing are felt most acutely by vulnerable groups. This suggests that the issues may have more to do with socio-economic disadvantage than with barriers within the driver licensing system itself but there are some more systemic issues that will be investigated, in order to make it easier for all young people to obtain a driver licence. Some of the factors identified as barriers to obtaining a driver licence are integral to road safety, such as the standard of the restricted practical driving test, and any changes to them will be carefully examined for risk.
21. A key proposal in the action plan is the establishment of a driver licensing community fund. Activity will be aligned with the Regional Economic Development Action Plans.
22. The action plan incorporates a combination of immediate operational actions to address known barriers and establishment of a framework to support a more strategic and joined-up response across agencies. Improved coordination and governance, research and evaluation will provide the foundation for further development and prioritisation of the cross-agency multi-year work programme.
23. Examples of non legislative improvements to the driver licensing system will include system improvements to reduce costs, new learning tools to address literacy issues, and supporting offenders to become relicensed.

Objectives

Statutory basis of review and any constraints

24. The review of the Rule is not being undertaken to meet a specific statutory requirement. The review is a response to the Government's commitment to achieve a more efficient transport regulatory system and better public services. The principal objective of the review is to contribute to a more efficient transport regulatory system by modernising the driver licensing system, making it more efficient and ensuring it remains fit for purpose.
25. The Land Transport Act 1998 sets out process requirements before a transport rule can be amended. This includes public consultation on a draft rule. The Act, however, does not specify criteria to be considered when reviewing a rule.

Desired government objectives

26. The principal objective of the review is to contribute to a more efficient transport regulatory system by modernising the driver licensing system, making it more efficient and ensuring it remains fit for purpose.

¹ NZTA, Ministry of Social Development, Ministry of Business, Innovation and Employment

27. A fit for purpose licensing system is crucial to the effective operation of the road transport industry and the primary sector, and the review considers changes and improvements that relate to these industries. For example, the Government is supporting industry's need to address the shortage of properly trained heavy vehicle drivers by removing any barriers that may contribute to the shortage. The review considers ways to streamline and simplify the process of becoming a heavy vehicle driver while maintaining or improving road safety.
28. One of the Government's top priorities is delivering better public services to businesses and enabling New Zealanders to complete their government transactions easily online. The review considers changes in the vision testing requirements for renewal of a licence in order to enable moving the driver licence renewal process online. This will make it more convenient and easier for New Zealanders. In considering the proposals, a supporting objective is that road safety will be maintained or improved.
29. The criteria used to assess the proposals were:
- Better regulation – does the option reduce compliance, transaction, administration, and/or enforcement costs, or affect compliance rates, and enforceability?
 - Customer experience – does the option improve, maintain or diminish the customer experience (is it easier and more convenient)?
 - Safety - does the option improve, maintain or diminish safety outcomes?
30. For most people their driver licence is valid for ten years². Most of the current requirements for renewal could be completed in a digital environment similar to that for renewal of a passport. The move to an online driver licence renewal transactions would require a major redevelopment of online renewal services which is currently limited to vehicle licence renewals. The Government's RealMe identification service could be used for providing information about identity for licence renewals similar to the way that it is now used for passport renewals. A business case and development costs will need to be prepared.

² Some people have shorter licence periods e.g. because of penalty conditions imposed on their licences following offending

Options and impact analysis

Vision testing and online licensing

Problem definition

32. One of the Government's 'better public services' goals is to enable New Zealanders to complete their transactions with government easily in a digital environment. Almost 300,000 New Zealanders renew their driver licence every year. Increasingly they are expecting to be able to do this online, in a manner similar to passport renewal. This is currently not possible, as legislation requires the driver to apply in person to a licensing agent's and to undertake a vision test. While most of the current licence renewal requirements could be moved to a digital platform, there is no available technology that allows suitable vision testing online. The requirement to visit an agent's in person and undertake the vision test is a barrier to progressing digital licensing processes.
33. Good vision is of course important for safe driving. The problem is to find a way to enable online licence renewal and at the same time to maintain safety.

Objective

34. The objective of this policy proposal is to support the move to a digital licensing environment. The review has considered the current requirements for repeated vision testing at each renewal to assess whether it is effective in providing the desired safety outcomes.

Options

35. We considered the following options:
 - Option 1 - retaining the status quo: vision is tested at each stage of the Graduated Driver Licensing system and every ten years when a licence is renewed.
 - Option 2 (preferred): only require first time driver licence applicants to have a vision test at a driver licensing agent or provide an eyesight certificate and require all driver licence applicants renewing their licences to make a declaration that they are not aware that their vision has deteriorated since their last renewal. From age 75, the current requirements for older drivers would continue³.
 - Option 3: an applicant who has provided an eyesight certificate for a licence application within the last 5 years does not need to have their vision rechecked. Vision testing at each renewal will continue.
 - Option 4: require first time driver licence applicants to have a vision test at a driver licensing agent or provide an eyesight certificate; require all driver licence applicants renewing their licences at or around the age of 50 years to have a vision test at a driver licensing agent or provide an eyesight certificate; and for all other renewals to make a declaration that they are not aware that their vision has deteriorated since their last renewal until they reach age 75 when older driver requirements begin.

³ Drivers must renew their licence at 75, 80, and every two years after that. A renewal requires a current medical certificate.

Option 1 – maintain the status quo

36. Transport officials believe that there are efficiency gains and administrative savings that can be made by moving away from the status quo. These savings include administrative processing costs, administrative savings from rationalising licensing branches where demand for licensing services is low. There will be time savings for all Class 1 and 6 GDLS applications and renewals after the first application.

New Zealand’s requirements are already more than many jurisdictions

37. Policies for re-testing vision at licence renewal vary across jurisdictions. New Zealand is one of four jurisdictions in Australasia that requires vision testing at every licence renewal, along with New South Wales, the Australian Capital Territory and the Northern Territory. Most other jurisdictions require vision testing at entry to the driver licensing system and start vision retesting from different ages, generally from ages 70 or 80. In the United Kingdom and Victoria, vision testing at renewal is only required if a condition affecting safety to drive is declared or reported. Table 1 shows that New Zealand’s current approach of regular testing at 10 year intervals is considerably more frequent than most other jurisdictions⁴.

TABLE 1: VISION TESTING AT LICENCE RENEWAL IN NEW ZEALAND AND OTHER JURISDICTIONS

Jurisdiction	Vision testing requirements at licence renewal	Licence renewal online, by phone or by mail	Maximum renewal period
New Zealand	Vision tested at every renewal	No.	10 years
Australia			
Victoria	Vision only tested if declared or reported.	Yes (by phone or mail).	10 years
Northern Territory	Vision testing five yearly.	Yes (if an eyesight test isn’t due).	10 years
Australian Capital Territory	Vision test at every renewal, 5-yearly from age 50 and annually after 75.	No.	5 years
New South Wales	Vision tested at every renewal.	No.	5 years
Tasmania	Vision testing annually from age 75.	Yes (by mail, for 1-2 years using photo kit application form).	5 years
Queensland	No vision test before 75.	Yes (if digital photo and signature provided in past 9 years).	5 years
South Australia	Vision test annually from age 70 pre September 2014 after which age-related medical and vision testing was removed.	Yes (if no photo required).	10 years
Western Australia	Vision testing annually from age 80 (current web site suggests that requirements for testing at 75 and 78 have recently been removed).	Yes.	5 years
United Kingdom	Vision only tested if declared or reported.	Yes.	10 years
USA			
New York	Vision tested at every renewal.	Yes (must provide vision certificate).	
California	Vision testing required at renewal in person (every three renewals) and every renewal	Yes.	5 years

⁴ The table is taken from the literature review: “Vision and driver licensing: cross-jurisdictional comparison of standards and policies and evidence from international research” prepared by the NZ Transport Agency.

Jurisdiction	Vision testing requirements at licence renewal	Licence renewal online, by phone or by mail	Maximum renewal period
	from age 70 (every 5 years).		
Illinois	Vision testing at in-person renewal (every other) and every renewal from age 75. Licence duration is reduced from 4 to 2 years at age 80.	Yes.	4 years
Florida	Vision testing required at age 80 and licence duration reduced from 8 to 6 years.	Yes (online; mail for active military members only).	8 years
Canada			
British Columbia	Medical review required from age 80.	No.	5 years
Ontario	Vision testing every two years from 80.	Yes, if not requiring a new photo (every 10 years).	5 years

(Green highlighted countries/ jurisdictions do not test on every renewal)

Option 2 (preferred) – applicants are tested on entry to the driver licensing system and again at 75 years of age

38. Option 2 requires first-time driver licence applicants to have a vision test at a driver licensing agent or to provide an eyesight certificate. All driver licence applicants renewing their licences would be required to make a declaration that they are not aware that their vision has deteriorated since their last renewal, or that any deterioration is being managed by wearing corrective or contact lenses. No further eyesight tests would be required until a driver is 75 when the requirements for older drivers begin. Commercial drivers would continue to be required to pass a higher standard vision test carried out by a medical professional.

Repeated vision testing appears to have no transport safety benefits for younger adults

39. The NZ Transport Agency examined the crash rates of all drivers who renewed their licence during the period 1 January 2005 to 1 January 2011 by matching the driver licence numbers with the Crash Analysis System database. The NZ Transport Agency found that the crash rates are virtually the same when they compared drivers who failed the eyesight test at renewal and were required to drive with corrective lenses (sample size=7,437), and other drivers who passed the eyesight test at renewal and were not required to wear correcting lenses (sample size =678,920).
40. The NZ Transport Agency also found that the crash rates are virtually the same when they compared drivers in the 3 years before they failed an eyesight test at licence renewal and the same drivers in the 3 years after the licence renewal when they were required to wear corrective lenses (sample size=7,437). That is, the crash rates were the same before they failed the vision test as after visual correction.
41. Limitations on the data available prevent crash risk studies that have a larger sample⁵ and that look at a longer period. However, the studies undertaken to date suggest that there is little discernible safety benefit to be gained from repeated eyesight testing as part of the driver licensing process. A member of the Waikato University's Traffic and Road Safety Research Group reviewed the analysis and confirmed the methodology was sound.

⁵ All those who failed the vision test were included in the studies

42. The study is significant because people with a vision deficiency before and after a requirement to wear glasses are no less safe than the general driver population. Although the reasons for this are unclear, it is relevant that the studies do not show that vision is unimportant for good driving, nor is that the claim. Rather that vision testing does not appear to produce road safety benefits.
43. An independent reviewer confirmed the validity of the NZ Transport Agency's methodology and findings. The reviewer also reported that a growing body of research has examined the association between vision and driving performance in older adults who experience age-related visual impairments. The reviewer examined literature provided by those submitters who did not support the reduction in vision testing requirements and concluded that there is a need for regular vision testing for older adults but it is not clear at what critical age threshold regular vision testing should be made compulsory.
44. The European Commission, says that increasingly, researchers recognise that age-based mandatory assessment programmes targeting older drivers are unlikely to produce safety benefits and may have counter-productive results. For example, an Australian study found that Victoria, where there are no age-related licensing controls, had crash statistics for older drivers that were no worse than crash statistics of other states with established age-related regimes.
45. Other international research literature suggests that presbyopia, an age related vision change, starts from around 40 to 45 years; but this condition does not generally impact on driving. Cognition and motor function changes can start to impact driving from age 75 and macular degeneration and glaucoma can be significant, although again, the age at which these conditions becomes significant for driving is unclear.

Economic benefits from reduced vision-testing requirements

46. Cost benefit analysis found there were net benefits from this option for reduced vision testing ranging from \$18.4 million to \$37.5 million over a 20 year period with corresponding BCRs of 3.9 to 6.9⁶.

Option 3 – an applicant who has provided an eyesight certificate within the last 5 years does not need another vision test

47. Option 3 provides that an applicant who has provided an eyesight certificate for a licence application within the last 5 years does not need to have his or her vision rechecked at licence renewal (commercial and older drivers will continue to have vision checks as part of the medical fitness process).
48. The requirement for a vision check at each application means that drivers under the Graduated Driver Licensing System (GDLS) can be tested up to three times in nine months. This requirement for repeated vision testing is not based on the actual risk of a person's vision changing during the period and is particularly inconvenient and costly for those applicants who are required to provide an eyesight certificate with their applications (e.g. if they fail the screening test).
49. Good vision is important for safe driving and most jurisdictions comparable to New Zealand require a vision test at entry into the licensing system. This is appropriate, as it is at a time when a person must pass various tests to demonstrate their fitness to

⁶ From a review of Castalia's cost benefit analyses carried out by MoT

drive. However, the benefit of regular on-going vision testing as part of each driver licensing application is less clear. No other jurisdiction comparable to New Zealand requires repeated vision tests at every stage of the GDLS and there is no evidence to suggest it has safety benefits.

- 50. This option would remove repetitive testing of vision for drivers progressing through the Graduated Driver Licensing System but would still require drivers to have their vision tested at each licence renewal.
- 51. A cost benefit analysis showed that the net benefits ranged from \$5.6 million and \$14.5 million with corresponding BCRs ranging from 1.9 to 3.3⁷.

Option 4 - applicants are tested on entry to the driver licensing system; then at 50 years; then at 75 years

- 52. This is a new option and was not part of the consultation process. There is no consensus about what the critical age threshold is for regular vision testing in older adults. Most jurisdictions restart vision testing after entry into the system from 70 to 80 years (see Table 1). A few countries such as Finland, tests at first entry into the licence system, then at 45 years of age and then every 5 years from the age of 70. The European Commission, as indicated earlier, says that research is increasingly suggesting that age-related testing may have counter-productive results. It notes that a comparison of Finland and Sweden, which has no age related controls, shows that Finland had a higher rate of fatalities among unprotected older road users than Sweden, arguably the result of an increase in the number of older pedestrians who had lost their driving licence.
- 53. This is the option suggested by the NZ Insurance Council during consultation.
- 54. A cost benefit analysis of this option was not carried out but it is expected to show net benefits somewhat fewer than our other preferred option – Option 2.
- 55. It has the advantage that it might be more acceptable to some stakeholders and members of the public who feel uncomfortable about the reduced vision testing. At the same time, it imposes a cost on drivers for which there is no evidence that it produces any safety benefits.
- 56. The following table summarises the options

Criteria	Option 1 - Status quo	Option 2 (preferred) – reduce vision testing requirements and remove the requirement for visions testing at licence renewal	Option 3 – eyesight test within 5 years then no further testing	Option 4 - remove vision testing requirements from between first entry until 50 years of age
Better regulation - reduces compliance burden	No change	Yes as it reduces the costs involved in vision testing	Yes, reduced testing requirements	Yes; but imposes a requirement at age 50 that has few if any safety benefits
Better regulation -	No change	An eventual on-line renewal system will	Yes, a small amount as it	An eventual on-line renewal system will

⁷ As in previous footnote

Criteria	Option 1 - Status quo	Option 2 (preferred) – reduce vision testing requirements and remove the requirement for vision testing at licence renewal	Option 3 – eyesight test within 5 years then no further testing	Option 4 - remove vision testing requirements from between first entry until 50 years of age
enables better / easier compliance		make it easier to comply with requirements to renew and reduce the incidence of unlicensed drivers	reduces the requirement for repeated testing at each stage of the GDLS	make it easier to comply with requirements to renew and reduce the incidence of unlicensed drivers
Improves customer experience	No change	Yes as it removes a barrier to eventual on-line renewal	Yes, somewhat as it minimises the need for repeated testing throughout the GDLS system	Yes, greatly reduced requirement for repeated vision testing both through the GDLS and on renewal
Safety is maintained or improved	No change	Safety is maintained	No change	This option is based on the current knowledge around risks and will maintain and likely improve safety

Streamlining and improving the pathway from the Class 2 licence to the Class 5 licence

Problem definition

57. The heavy vehicle sector is concerned about the complexity of the heavy vehicle licensing system and the costs associated with progressing from Class 2 to Class 5 licences. They consider that these act as a disincentive for drivers or transport companies to invest in obtaining higher licence classes. The Government is also keen to develop a licensing system that is customer focussed and saves users and the Government time and money. By making the system easier to understand and negotiate, costs can be reduced and compliance improved. Transport officials and the industry see the current processes as a possible contributor to the current heavy vehicle driver shortage.
58. The following table provides the numbers of drivers in each licence class as at 1 December 2014. Note that these numbers count only the highest licence Class held, and that each class includes holders of both the relevant learner and full licences.

Licence Class	What you can drive	Number of licence holders
Classes 1&6	car and motorcycle	3,463,996*
Class 2	medium rigid vehicle	76870
Class 3	medium combination vehicle	286
Class 4	heavy rigid vehicle	162779
Class 5	heavy combination vehicle	141217

*This number is as at 30 June 2016

Objective

59. The objective of this policy proposal is to allow easier progression from the Class 2 driver licence to the Class 5 driver licence.

Options

60. We considered the following options:
- Option 1 - retaining the status quo: rely on existing legislative measures
 - Option 2 - remove the Class 3 licence, strengthen practical tests and approved courses, and remove the wait period before practical testing
 - Option 3 - (preferred) remove Classes 3 (3L,3F), 4L and 5L; strengthen practical tests and approved courses; allow drivers to begin learning at next level under supervision
 - Option 4 - allow direct progression from Class 2 full licence to Class 5 full licence for drivers 25 years and over
 - Option 5 – remove Classes 3 and 4; increase weight limits on Class 2; separate assessments from courses; take driver history into account.

Option 1 – maintain the status quo

61. To drive heavy motor vehicles in New Zealand, drivers need a Class 2, 3, 4, or 5 licence. Each licence class covers different vehicle types and weights, with Class 2 being the lightest and Class 5 the heaviest truck and trailer combination.
62. Each heavy vehicle licence class has a learner stage and entry prerequisites. At each *learner licence stage*, applicants aged under 25 years must have held a lower full licence class for at least 6 months before progressing to a higher licence class. Drivers aged 25 or older can apply for the next class of licence after 3 months, or with no wait time if they have completed an approved course.
63. For applications for a *full licence stage*, there is no age distinction. All applicants have two options – they can wait six months in the learner stage then sit a practical driving test, or complete an approved course with no associated wait time.
64. Transport officials believe that efficiency gains and administrative savings can be made by moving away from the status quo.

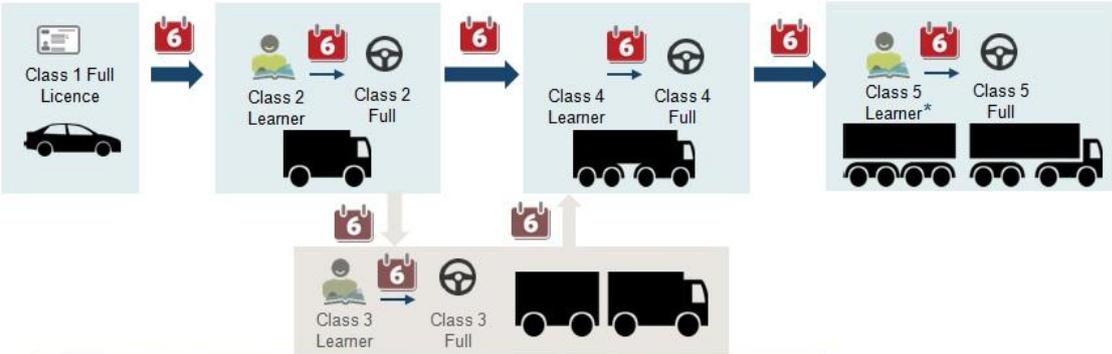
Most choose the approved course pathway

65. The majority of full licence applicants choose to complete an approved course to avoid having to wait six months to be allowed to sit the practical test. This pathway is faster to Class 5 (there are fewer wait time requirements) but it is also significantly more expensive, estimated at \$3,000 for progressing from Class 2 to 5. This pathway tends to be used by employers who have a shortage of qualified drivers and who can train applicants or who prefer to refer their drivers to formal training providers. It is also preferred by applicants who wish to enter the labour market quickly but do not have access to a suitable vehicle for on-road driving experience. The approved course pathway is the only valid pathway if applicants are not in employment or if employers cannot do their own training.

- 66. During the 5-year period ending 2013, 84 percent of applicants proceeding from a Class 2 to a Class 5 full licence achieved their licence by completing an approved course. This is despite the high cost of using this pathway. While the practical test is considerably cheaper at \$60 per test, it involves a six month wait at each learner licence stage before the driver can sit the practical test and a wait time for 3 – 6 months before they can progress to a higher licence class.
- 67. The practical test will be strengthened so that the test and the approved course assessments ensure similar competency regardless of the pathway taken. Some retraining of approved Testing Officers and engagement with VTNZ (as the contracted testing service provider) is required to ensure they have the capacity and capability to deliver the new tests.
- 68. The two separate pathways (practical test or approved courses) are a fundamental component of the HV graduated driver licensing system. It offers consumer choice to applicants and employers. The pathway choice is not changing.
- 69. We expect a shift in applicant preferences when the wait times are reduced and the testing requirements are enhanced i.e. we expect a swing towards the practical test pathway and assumptions have been made for this in the relevant CBA.

Option 1: Status Quo

Under 25 years - Practical test pathway



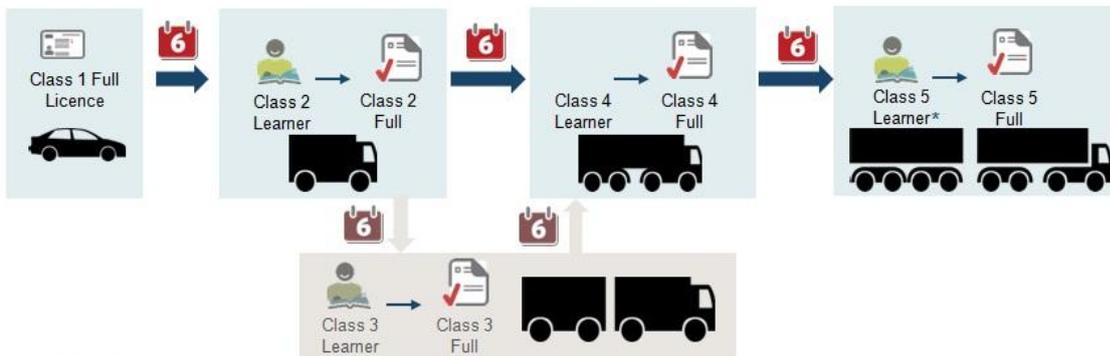
Key features

- Progression is from Class 1 to Class 2, Class 4, and Class 5 (Class 3 is not required as part of progression to Class 5)
- Progression involves 2 theory tests (2L and 5L) and 3 practical tests (2, 4, and 5)
- Minimum time of 6 months between classes is to allow some driving experience before moving to a higher class of learner licence
- Minimum time of 6 months in learner phases is to allow time for learning to drive with a supervisor before attempting a practical test
- Minimum time to progress from a Class 1 Full licence to Class 5 is 36 months
- Minimum age for a Class 1 driver (at 17½ years) to obtain a Class 5 Full licence is 20½ years

*If pass theory test Class 3 Learner, no theory test Class 5 Learner



Under 25 years – Approved course pathway



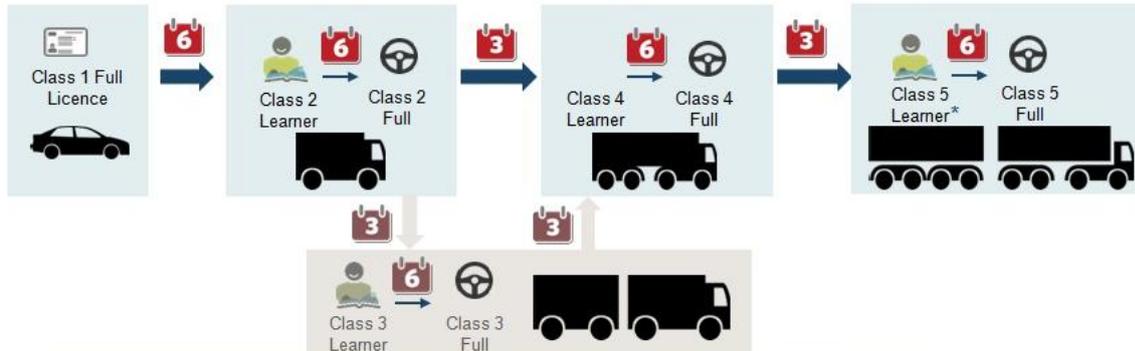
Key features

- Progression is from Class 1 to Class 2, Class 4 and Class 5 (Class 3 is not required as part of progression to Class 5)
- Progression involves 2 theory tests (2L and 5L) and 3 courses (2, 4, and 5)
- Minimum time of 6 months between classes is to allow some driving experience before moving to a higher class of learner licence
- Minimum time to progress from a Class 1 Full licence to Class 5 is 18 months
- Minimum age for a Class 1 driver (at 17½ years) to obtain a Class 5 Full licence is 19 years

*If pass theory test Class 3 Learner, no theory test Class 5 Learner



25 years and over - Practical test pathway



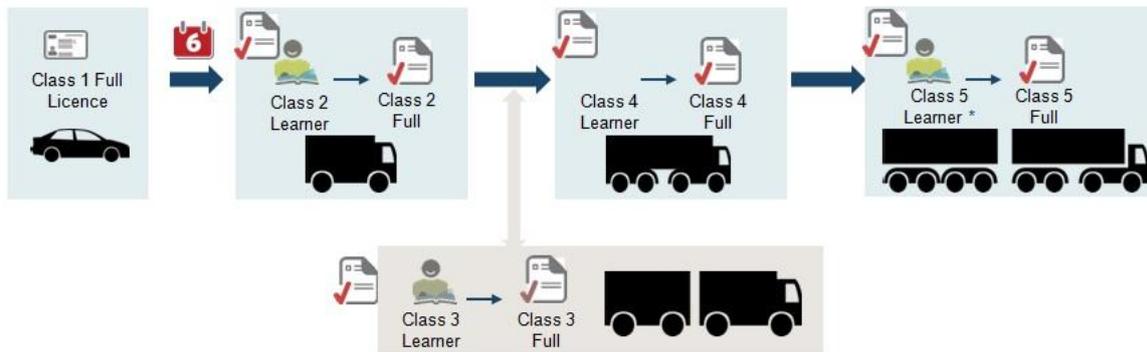
Key features

- The main difference for drivers 25 years and over is that they have a shorter minimum time of 3 months between classes from Class 2 (compared to 6 months for under 25)
- Progression is from Class 1 to Class 2, Class 4, and Class 5 (Class 3 is not required as part of progression to Class 5)
- Progression involves 2 theory tests (2L and 5L) and 3 practical tests (2, 4, and 5)
- Minimum time of 6 months in learner phases is to allow time for learning to drive with a supervisor or before attempting a practical test
- Minimum time of 3 months between classes (from Class 2) is to allow some driving experience before moving to a higher class of learner licence
- Minimum time to progress from Class 1 Full licence to Class 5 is 30 months
- Minimum age for someone who holds a Class 1 Full licence at 25 years to progress to a Class 5 Full licence is 27½ years

*If pass theory test Class 3 Learner, no theory test Class 5 Learner



25 years and over - Approved course pathway



Key features

- Progression is from Class 1 to Class 2, Class 4, and Class 5 (Class 3 is not required as part of progression to Class 5)
- Progression involves 2 theory tests (2L and 5L) and 6 courses (2L, 2, 4L, 4, 5L and 5)
- Minimum time of 6 months between Class 1 and Class 2L is to allow some experience driving a car licence before learning to drive a truck; no other minimum time applies
- Minimum age for someone who obtains a Class 1 Full licence (at 25 years) to progress to a Class 5 Full licence is 25½ years plus time taken to complete all courses

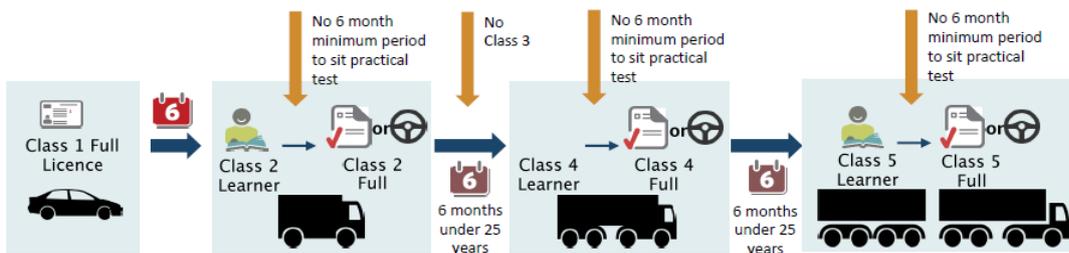
*If pass theory test Class 3 Learner, no theory test Class 5 Learner



Option 2 - remove the Class 3 licence, strengthen practical tests and approved courses, and remove the wait period before practical testing

70. This option retains all current classes except Class 3 (3L and 3F). This option incorporates Class 3 requirements into Class 5.
71. Class 3 is rarely used now as the composition of the truck fleet has changed since Class 3 was introduced. There are only 286 drivers on the driver licensing register who have Class 3 as their highest licence class. Less than 0.1 percent of heavy vehicle drivers hold Class 3 as their highest licence and of these, approximately 90 percent are over 40 years old. As Class 3 is not part of the graduated pathway, the removal of Class 3 would simplify the licensing pathway, while eliminating the administrative costs of maintaining a rarely used licence class.
72. Benefits of Option 2 are that it involves only a small change and cost, the removal of 18 months wait time for those taking the practical test pathway, and the safety gains from enhanced practical tests and approved courses.
73. Costs and risks of Option 2 include a possible higher failure rate from enhanced practical tests and the costs associated with developing the enhanced tests and courses. Transitional arrangements would be needed for existing Class 3 licence holders who do not hold a higher class licence.

Option Two: Remove Class 3, strengthen practical tests, and remove wait period before practical tests



Key features

- Removes Classes 3L and 3
- Strengthens practical tests
- Removes 6 months minimum time to sit practical test (reduces 18 months minimum time Class 2L to Class 5)
- Practical tests and courses on a par
- Under 25 years: Minimum time to progress from Class 1 Full licence to Class 5 is 18 months
- 25 and over: Minimum effective age to progress from Class 1 Full licence to Class 5 is 25½ years plus time taken to pass test or complete course

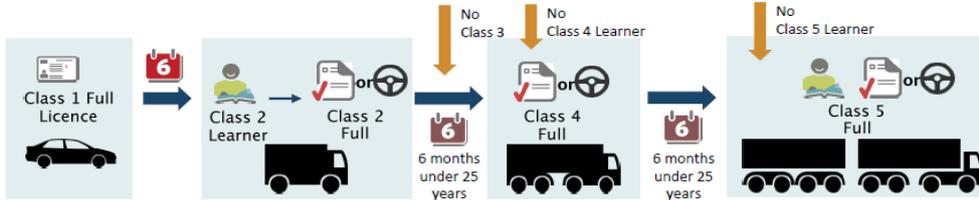


Option 3 (preferred) - remove Classes 3 (3L, and 3F), 4L and 5L; strengthen practical tests and approved courses; allow drivers to begin learning at next level under supervision.

74. A third option is to remove Class 3 (3L and 3F), as well as the learner Classes 4L and 5L. This option involves permitting drivers to begin learning to drive in the next highest class under supervision, enhancing tests and courses, and removing the six-month wait time within classes for a practical test for all drivers. In addition, the option removes the three-month wait time in each of the lower licence classes for applicants aged 25 and over who use the practical test pathway, and introduces a theory test to obtain a Class 5 licence in light of the proposed removal of Class 3.
75. Benefits of Option 3 for drivers include lower costs from removing learner licence applications for Classes 4 and 5; time saved from removed wait-times, and improved safety from enhanced practical tests and courses. Benefits for administrators include the cost savings from removing Class 3 and the Class 4 and 5 learner licences.
76. Costs and risks of Option 3 include the possible safety implications of the younger minimum age at which drivers can reach Class 5, (because wait times are removed) and the costs associated with developing enhanced tests and courses.
77. The cost benefit analysis has estimated the net benefits to be from \$19.1 million – \$38.4 million.
78. Option 3 reduces the overall licensing time-frame. This is likely to have a positive effect on any driver shortages (but may have safety concerns as above). Such shortages are difficult to quantify, and the licensing system is only one way they may be affected.
79. For the enhancements to approved courses and practical tests, the NZ Transport Agency will allocate resources into research and design, including the design of new

test routes and tester training. The rollout of the new courses and tests will need to be aligned with the changes coming into force. The capacity and capability of Driver Licensing Agents will need to be reviewed.

Option Three: Remove some L stages



Key features

- Removes Classes 3L, 3F, 4L and 5L
- Allows holders of a lower full licence class to drive vehicle in next class up if supervised (e.g. Class 2 driver can drive Class 4 vehicle, if supervised by someone who holds that licence)
- Removes 6 months of minimum time for sitting a practical test
- Practical tests and courses on a par
- Retains minimum time when progressing from Full to next Learner stage, i.e. 6 months for drivers under 25 years
- Under 25 years: Minimum time to progress from Class 1 Full licence to Class 5 is 18 months
- 25 and over: Minimum effective age to progress from Class 1 Full licence to Class 5 is 25½ years plus time taken to pass test or complete course



Option 4 - allow direct progression from Class 2 full licence to Class 5 full licence for drivers 25 years and over

80. This option requires a level of supervised driving between 80 and 270 hours for applicants using this pathway, as well as a clean safe driving record in the 24 months immediately before application. The option would also involve enhanced tests and courses.
81. Benefits of Option 4 include the reduced costs and wait-times for heavy vehicle drivers over 25, as well as potential safety benefits from enhanced tests and courses.
82. Costs and risks of Option 4 include the high time-investment of supervision, and the significant difference in vehicle weight and handling between Classes 2 and 5 leading to negative safety outcomes.

Option Four: Express pathway to Class 5

25 years and over only



Key features

- Would not apply to drivers under the age of 25 years because it would license them one year earlier
- Would be a discrete pathway for accelerating between Class 2 and Class 5
- Retains existing pathways for drivers who wish to drive, e.g. only Class 4
- Requires a clean driving record for 24 months (less than 50 demerit points)
- Practical test pathway would require a level of supervised driving experience before being able to sit test - between 80 and 270 hours
- Approved course pathway would require a level of supervised driving experience - between 80 and 270 of learning/experience.



Option 5 – remove Classes 3 and 4; increase weight limits on Class 2; separate assessments from courses; take driver history into account

83. The Road Transport Forum (RTF), supported by Civil Contractors New Zealand, National Road Carriers, and Federated Farmers of New Zealand, proposed an alternative approach to heavy vehicle licensing.
84. The RTF proposal is summarised below.
- Removal of Classes 3 and 4
 - Modifications to the Class 2 weight limits. Specifically, drivers on a Class 2 licence, potentially as young as 17 years and 9 months, would be permitted to drive combination vehicles weighing up to 25,000kg.
 - Requirement that the assessment component of approved courses be conducted independently of the original approved course provider. That is, a driver taking a course with one provider would need to have their testing administered by a second provider.
 - Vary the wait-time following Class 1 between 3 and 15 months, depending on a given applicant's driver history.
85. Benefits of this proposal include the reduced overall licensing time-frame and the potential for increasing the integrity of approved course providers with independent assessments.
86. Costs of the proposal are summarised below:

- The modifications to Class 2 weight restrictions would require more significant associated modifications to the Class 2 tests. The RTF modifications permit Class 2 drivers to drive significantly heavier combination vehicles at a younger age than either Option 3 or the status quo. The revised tests would need to assess the capability of drivers to handle a broader and heavier range of vehicles suggested by the RTF’s proposal. Many drivers, including most bus drivers and local delivery truck drivers, stop at the current Class 2. They do not need the skills to handle larger combination vehicles, and the RTF proposal would require them to do additional training with no added benefit.
- The independent testing requirement may increase costs for applicants as well as introducing administrative complexity. Under the RTF proposal, drivers may be required to deal with two course providers, one providing the training and another providing independent assessment, rather than one provider (as at present). This would demand additional time, and possibly additional fees. Access issues may be created for some applicants (e.g. those in easy driving distance of only one course provider).

87. The variable wait-time may increase costs for both drivers and administrators. For drivers, the wait-times ranging from 3 to 15 months means less certainty about the licensing process and individualised assessments of driver history to determine an appropriate wait time⁸. For administrators, the new feature would require the creation of processes to deal with adverse decisions on driver history evaluations. The following table compares Options 1 – 4 and the RTF proposed option.

Comparison of options: Simplifying the pathway from the Class 2 to Class 5 licence

Criteria	Option 1 - status quo	Option 2 - remove Class 3, strengthen practical tests and approved courses, remove the wait period before practical testing	Option 3 – (preferred) remove Classes 3 (3L,3F), 4L and 5L	Option 4 - direct progression from Class 2 F to Class 5 F for drivers 25 and older years; enhanced tests	Option 5 – (RTF Option) Remove Classes 3, 4; increase weight limits for Class 2; separate approved courses and assessors; take account of driver history
Better regulation - reducing compliance costs	No change	Yes, the removal of 18 months wait time for those taking the practical test pathway will reduce compliance costs	Yes, lower costs from removing learner licence applications for Classes 4 and 5; time saved from removed wait-times; Administrative savings from removal of Class 3 and Class 4L and 5L	Yes, reduced costs and wait-times for heavy vehicle drivers over 25	No, costs would be increased and regulation would be more complex
Better regulation -	No	Little change	Yes, easier to comply with the	Yes	No as there would need to be

⁸ The RTF written submission proposed 12 months, but this was subsequently clarified.

Criteria	Option 1 - status quo	Option 2 - remove Class 3, strengthen practical tests and approved courses, remove the wait period before practical testing	Option 3 – (preferred) remove Classes 3 (3L,3F), 4L and 5L	Option 4 - direct progression from Class 2 F to Class 5 F for drivers 25 and older years; enhanced tests	Option 5 – (RTF Option) Remove Classes 3, 4; increase weight limits for Class 2; separate approved courses and assessors; take account of driver history
enabling better and easier compliance	change		requirements of each licence Class		additional legal definition and enforcement
Improving the customer experience	No change	Yes, a small change from the reduced time required for the practical test pathway	Yes, removal of the Class 4L and 5L licences saves time and money for drivers		Yes because there would be fewer Classes to get through to Class 5. No because having separate processes for assessments could be problematic for some applicants
Maintaining or improving road safety	No change	Yes, there will be safety gains from enhanced practical tests and approved courses.	Yes, there will be safety gains from enhanced practical tests and approved courses.	No, while there may be safety gains from the enhanced tests and courses, the significant difference in vehicle weight and handling between Classes 2 and 5 will have negative safety outcomes	No, as it would mean very young drivers being able to drive the heaviest of vehicles

Removing the Accelerated Licensing Process

Problem definition

88. Accelerated Licensing Process (ALP) was introduced as a way that drivers employed by an approved company can go from Class 2 full driver licence to a Class 4 or Class 5 full licence more quickly. The ALP was developed as a pilot programme between 2003 and 2011 in response to sector concerns about labour supply – that is, it was considered that if the process was shortened, then employers would be able to get their drivers up to the licence class they needed in a shorter time. It aimed to increase the supply of higher qualified drivers.
89. The core requirements for the ALP process are that the driver:
- is from a company that is approved for ALP

- meets licence pre-requisites (such as holding a full Class 1 licence for a period of time)
- passes a preliminary assessment (multi-choice questions)
- drives subject to certain conditions while under supervised driving, for example, no more than eight hours cumulative driving in a day
- completes 60 hours of supervised driving
- undertakes an assessment of driving skills
- completes 200 hours of unsupervised driving
- undertakes a practical driving assessment.

Low uptake

90. The problem is that the up take rate is very low. Since the programme was trialled, 188 drivers have completed the ALP and around 140 companies have used the scheme. In the last two years, however, less than 10 applicants have applied under the scheme. There have been several recent attempts to promote the ALP scheme but with little improvement in uptake. It is not achieving its original objectives of increasing the supply of drivers with Class 4 and 5 qualifications.
91. The ALP's prerequisites are prohibitive for some drivers (e.g. because they have an offending history), meaning that up to 30 percent of applicants are unable to access the scheme.

The ALP does not address employers' needs

92. The requirements covering the ALP make the process unwieldy and overcomplicated and the outcomes can be achieved via another route. These are contributing factors to the low uptake of the programme. Feedback from industry suggests that the system is overly bureaucratic and time consuming. The ALP does not address driver retention issues, which was one of the main reasons for its introduction.
93. Overall, employers say that the ALP does not provide more qualified drivers more quickly. While the ALP can shorten the time taken to reach a Class 5 licence by almost a year for drivers under 25, the costs of putting an employee aged 25 years and over through the ALP process are comparable to or less than the cost of an approved course and the time commitment is less. Most drivers who have considered using the ALP tend to be over 25 years old.
94. In addition, some companies have become approved course providers as a preferred alternative to using the ALP and so do not use the ALP at all.

Drivers trained under the ALP may pose a safety risk

95. One in five drivers that had used the ALP subsequently had their licence disqualified or partially disqualified. Given that disqualification results from serious driving offences, this could suggest that the drivers trained under the ALP may pose a higher safety risk than other heavy vehicle drivers. However, there is no evidence that the ALP causes this risk.

Objective

96. The objective is to remove the ALP because it is hardly used and it is not meeting employers' needs.

Option 1 – status quo – keep the ALP running

97. As described in the problem definition, retaining the status quo has not been considered.

Option 2 (preferred) – Remove the ALP from the Driver Licensing Rule

Economic impacts

98. A cost benefit analysis estimated the costs and benefits of removing the ALP at \$76,000 present value over 20 years. The savings identified were savings from the costs to the NZ Transport Agency of operating the ALP, and savings to employers from the difference in the costs of the ALP compared to the approved course pathway (approximately \$300 per driver).

Benefits to drivers

99. The approved course pathway is NZQA accredited whereas the ALP is not. The approved course pathway provides credits towards the National Certificate in Driving, in addition to the Class of licence.

Better processes

100. Other proposals in this paper are more likely to address industry concerns about the flow of drivers into the heavy vehicle driving workforce.
101. The following table compares Options 1 and 2.

Comparison of options: Removal of the Accelerated Licence Process

Criteria	Option 1 - status quo	Option 2 (preferred) - Remove the ALP from the Driver Licensing Rule
Better regulation - reducing compliance costs	No change	Yes, because the ALP costs employers more and does not meet the needs of industry
Better regulation - enabling better and easier compliance	No change	Yes because the ALP requirements are unwieldy and overcomplicated; "overly bureaucratic" according to industry and do not provide the desired results
Improving the customer experience	No change	No change because it is hardly used
Maintaining or improving road safety	No change	Possibly, (because 20% of drivers going through the ALP subsequently had serious driving offences although no causal link has been established)

Review of the requirements for licence endorsements for drivers of special-type vehicles

Problem definition

Health and Safety at Work Act 2015

102. The Health and Safety in Employment Act 1992 was replaced by the Health and Safety at Work Act 2015 (HSWA). The HSWA defines vehicles as a 'workplace' in some circumstances and places a responsibility on employers to ensure that they or their employees are able to operate safely any vehicles they will be using. This includes operators of special-type vehicles on roads.
103. The HSWA means there are two regulatory systems governing the operation of special-type vehicle endorsements. The HSWA duplicates the requirements of the NZ Transport Agency's driver licence endorsement programme. This is not good regulatory practice.
104. The HSWA is more appropriate for the task of ensuring that special-type vehicles are safely operated because special-type vehicles are rarely used on roads, and frequently used in occupational settings.

Objective

105. The objective of the proposal is to remove the duplication of regulatory systems governing the operation of special-type vehicles.

Option one - Status quo

106. A special-type vehicle is defined in the Driver Licensing Rule as a motor vehicle that is a forklift, runs on rollers, runs on self-laying tracks, or runs on wheels but is not a passenger vehicle, a trade vehicle, a tractor, a fire engine, or a vehicle recovery service vehicle. Special-type vehicles are rarely driven on the road with the exception of wheeled vehicles (e.g. combine harvesters, grape harvesters, mobile cranes and front end loaders) which may be driven on the road more frequently and are capable of being driven at higher speeds.
107. A person who drives a special-type vehicle on a road must hold an appropriate endorsement in addition to a licence. A driver does not need to hold an endorsement if the vehicle is not driven on the road, e.g. where a forklift is only used in a warehouse. Licence endorsements are a formal qualification, represented by a letter on the holder's driver licence, and awarded by approved course providers. They require the applicant to demonstrate an understanding of how the relevant special-type vehicle is handled on the road.
108. To apply for a special-type vehicle endorsement, a person must hold a New Zealand full licence that authorises them to drive motor vehicles of an equivalent gross laden weight to the special-type vehicle the person intends to drive. For example, a holder of a Class 1 driver licence can drive a forklift that has a gross laden weight of not more than 18,000kg.
109. To operate more than one category of special-type vehicle, a person must get more than one special-type vehicle endorsement.

Option Two – (preferred) - Remove the requirements in the Rule for special-type vehicle endorsements

110. The licence endorsements in the Rule for special-type vehicle endorsements for forklifts, rollers, tracked vehicles such as bulldozers, and wheeled vehicles such as combine harvesters cover the same ground as the requirements of the Health and Safety at Work Act 2015. Given that these vehicles are considered a workplace under the Act, it makes good sense for the operation of these vehicles to be governed by that Act.

Safety will not be compromised

111. While endorsements provide extra training for special-type vehicle operators, special-type vehicles are only rarely involved in on-road accidents. This means that the potential improvements in safety associated with extra training are correspondingly small. In the last ten years, there has been only one fatal on-road crash involving a special-type vehicle where the special-type vehicle driver was at fault.

Economic benefits

112. Removing special-type vehicle endorsements would reduce costs for both drivers and administrators. The estimated overall net benefit of removing these endorsements is between \$1 and \$6 million present value over 20 years. The net benefit comes mainly from removing the need to attend additional training. There will also be a small compliance cost saving as drivers of these vehicles will no longer be required to apply and pay for the endorsements. This option would also match up with the Australian approach and make it easier for New Zealand to comply with qualifications recognition under the Trans-Tasman Mutual recognition Treaty.

113. The following table summarises the analysis of the two options.

Criteria	Option 1 - <i>status quo</i>	Option 2 (preferred) – <i>Remove the requirement for drivers of special-type vehicles to hold relevant endorsements</i>
Better regulation - reducing compliance costs	No change	Yes; the removal of two regulatory systems governing this will reduce compliance costs
Better regulation - enabling better and easier compliance	No change	Yes because it streamlines the requirements and clarifies the regulatory requirements
Improving the customer experience	No change	Yes because it streamlines the requirements ; some drivers may be unhappy with no longer having the endorsement (but ITOs will be able to provide a qualification)
Maintaining or improving road safety	No change	No change

Standardise speed requirements for tractors and special-type vehicles

Problem definition

114. Schedule 3 of the Rule was amended in 2013 to increase the maximum speed for agricultural vehicles from 30 kph to 40 kph. The 30 kph speed limit for other types of vehicles (non agricultural and special-type) remained unchanged. The anomaly was created when Schedule 3 was amended in 2013 to increase the speed limit for agricultural vehicles only. At the time, the review focussed only on agricultural vehicles.
115. As a result, Schedule 3 now has seven driver licensing requirements for vehicles that can travel up to or more than 30 kph and four for vehicles that can travel up to 40 kph. The different speed limits means that a heavier vehicle can be driven on a lower licence class or licence stage.
116. The status quo is complicated to understand and comply with. It is consequently difficult to enforce.

Objective

117. The objective of this proposal is to simplify and align the rules relating to speed restrictions for special-type vehicles when they travel on the road.

Option 1 - Status quo

118. For the reasons given in the problem definition, the status quo was not considered.

Option 2 – (preferred) – Standardise all speed restrictions for agricultural vehicles, non agricultural tractors and special-type vehicles to 40 kph

119. The amended limit reflects a natural divide in the design speed of tractors at around 40 kph. The majority of older tractors were designed to travel at speeds of up to 40 kph, while tractors that are more modern have been designed to travel well in excess of 40 kph. For this reason, it is proposed to standardise the speed requirements to 40 kph.
120. There is no evidence to support the speed differentiations in schedule 3. The *Agricultural Transport Legislation Review*, completed in 2012, noted that this issue would be addressed in the Driver Licensing Review. The *Agricultural Transport Legislation Review* also noted that a low speed creates the risk of open road rear end crashes, and raising the speed limit may reduce this risk.
121. Since June 2015, the NZTA has received around 89 calls relating to the licence and endorsement requirements for vehicles affected by this change. At an average of 4 minutes per call, this is around 6 hours of call centre time per year that could be avoided by the simplification of the rules. While not a major cost, it does illustrate the confusion with the status quo over the requirements.

Safety benefits

122. The proposed change may improve road safety slightly by reducing the speed difference between the affected vehicles and other vehicles on the road. Speed mismatch is a leading causal factor in on-road accidents for agricultural vehicles. Faster-moving tractors may also improve the flow of traffic on the road. This may help reduce congestion on open roads. This effect is likely to be small given that tractors are rarely used on roads.

- 123. It will make the law easier to comply with and easier for Police to enforce.
- 124. The vehicles affected by this change are rarely involved in crashes. For example, in the last 16 years there have been 30 fatalities associated with agricultural vehicles on roads.
- 125. The proposed standard limit of 40 kph would not apply to drivers on a Class 1 licence who would still be permitted to drive tractors with a gross laden weight not exceeding 6,000kg at the posted speed limit.

Economic benefits

- 126. Given that any change in safety is likely to be a small (or no change) and there will be reduced confusion for drivers and Police, this option is likely to result in a net benefit.
- 127. The following table compares the two options

Criteria	Option 1 - <i>Status quo</i>	Option 2 (preferred) - <i>Standardise all speed requirements to 40 kph</i>
Better regulation - reduces compliance burden	Currently difficult to comply with because of the confusion over the different speed limits	Yes, because it is easier to comply with
Better regulation - improves compliance with driver licensing requirements	Yes	Yes
Improves customer experience	Currently confusing for both drivers and Police	Yes, because it removes confusion
Safety is maintained or improved	No, there are safety issues as a result of differences in speed among vehicles	Yes, there would be a small but positive change

Simplifying the rules for tractors that can be driven on a Class 1 licence

Problem definition

- 128. The current regulations that govern the weight and type of tractors that can be driven by the holder of a Class 1 licence are difficult to understand, comply with, and enforce.
- 129. Tractors that can be driven on a Class 1 licence fall into a total of 10 regulatory categories, depending on licence stage (learner, restricted, or full), vehicle use (agricultural or non-agricultural), vehicle weight, speed limit, and whether the vehicle has a trailer attached.

Objective

- 130. The objective of this proposal is to remove the regulatory differences between the agricultural and non-agricultural tractors that can be driven on a Class 1 licence in order to simplify the rules.

Option 1 – status quo

131. The status quo allows drivers with a Class licence to drive tractors up to a certain weight and up to specified speed limits. The Rule currently differentiates between agricultural and non-agricultural vehicles and assigns different allowed weights and speeds to each. There is no evidence that there are different safety issues associated with the use of agricultural versus non-agricultural tractors that justifies different regulatory treatment.

Option 2 (preferred) – remove the regulatory differences between agricultural and non-agricultural tractors that can be driven on a Class 1 licence

132. Under the proposed approach, Class 1 licence holders would be authorised to drive any tractor with a gross laden weight of more than 6,000kg but not more than 18,000kg, or any combination vehicle (consisting of a tractor and a trailer) with a gross combined weight of not more than 25,000kg, if driven at a speed not exceeding 40 kph.

133. The table shows the difference between the status quo and the preferred option concerning the tractors that can be driven on a Class 1 licence..

Status quo	Proposed Option - Remove the regulatory differences between agricultural and non-agricultural tractors that can be driven on a Class 1 licence
Tractor - GLW 6001kg to 18,000kg @ up to 30 kph	Tractor GLW of 6001 kg to 18,000kg, @ up to 40 kph
Agricultural tractor - GLW 6001kg to 18,000kg @ up to 40 kph	
Agricultural tractor towing an agricultural trailer - GCW 25,000kg or less @ up to 40 kph	Tractor and trailer with a gross combined weight of not more than 25,000kg @ up to 40 kph
Tractor towing a trailer, that is being used in non-agricultural land management operations - GCW 25,000kg or less @ up to 30 kph	

GLW = Gross laden weight
GCW = Gross combined weight

134. Impacts are difficult to quantify but they are unlikely to be significant. There is no evidence that agricultural tractors and other tractors present different crash risks. These vehicles are responsible for a very small number of on-road accidents in the first place, both in terms of actual numbers and as a proportion of the total vehicle fleet. Simplification of the requirements will make compliance easier.

Criteria	Option 1 - <i>status quo</i>	Option 2 (preferred) – <i>remove the regulatory differences between agricultural and non-agricultural tractors that can be driven on a Class 1 licence</i>
Better regulation - reducing compliance costs	Currently the requirements are very complicated	Yes simplification will greatly improve the ability to comply
Better regulation - enabling better and easier compliance	Currently the requirements are very complicated	Yes simplification will greatly improve the ability to comply
Improving the customer experience	Currently very complex	Yes as it will be clearer
Maintaining or improving road safety	No significant safety issues currently	No change expected

Automatic renewal of general licences for some endorsement holders

Problem definition

135. Since 2011, most licence holders who obtain or renew an additional licence class or endorsement can also have their existing general licence renewed for 10 years at the same time. To enable that option, the Rule states that the minimum requirements of the application for the additional licence or endorsement must also satisfy the minimum requirements for renewing the existing general licence.
136. Those requirements include the capture of a new photograph of the driver. Some endorsements require a photograph to be taken, and so their general licence (which also requires a photograph) can be automatically renewed. However, some endorsements do not require a photograph to be taken so the driver has to return to an agent's and renew their general licence on its normal expiry date. This imposes additional compliance costs.
137. The anomaly is a consequence of the different requirements of endorsement applications – taxi and similar drivers require a photograph to be taken for the photo driver identification card (the card displayed on the dashboard) so their general licence can be automatically renewed (because the general licence requires a photograph to be taken). Other endorsement applications do not require the photograph to be taken, so they cannot have their general licence renewed automatically until they have a photograph taken.

Objective

138. The objective is to enable all holders of endorsements to qualify for automatic renewal of their existing general licence(s). The purpose is to reduce compliance costs and simplify the processes for drivers with endorsements.

Option 1 - Status quo

139. Passenger (P) endorsement holders who drive 'small' passenger service vehicles, such as shuttles and taxis, have to update their photo driver identification card, so

they meet the photograph prerequisite and can have their general licence automatically renewed.

140. P endorsement holders who drive 'large' passenger service vehicles, such as buses, are not allowed to have their general licences renewed, since there is no capture of a photograph for renewing their P endorsement. Instead, they are still required to renew their general licence on its normal expiry date, which imposes additional compliance costs. This also applies to the holders of (I) Driving Instructor, (O) Testing Officer, and (D) Dangerous Goods endorsements.
141. The status quo would retain the current anomaly where P endorsement holders who drive 'large' passenger service vehicles, as well as I, O, and D endorsement holders, have to apply separately for renewal of their general licences.

(Option 2 (preferred) - a photograph must be taken when a driver renews a 'large' P, I, O or D endorsement

142. This option requires a photograph to be taken when a driver renews a 'large' P, I, O or D endorsement. This will allow the driver's full Class 1 or 6 licence and any of Classes 2 to 5 licence(s) to be renewed at the same time.
143. As the number of affected endorsement holders is small at around 15,000, if the IT cost for system changes is more than \$283,000, then the benefits will be unlikely to justify the cost. Further work will be required to confirm the cost of the IT change.

Improving oversight of approved course providers

Problem definition

144. The NZ Transport Agency approves individuals or organisations to deliver training courses covering advanced driving skills or endorsement related driving skills. There are currently more than 500 approved course providers in New Zealand. The Rule is unclear about the ability of the NZ Transport Agency to manage course providers in the public interest, including suspending or revoking providers when necessary. The Driver Licensing Review identified a number of areas where benefits could be achieved by clarifying or expanding the powers of the NZ Transport Agency relating to approved course providers. These include:
- the NZ Transport Agency has no explicit authority to impose conditions in addition to the Statement of Approval Conditions on existing course providers as a result of audit or in the general course of business; this limits the ability of the NZ Transport Agency to be responsive to changes in the licensing environment, or to address the specific circumstances of any one provider or group of providers
 - the NZ Transport Agency does not have the authority to consider information on the history of an applicant in the approval process (e.g. previous misconduct) or to seek additional information from applicants seeking to be approved as course providers; this limits the ability of the NZ Transport Agency to vet applicants seeking to become approved course providers
 - the Rule does not provide the power to immediately suspend or revoke approved course providers in the interests of public safety or to protect the public from fraud, misconduct or criminal activity; additionally, the wording and clarity of clauses in the Rule relating to information requirements, application processing and approval, and suspension and revocation of approved course

providers could be improved – the NZ Transport Agency can only suspend or revoke an approved course provider when it fails to address requirements arising from an audit or inspection.

Objective

145. The objective is to clarify or expand the powers of the NZ Transport Agency relating to approved course providers to allow it to better manage approved course providers. The NZ Transport Agency cannot suspend or revoke an approved provider even where there is, criminal activity, misconduct or serious fraudulent behaviour.

Option 1 - Status quo

146. The status quo has some major gaps in the NZ Transport Agency's ability to effectively manage course providers. To date, there have been no circumstances where the identified gaps in the Rule have affected the NZ Transport Agency's ability to take action. However, other training sectors have experienced problems with fraudulent course providers and it could happen in the driver licensing sector.

Option 2 (preferred) – Expand the powers of the NZ Transport Agency to manage approved course providers

147. Although there are some powers available to the NZ Transport Agency for managing approved course providers, there are gaps where additional clarity and expansion of powers will aid in the management of course providers. The proposal is likely to increase confidence in the overall integrity of the providers operating in the system.
148. The proposed amendments would provide the NZ Transport Agency with the ability to:
- immediately suspend or revoke approved provider status where a provider has acted inappropriately, illegally or contrary to the conditions under which they are approved
 - allow consideration of information on the history of the applicant in the approval process
 - impose conditions on existing course providers
 - seek additional information from applicants to be an approved course provider.
149. Amendments would also:
- clarify the power to revoke or suspend an approved course provider, subject to failing a direction arising from an audit or monitoring, similar to the power that already exists in relation to approved courses
 - provide appropriate safeguards for approved course providers subject to sanctions, such as a right of review.

150. The following table compares the options.

Criteria	Option 1 - <i>status quo</i>	Option 2 (preferred) –
Better regulation - reducing compliance costs	Currently there are gaps that can lead to quality issues	Yes, it clarifies the powers of the NZTA to enable them to maintain standards
Better regulation - enabling better and easier compliance	No change	Yes, it provides clarity and powers to the NZTA to ensure that requirements are complied with
Improving the customer experience	No change	Yes, if the standards of approved course providers are ensured
Maintaining or improving road safety	There may be safety issues currently	Yes, as standards of approved course providers are ensured

Reviewing the ‘stand-down’ requirements for (P) passenger endorsement

Problem definition

151. The two year ‘stand down’ allows time for drivers to gain driving experience on New Zealand roads and provides a reasonable period in which their traffic and criminal offending can be monitored.
152. There are concerns that the ‘stand-down’ period may restrict the supply of taxi and particularly bus drivers needed to support the increasing use of public transport. There are also concerns that the stand-down requirement limits the ability of experienced overseas taxi and bus drivers to come to New Zealand to work in the sector.

Objectives

153. The objective is to consider whether the current requirements that any person holding a P endorsement be competent and fit to drive passengers for hire would be impacted negatively if the two year ‘stand-down’ was reduced.

Option 1 (preferred) - Status quo

154. Before a person can be granted a P endorsement in order to drive a taxi, shuttle or bus for example, the applicant must have held a New Zealand full driver’s licence (other than Class 6 motorcycle licence) for at least two years. An overseas licence is not included for this purpose and overseas drivers must convert their licence to a New Zealand licence and hold it for two years as well.
155. The (P) endorsement process also includes a two-stage ‘fit and proper person’ check. In the first stage, any applicant with a qualifying conviction specified in the Land Transport Act is barred from applying for, or holding an endorsement. The second stage allows the NZ Transport Agency to make an assessment of an applicant’s suitability to have a (P) endorsement and looks at whether the applicant has a good traffic safety record or has any offending that might indicate a risk to passenger safety (for example, sexual offending).

156. The 'stand-down' period of two years between gaining a New Zealand full licence and applying for a (P) endorsement is designed to give young drivers the opportunity to obtain sufficient experience as a full licence holder (for example, experience driving at night and driving with passengers) before driving passengers for hire.
157. For overseas drivers who convert their licence to a New Zealand licence, the two-year stand-down allows time for the drivers to gain driving experience on New Zealand roads and provides a reasonable period in which their traffic and criminal offending can be monitored. It also provides time for a medical practitioner to gain some familiarity with their health to provide a medical certificate.

Issues with the status quo

158. There are concerns that the two year licence prerequisite may be restricting the supply of professional drivers. In particular, there are concerns around the supply of bus drivers required to support the increasing use of public transport. Under the current situation, the effective minimum age for a P endorsement holder is 19 years and six months⁹. There are also concerns that the stand-down requirement hinders the ability of experienced overseas drivers to come to New Zealand and work in the sector.

Option 2 – Drivers can apply for a passenger endorsement after holding a full licence for 12 months

159. As part of addressing the transport industry concerns about the shortage of drivers, consideration was given to reducing the stand-down period of two years between gaining a New Zealand full licence and applying for a P endorsement. (This option would exclude drivers who convert overseas licences to New Zealand licences and drivers under the age of 25).

There may be reduced safety if the stand-down period is reduced

160. There is insufficient evidence to suggest that road safety outcomes would be maintained if the current two year stand-down period was reduced.
161. Overseas research suggests there is a relationship between bus driving experience (number of years driving) and crash risk, but is inconclusive on the relationship between age and crash risk - some studies concluded younger bus drivers have a higher crash risk, while others did not. New Zealand crash risk data for all licence holders shows younger drivers are over-represented across all crash types.
162. For overseas drivers, no research was found on the crash risk of bus drivers or heavy vehicle drivers (as a proxy for bus drivers) who were from overseas and driving in a new country. Further research in these areas would be required to reach any conclusion.

Cost benefit analysis

163. A cost benefit analysis indicated that benefits from Option 2 would be cancelled out due to a probable increase in the safety risk.

⁹ As long as a driver has completed an advanced driving course. If the course has not been taken the age is 20 years.

Criteria	Option 1 – (preferred) <i>status quo</i>	Option 2 - <i>Drivers can apply for a passenger endorsement after holding a full licence for 12 months</i>
Better regulation - reducing compliance costs	No change	Reduction
Better regulation - enabling better and easier compliance	No change	No change
Improving the customer experience	No change	No change
Maintaining or improving road safety	No change	No, safety is likely to be reduced as drivers have less experience e.g. driving at night, carrying passengers

Summary of consultation

164. In developing proposals to amend the Rule, the Ministry of Transport and the NZ Transport Agency undertook an extensive engagement process with key stakeholders and participants in the transport sector. This has included workshops with reference groups and specific discussions with some stakeholders.
165. In April 2016, the Associate Minister of Transport released a discussion document, *Driver Licensing Review Discussion Paper*, for public consultation from Tuesday 19 May 2016 for six weeks, concluding on 2 June 2016. The discussion paper was made available on the Ministry of Transport's website, with a link to the document from the NZ Transport Agency's website.
166. There were 77 submissions received on the discussion document.
167. Organisations making submissions included:
- AA Advocacy
 - NZ Medical Association
 - NZ Association of Optometrist
 - Royal Australian and New Zealand College of Ophthalmologists
 - Royal New Zealand College of GPs
 - Insurance Council of New Zealand
 - Road Transport Forum
 - Federated Farmers
 - VINZ
 - VTNZ
 - RTA
 - Optometrists
 - Bus and Coach Association
 - NZ Police
168. The categories and numbers of submissions received on the discussion document are indicated in the table below:

Submitter type	Number of submitters
Industry	32
Individuals	25
Associations	14
Central Government	4
Community advocacy	1
Miscellaneous	1

The main themes raised by submitters

169. Submitters were generally supportive of the proposed changes and the intention to improve the efficiency of the New Zealand driver licensing system and the productivity of the commercial driving sector.
170. Some submitters expressed concerns that the review was focusing too much on reducing costs and not enough on safety. This was expressed within the general comments and in the comments on specific proposals, such as in reaction to the vision testing proposals. Safety considerations also featured highly in justifications for option choices.
171. Along with support for reduced compliance time and costs, submitters also showed significant support for changes that would make compliance easier and less complicated.
172. The main themes raised in submissions were as follows.
- *Moving to a digital licensing environment:* of those who supported a change, 26 out of 66 supported the option to remove vision testing at each licence renewal (Option 2 in this paper); 27 out of 66 supported the option to remove repeated vision testing at each stage of the GDLS by indicating that if eyesight had been tested within 5 years then no further testing was needed (Option 3 in this paper); however, some were uncomfortable with any reduction in eyesight testing (13 out of 66). These submitters included significant groups such as the Insurance Council of New Zealand (ICNZ), New Zealand Automobile Association (NZAA), NZ Police, general practitioners and ophthalmologists associations, and optometrists
 - *Simplifying the pathway from the Class 2 to the Class 5 licence:* the preferred option was Option 3, which proposed removing some learner licence classes and allowing drivers to begin learning to drive the next highest licence class under supervision. This option received the most support, with 53 percent of those who commented supporting Option 3 or a combination of it with other options. The main reason given for this was to speed up the system and address driver shortages.

- However, 24 percent of those who made a choice preferred the status quo of two pathways for progressing to a Class 5 licence (practical test or approved course). These submitters see the status quo as protecting driver safety. In particular, practical experience was highlighted as important in achieving safe drivers.
- Submitters also took the opportunity to propose a number of other options, most in support of simplifying the pathway from the Class 2 to the Class 5 licence. Most significantly, the Road Transport Forum NZ (RTF) made an alternative proposal that was endorsed by a number of other submitters including the National Road Carriers, Federated Farmers and Civil Contractors. Essentially the RTF proposal supports a modified version of Option 3, combined with an express pathway for 25s (Option 4).
- *Reviewing the Accelerated Licensing Process (ALP)*: The discussion document proposed removing the ALP from the Driver Licensing Rule because it is rarely used, costly, and may have safety implications. Of those who submitted a clear view on this, 75 percent agreed that the ALP should be removed.
- *Review of the requirements for licence endorsements for drivers of 'special-type vehicles'*: of the 46 submitters who commented on this, 23 supported removing the endorsements, arguing that workplace training is adequate or even better than endorsements, making endorsements an expensive duplication of resources. However, 20 submitters commented that the endorsements should be kept, as a source of greater safety, legitimacy, and useful extra training. Endorsements were also highlighted as a source of personal pride for drivers who may have no other qualification.
- *Speed restrictions for tractors and special-type vehicles*: of the 41 submitters who commented, a large majority (35) supported the proposed option. Most submitters thought a uniform speed limit would make compliance easier, as it is easier to remember, understand, and enforce.
- *Simplifying the rules for tractors that can be driven on a Class 1 licence*: of the 30 submitters who commented on this, 23 supported the proposed approach, once again, mostly because it would improve clarity and therefore compliance.
- *Reviewing the 'stand-down' requirements for (P) passenger endorsements*: The discussion paper proposed either continuing with the status quo or reducing the 'stand down' period to one year, (excluding drivers who convert overseas licences or drivers under the age of 25). Of the 42 submitters who commented on this section, 30 supported the status quo, arguing that it protects the safety of passengers and the public. Many of these submitters commented that the 'stand down' period is appropriate for its purposes of providing experience and time for monitoring. Ten submitters supported reducing the stand down period, predominantly due to concerns around driver shortages.
- *Automatic renewal of general licences for some endorsement holders*: Of the 33 submitters who stated a clear preference, 31 agreed with the proposed approach. The proposal did not appear controversial, and where comments were made it was simply to say it was a common sense approach that would reduce costs.
- *Improving oversight of approved course providers*: of the 41 submitters who offered a clear preference on this, 38 were in favour of the proposal, commenting that it would improve the integrity of course providers, and therefore road safety.

173. Some submitters raised issues that are beyond the scope of this review of the Rule. These were:
- Class 1 and 2 licence weight inconsistencies
 - consideration of the medical aspects of fitness to drive, other than eyesight
 - use of independent practical assessments
 - establishment of a Bridge Engineering Self Supervision System (BESS) endorsement
 - establishment of a Load Pilot endorsement
 - automatic progression to full licence from a clean three year old restricted licence
 - modernisation of the legislative framework, to accommodate developing technologies
 - integration of driver licence information with other government agencies through the 'Integrated Data Infrastructure'
 - minor out of scope issues not applicable to the licensing issues and legislation being considered.
174. There will be a further round of public consultation on the proposed changes, in the form of a draft Rule.

Conclusions and recommendations

175. There is scope for changes to the Land Transport (Driver Licensing) Rule 1999 to modernise it and ensure it remains fit for purpose without affecting road safety. In addition, there is scope to remove the requirement for repeated vision testing at licence renewal without compromising safety, in order to allow eventual online licence renewal.
176. The proposed options in the discussion document are supported by evidence and have public support with the exception of the reduced vision testing, for which concerns have been raised by medical organisations, the insurance industry and the NZ AA.
177. *Vision testing:* evidence does not support repeated testing of vision at renewal. The practice of most other jurisdictions is for far less frequent testing of eyesight – usually limited to first time entry into the system then from 70 or 80 years of age. We are recommending a similar option to other jurisdictions - vision testing at entry to the system and no testing on licence renewal until the age of 75 when older driver provisions begin.
178. *Heavy vehicle licensing:* in order to streamline and simplify the pathway from the Class 2 to the Class 5 licence we are recommending the removal of Classes 3 (3L,3F), 4L and 5L. In order to mitigate any safety issues that might arise from the reduced number of licence stages, we are recommending the strengthening of the practical tests and approved courses; and that drivers be allowed to begin learning at the next level under supervision. Further research on the feasibility and cost of independent driver assessments will be undertaken as part of a broader focus on maintaining the integrity of the driver licensing system.

179. *Removal of the Accelerated Licensing Process*: policy investigation found that the ALP is seldom used, expensive, and may produce less safe drivers. Public consultation showed that the public does not believe it should continue to be used. The recommended option is to remove the ALP.
180. *Removal of the endorsements of special-type vehicles*: there is no evidence that endorsements for drivers of special-type vehicles, on top of occupational training, significantly improve safety. This means the costs associated with the endorsements are unjustified. The recommended option is to remove endorsements for drivers of special-type vehicles.
181. *Standardise the speed limits for all tractors and special-type vehicles*: the current situation is complex and confusing and as these vehicles have a very low crash incidence, there appears to be little benefit in maintaining the status quo. The recommended option is to standardise the speed requirements for all tractors and 'special-type' vehicles to 40kph.
182. *Standardise the allowable weight limits for Class 1 licences*: similar to the above, the current situation is complex and confusing. The proposal will simplify compliance and pose no significant risk to road safety. The recommended option is to standardise the weight limits allowed on a Class 1 licence across all tractors.
183. *Require a photo to be taken when renewing an endorsement to allow general licences to be renewed at the same time*: although there is a cost associated with implementing this change, it would reduce the cost and complexity of licensing to the user. It also aligns with the Government priority of standardising regulatory requirements and reducing compliance costs. The recommended option is to amend the Rule to require a photo when renewing endorsements.
184. *Make the powers of the NZ Transport Agency explicit for ensuring the standard and legality of approved course providers*: There are currently some actions available to the NZ Transport Agency for managing approved course providers. However, the clarification and expansion of the available actions would improve that management, leading to safer drivers. The recommended option is to expand the Rule and make explicit the powers of the NZ Transport Agency for ensuring the standard and legality of approved course providers. A right to review will be included.
185. *Maintain the two-year stand down period prior to gaining a (P) endorsement*: the stand down period is designed to ensure that drivers have sufficient driving experience to ensure that they do not compromise the safety of paying passengers. Evidence suggests that younger drivers are disproportionately likely to be involved in road accidents. The stand down period is not considered the main reason for the driver shortage. The recommended option is to retain the status quo of a two year 'stand-down' period prior to gaining a (P) endorsement.

Implementation plan

186. Any changes agreed by Cabinet will require amendment to the Land Transport (Driver Licensing) Rule 1999. The proposed changes are expected to come into force in April /May 2017.
187. For the enhancements to approved courses and practical tests, the NZ Transport Agency will allocate resources into research and design. It is possible this would mean a delay between the changes coming into force and the rollout of the new courses and tests.

188. The NZ Transport Agency will update its IT systems to reflect changes to the automatic renewal of general licences, online licensing renewals, and changes to the Driver Licensing Register for the changes in licensing and endorsements. As revenue is likely to decrease with the removal of some of the licence classes, fee increases are expected. They have not yet been quantified and will be determined in 2017.
189. The NZ Transport Agency will communicate the changes to industry, course providers, and the public. An interim Communications Plan has been prepared for the stages between consultation and Government decisions and a further plan will be prepared for the period after decisions are made and the Rule comes into force.

Monitoring, evaluation and review

190. A monitoring and evaluation programme is being developed by the Ministry and the NZ Transport Agency to assess the impacts of these changes. There will also be specific engagement with industry and other stakeholders to assess performance and other issues that may arise.
191. In addition, the Agency and the Ministry of Transport and other agencies undertake regular studies and analysis that will be used to monitor and evaluate the current changes. These include:
- Crash Analysis System (CAS), which collates data on all road crashes involving injury
 - Commercial Vehicle Investigation Unit reports
 - Road user charges data
 - Vehicle licensing data
 - Reports by the NZ Transport Agency Insights and Analysis Unit
 - Reports by the Ministry of Transport's Financial, Economics and Statistical Analysis team.