



14 June 2018

Mr Shane Rattenbury MLA
Minister for Justice, Consumer Affairs and Road Safety
Legislative Assembly for the ACT
GPO Box 1020
CANBERRA ACT 2601

Dear Minister

ACT Discussion Paper: Reviewing the Process from L Plates to No Plates

The NRMA welcomes the opportunity to provide a submission to the ACT Discussion Paper: *Reviewing the Process from L Plates to No Plates*.

The NRMA is the largest membership organisation in Australia representing over 2.6 million Members. We are a mutual providing transport and tourism services to 5 million customers nationwide. The NRMA works with policy makers and industry leaders to advocate for increased investment in transport solutions to make mobility safer and easier, provide access to affordable travel options and experiences, and ensure communities remain connected to business and employment opportunities.

The NRMA has been a strong advocate for road safety for over 98 years. The NRMA has championed road safety improvements including seatbelts in cars, greater investment in road infrastructure, and high visible policing to help keep Australians safe while on the road. Young driver safety is no exception, with our continued investment in in-school programs and learner driver training courses.

As mentioned in the *Discussion Paper*, research both locally and internationally has proven that comprehensive and evidence-based Graduated Licensing Schemes (GLS) are effective in improving road safety outcomes for young drivers. The NRMA believes that young drivers in the ACT should be offered the same opportunity to develop their driving skills in a safe environment and ultimately reduce their crash exposure.

The NRMA supports in principle the majority of the proposed changes to strengthen the graduated licensing scheme in the ACT. Areas of divergence from the current system or proposed changes are outlined below. The NRMA has also summarised key recommendations to the review over the page.

Passenger Restrictions

The NRMA does not support a 24 hour prohibition of peer aged passengers or late night driving restriction as proposed in the paper. The NRMA believes these may have the unintended consequence of restricting the mobility of young people, particularly those that car pool to places of employment. The NRMA believes that a combined night-time and peer passenger restriction should be introduced, similar to those that currently exist in NSW and Queensland.

Given that passenger distraction features more significantly during night time crashes in the ACT, the NRMA believes this is a logical compromise between young driver independence and safety. It also



ensures consistency between the ACT, NSW and Queensland, which continues to be a considerable cause for confusion among motorists. Exemptions should also apply in exceptional circumstances.

Driver Distraction

Research shows that young drivers are at greater risk of being distracted by mobile phone use than full licence holders. The demographic is also at greater risk because they use their phone more often.^{1 2} Given this, the NRMA has advocated for a ban on all mobile phone use by learner and provisional licence holders in the ACT in its [Can't Talk. Driving](#) report (see attached). The NRMA is pleased to see this being considered as part of the changes to the ACT GLS and supports this measure.

Consideration should also be given to trialling telematics to assess the behaviour of young drivers, as proposed in the NRMA's *Come Home Safe* report (see attached). The NSW Government recently announced a trial of in-car technology aimed at assisting young drivers and rewarding good driver behaviour. The NRMA believes there is untapped potential for technology solutions to make our vehicles and roads safer and encourage drivers to change or regulate their driving behaviour.

Support Programs for Disadvantaged Learner Drivers

Mandating the minimum number of learner driver hours is vital to improving the safety outcomes of young drivers. However, this may be a barrier for disadvantaged groups in our community.

Less than half of eligible Aboriginal Australians hold a driver's licence, compared to over 70 per cent of the non-Indigenous population.³ Lower rates of licencing, and therefore an ability to drive, reduces access to jobs, education, social activities as well as health and medical treatment.

Limited access to a licensed driver for supervised driving practice or a registered vehicle, as well as outstanding fines all lead to lower rates of licencing and higher rates of unlicensed driving for many Indigenous Australians.

Unlicensed driving is a substantial contributing factor to the high rate of imprisonment of Indigenous people. One in 20 Indigenous people in gaol are serving a sentence for unlicensed driving and other driving related offences.

It is estimated that the cost of incarceration equates to up to \$100,000 per person. The annual cost of Indigenous unlicensed or disqualified drivers to the NSW through the Corrective Services, Police and the courts is \$17-\$19 million. This estimate does not include the social and economic impact to these communities of road fatalities that may occur as a result of unlicensed driving, estimated at approximately \$7 million for each fatality.

Boosting rates of licencing amongst the Indigenous community offers a simple and effective justice reinvestment program. End-to-end programs that progress vulnerable communities from pre-learner licence to provisional licence improve safety, reduce offending and imprisonment and improve quality of life. In the NRMA's experience end-to-end programs cost \$5,000 per completion.

While the program remains in its infancy, 83 per cent of participants have used their new licence to access a new job opportunity, while the remaining 17 per cent have used their new license to access

¹ Hasque, M. & Washington, S. (2014). A parametric duration model on reaction times of drivers distracted by mobile phone conversations. *Accident Analysis & Prevention*, 62, 42-53.

² Hasque, M. & Washington, S. (2014). The impact of mobile phone distraction on the braking behaviour of young drivers: A hazard-based duration model. *Transportation Research Part C: Emerging Technologies*, 50, 13-27.

³ Audit Office of NSW (2013) NSW Auditor-General's Report, Performance Audit, Improving legal and safe driving among Aboriginal people.



education. By allocating funding to proven driver licensing programs we are able to create a positive cycle amongst a community, by securing licencing for an individual and in-time allowing those individuals to serve as a mentor or supervisor to other learner drivers within their community.

The NRMA believes that funding should be allocated to support Learner Driver Mentor Programs in the ACT for Indigenous and disadvantaged communities, particularly focused on support for Indigenous youth and at-risk communities.

NRMA Recommendations

In addition to the above mentioned changes, the NRMA proposes the changes below to be considered as part of the new ACT GLS:

- The minimum number of hours should be consistent with NSW – 120 hours including 20 hours of night-time driving.
- ACT learner drivers should be offered credit for professional driving lessons as is the case for NSW learner drivers in the 3 for 1 log book credit.
- The Safer Drivers Course program that operates in NSW should be part of the ACT learner period.
- The minimum length for the P1 period should be 12 months.
- The ACT's Competency Based Testing and Assessment regime should be evaluated to determine its effectiveness.
- A passenger restriction (under 21 years) should apply between 11pm – 5am, as currently in required for P1 drivers in NSW.
- Consideration should also be given to applying a zero tolerance to speeding, whereby a speeding offence results in a P1 licence being suspended for at least 3 months, as is the case for NSW.
- High powered vehicle restrictions should be considered.
- Funding should be allocated to support Learner Driver Mentor Programs to assist disadvantaged communities.
- Investigate the potential for technology solutions to make our vehicles and roads safer and encourage young drivers to change or regulate their driving behaviour.

Like any other road safety measure, the new ACT GLS must be independently evaluated to ensure its effectiveness in reducing road trauma of young drivers. This also extends to evaluating the effectiveness of the Road Ready Course in conjunction with the new GLS measures introduced. The evaluations must also be made publicly available.

The accreditation of professional driving instructors in the ACT must also be explored in order to adequately support changes to the ACT's GLS. To the NRMA's knowledge, there is currently only one authorised training provider in the ACT that offers the nationally accredited *Certificate IV in Transport and Logistics*. This course is a mandatory requirement for all driving instructors in the ACT.



The NRMA believes that the ACT Government should allow other training providers to be accredited. This will provide potential driving instructors with more training provider options and will hopefully lead to regularly scheduled training courses.

The NRMA is committed to improving the safety of young drivers in the ACT and will work with the ACT Government to help reduce the road trauma of young people.

Should you require any further information about this submission, please contact Carlita Warren, Senior Manager, Policy & Research on (02) 9276 7268 or carlita.warren@mynrma.com.au.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Peter Colacino". The signature is fluid and cursive, with a long horizontal stroke at the end.

Peter Colacino
Executive General Manager, Partnerships & Growth



The NRMA's Response: Proposed changes to the ACT Graduated Licensing System

	ACT Current	Proposed ACT Changes	NRMA Position
Learner Period			
Min age	15 years 9 months	No change	Support
Min length	6 months	12 months	Support
Expiry	2 year	5 years	Support
Tests	Road Ready Course and road knowledge	No change	<p>The NRMA supports a road knowledge test and the Road Ready course.</p> <p>An evaluation of the Road Ready Course found some positive influence on young driver behaviour, however a further evaluation is required.</p> <p>Given that the Road Ready Course will now be part of a revised ACT GLS, the NRMA believes that the Road Ready course must be evaluated in conjunction to an independent review of the new ACT GLS. Results of the evaluation must be made publicly available.</p>
Penalties	12 points in 3 years	4 points in 3 years	Support
Max speed limit	Sign posted	No change	Support
Supervised driving logged	0 but 50h recommended	100h including 10h night	<p>The NRMA supports mandating the minimum number of learner driver hours. However, we believe that the minimum number of hours should be consistent with NSW – 120 hours including 20 hours of night time driving.</p> <p>Professional driving instruction is crucial during the learner driver period. The NRMA believes that ACT learner drivers should be offered credit for professional driving lessons as is the case for NSW learner drivers in the 3 for 1 log book credit.</p> <p>The NRMA also believes that the Safer Drivers Course that operates in NSW should be part of the ACT learner period.</p>
P1 Period			
Min age	17 years	No change	Support
Min length	3 years	No change	The NRMA believes that the minimum length for the P1 period should be 12 months. This would bring the ACT in line with the majority of the other jurisdictions.
Test to get P1		Driving test or CBTA and HPT	The NRMA supports hazard perception testing for provisional licensing and believes that in order to progress to a provisional licence learner drivers



	Driving test or CBTA		<p>need to pass a driving test and a hazard perception test.</p> <p>The NRMA believes that the ACT's Competency Based Testing and Assessment regime should be evaluated to determine its effectiveness.</p>
Passenger restrictions	No	One peer passenger only (16-24 years)	<p>The NRMA does not support a 24 hour prohibition of peer aged passengers.</p> <p>The NRMA supports a passenger restriction (under 21 years) applying between 11pm – 5am, as currently applies to P1 drivers in NSW.</p> <p>Given that passenger distraction features more significantly during night time crashes in the ACT, the NRMA believes this is a logical compromise between young driver independence and safety. It also ensures the consistency between the ACT, NSW and QLD.</p> <p>Exemptions should also apply in exceptional circumstances.</p>
Late night restriction	No	12am – 5am	<p>The NRMA supports night driving restrictions only as a component of passenger restrictions.</p> <p>The NRMA believes that late night restrictions may have a negative effect on parents and employment opportunities for young people.</p>
Max speed limit	Sign posted	No change	Support
Mobile phone	Hands free permitted	No mobiles	The NRMA supports a ban of all mobile phone use for all learner and provisional licence holders.
BAC	Zero	No change	Support
High powered vehicle restriction	No restriction	No change	Given the higher crash risk for young drivers of high performance vehicles, the NRMA believes that restrictions on the use of high powered vehicles should be considered, as is the case in NSW.
Penalties	4 points in 3 years 8 points in 3 years if complete Road Ready Plus	4 points in 3 years	<p>The NRMA supports the proposed change.</p> <p>Consideration should also be given to applying a zero tolerance to speeding, whereby a speeding offence results in P1 licence being suspended for at least 3 months, as is the case for NSW.</p>
P2 Period			
Min age	N/A	18 years	Support
Min length	N/A	2 years	Support
Tests to get to P2	N/A	N/A	Support
Mobile phone	N/A	No mobiles	The NRMA supports a ban of all mobile phone use for all learner and provisional licence holders.
Max speed limit	N/A	N/A	Support



BAC	N/A	Zero	Support
Vehicle	N/A	No restrictions	Given the higher crash risk for young drivers of high performance vehicles, the NRMA believes that restrictions on the use of high powered vehicles should be considered, as is the case in NSW.
Penalties	N/A	4 points in 3 years	The NRMA supports the reduced number of demerit points during the provisional period. Consideration must be given to ensure consistency between other states such as NSW.