



Graduated Licensing Scheme Review

RACT Submission to Department of State Growth

February 2020

The Royal Automobile Club of Tasmania

RACT enjoys a trusted position and extensive market penetration in the community. More than 200,000 Tasmanians are RACT members.

Formed in 1923, RACT is an apolitical and independent transport, infrastructure, road safety, tourism and mobility advocate.

It is committed to supporting and furthering the interests of Tasmanians and does this through a comprehensive program of consultation, education, awareness and public advocacy.

RACT is represented in a number of stakeholder reference organisations in Tasmania and undertakes liaison with government and other groups. It also has three regional advocacy committees which are made up of local volunteers and other relevant stakeholders.

RACT's advocacy activity is defined by a series of public policy documents developed and endorsed by RACT's Advocacy Committee and Board.

These policies have been informed by history, experience, statistical analysis, consultation, industry knowledge and, most importantly, our members.

Nationally, RACT is a constituent member of the Australian Automobile Association (AAA) which represents some 8 million Australian motorists.

Internationally, RACT has joined with other Australian motoring organisations as a member of the Fédération Internationale de l'Automobile (FIA) to work on road safety and related issues at a global level.

Graduated Licensing Scheme Review

RACT's Mobility Strategy

The RACT Advocacy Strategy outlines our road safety vision for Tasmania. It seeks to increase the safety of our more at-risk road users – including learner drivers – through the introduction of safer regulations under a Graduated Licensing Scheme.

Background

GLS Background

There are three stages to the GLS in Australia, including standard, enhanced and exemplar.

1. Standard includes 50 hours of supervised driving and a three year provisional period.
2. Enhanced involves 80-100 hours with 10 at night, a restriction of multiple passengers on P1 and a three year provisional period.

3. Exemplar is 100-120 hours, with 15-20 at night, a four year provisional period and restrictions of passengers on P1.

In early 2019, the Department of State Growth announced a move to the enhanced GLS level by the end of 2020. This includes:

1. A total of 80 hours supervised driving – with 15 hours of night driving and a reduction in peer passengers – for learner drivers. This includes a mandatory 30 hours on L1 and 50 hours on L2.
2. Restrictions on more than one peer passenger aged 21 and under (day and night) during the P1 phase for drivers aged under 25. This would include discretionary exemptions based on work, educational or familial needs.
3. Restrictions on the use of hands free mobile phones during the learner and provisional licence periods.
4. Introducing a computer-based hazard perception test in order to progress to a P1 licence.
5. The Department is also exploring the long-term goal of introducing the exemplar GLS model in Tasmania.

In late 2019, the Department announced it was considering additional changes to the GLS that built on those already announced. These include:

1. The creation of one learner period and removal of L2 Practical Driving Assessment (L2 Assessment).
 - Learners will be required to record 80 hours of supervised driving including 15 hours at night and hold a learner licence for a minimum of 12 months (this reflects a combination of L1 and L2 phases).
2. Implementing a single learner licence card and single provisional licence card.
3. Automating the Safer Driver Reward initiative.
4. Provision of funding for an additional one hour lesson to learner and their supervisory drivers through the Keys2Drive program.
 - Provided as an offset to support introduction of 80 hours and reduce impact of the removal of L2 Assessment on ADAs.
5. The requirement of P2 drivers to display P plates. Currently P2 drivers are not required to display P plates.
6. Tougher penalties to be considered for P2 drivers if total ban on mobile phones not extended to P2 phase.
7. The removal of speed restrictions for L1, L2 and P1 drivers
 - Speed restrictions are being reconsidered as part of the creation of one learner period.

Young Drivers: Background

1. RACT considers young drivers to be vulnerable road users as they are over-represented in serious casualty crashes (Department of State Growth, 2020).
 - A lack of experience, risk-taking tendencies, driving at high-risk times and distractions all contribute to the elevated crash risk for young novice drivers, particularly during the P1 phase (RACQ, 2019).
 - Statistically, the learner period is the safest in any driver's life, but the most dangerous period for novice drivers is the moment they pass their provisional driving test (Keys2Drive, 2019).
2. Tasmania has the oldest vehicle fleet in Australia, which results in lower safety ratings and increased crash risk (ABS, 2019).
 - Furthermore, young drivers tend to drive the oldest and least safe cars on Australia's roads (ANCAP, 2019).
3. In terms of the removal of speed restrictions, the Australian GLS Framework indicates that some jurisdictions apply maximum speed limits on learner and provisional drivers, which are sometimes lower than signposted limits (NSW Government, 2014).
 - One position taken on this matter is that this restriction creates speed differentials between vehicles that can increase crash risk, meaning they should not be included in GLS models.
 - Some states that did have reduced speed limits for novice drivers have increased them and have reported no increase in crashes.
 - However, jurisdictions that currently apply lower speed limits for novice drivers believe that they are effective risk reduction measures, especially for P1 drivers.
 - Additionally, police have also commented about the difficulty in enforcing this restriction especially in regional areas.

4. Current novice speed restrictions in Tasmania are:
 - L1: 80km/h
 - L2 and P1: 90km/h in 90km/h and 100km/h zones and 100km/h in 110km/h zones.
5. Specifically, Tasmania's learner driver restrictions are largely unenforceable by police as they display the same L-plates (Department of State Growth, 2020).
 - There are also issues surrounding public opposition, awareness and compliance with the current restrictions.

Young Drivers: Evidence

1. Australian road trauma data from 2015 shows that deaths among the 15-24 age group dropped by 29% over the previous 10 years. Each Australian jurisdiction has achieved reductions through the introduction of GLS models (NSW Government, 2014).
2. Young Tasmanian drivers, aged 16-25, are on average involved in 25% of serious casualty crashes per year, despite only comprising 12% of the Tasmanian population (Department of State Growth, 2020).
3. By comparison, elderly road users, aged 65 and over, make up 16% of serious casualties on average per year while being about 20% of the Tasmanian population.
4. After receiving their provisional licences, the crash risk for young drivers increases 20-30 times, until it gradually decreases after six to 12 months of solo driving (Keys2Drive, 2019).
 - After 12 months of driving, new drivers almost halve their initial crash rate and their safety continues to improve for several years after licensing (SA Government, 2020).
5. The average age of Tasmanian vehicles is 12.9 years (ABS, 2019).
 - ANCAP research shows vehicles older than 15 years are involved in 36% of fatal crashes in Australia, with vehicles five years old or newer involved in 12% (ANCAP, 2019).
6. Almost 51% of RACT members surveyed in 2018 opposed an increase to supervised driving time for learner drivers. However, 83% supported 15 hours of night driving.

Position

RACT supports the Department of State Growth's additional amendments to the GLS, including:

1. The creation of one learner period and removal of L2 Practical Driving Assessment (L2 Assessment), with learners required to: record 80 hours of supervised driving, including 15 hours at night, and hold a learner licence for a minimum of 12 months.
 - This includes support for the provision of offsets for learner drivers to acquire their required hours and to balance the removal of the L2 assessment for ADAs.
2. Implementing a single learner licence card and single provisional licence card.
3. Automating the Safer Driver Reward initiative.
4. Provision of funding (subsidy) for an additional one hour lesson to just learner drivers, not their supervisors, through the Keys2Drive program.
 - RACT believes that requiring a supervisor to commit to two sessions will not get the required uptake, with K2D uptake in Tasmania currently low (7% of learners access the free lesson)
 - The learner should have the option to undertake the extra lesson either back-to-back or at another suitable time, in the interest of flexibility.
5. The requirement of P2 drivers to display P plates. These should be the proposed green and white P-plates.
6. Tougher penalties for P2 drivers using a hands free mobile phone, should a total ban on mobile phones not extend to P2 drivers.

However, the organisation but would like to make the following recommendations to proposed speed restriction changes:

1. RACT proposes that the new combined learner phase, created through removing the L1 and L2 phases, should have a speed restriction akin to the current L2 phase (10km/h below the posted limit for speeds above 90km/h).

2. The P1 phase would remain the same as at present (10km/h below the posted limit for speeds above 90km/h).
3. Drivers in the P2 phase would then continue to drive to the posted speed limit and will have to display the proposed green and white P-plate.

Rationale:

1. While RACT acknowledges that not all states have restrictions, RACT believes more needs to be taken into account in Tasmania.
 - This includes Tasmania's vehicle fleet being the oldest in Australia (12.9 years), which results in lower vehicle safety ratings and increased crash risk. As indicated above, young drivers tend to purchase these older and less safe vehicles.
 - Furthermore, the lower safety rating of Tasmania's roads also need to be considered, with approximately half our highways rated 3-Stars under the AusRAP Star Rating model.
 - Lastly, the minimum age to receive a P1 licence is 17 in Tasmania, compared to 18 in Victoria.
2. In addition, RACT is concerned that a complete removal of speed restrictions for novice drivers will result in increased risk, particularly for learner drivers travelling at posted limits while unfamiliar with traffic flow, following distances and observations.
 - Furthermore, and as mentioned, P1 drivers are also at high risk when driving alone after receiving their licences.
3. Nonetheless, RACT acknowledges that 80-90km/h speed restrictions are disruptive in 110km/h zones, hence why it has proposed to maintain a 100km/h speed limit in 110km/h areas for learner and P1 drivers.
4. These recommendations would also limit speed changes to learner drivers, removing the burden associated with multiple changes to the current model (such as blanket removal). This includes legislative amendments, public confusion and education and police enforcement.
 - A single learner phase and alternate P2 plates would assist in reducing public and police confusion of speed restrictions through greater distinction between each phase.
 - However, RACT also encourages the Department to consider education around speed restrictions to reduce the public's opposition to these rules and increase awareness and compliance.