



SOUTH AUSTRALIA'S
GRADUATED LICENSING SCHEME
INITIATIVES TO PROTECT
YOUNG DRIVERS

OUTCOMES FROM THE PUBLIC CONSULTATION

August 2012



Government of South Australia
Department of Planning,
Transport and Infrastructure

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BACKGROUND TO THE DISCUSSION PAPER

Almost 4,000 young people aged between 16 and 24 have been killed or seriously injured in road crashes in South Australia over the past decade. Many of those seriously injured sustain life-long head, neck or back injuries. In light of this, serious consideration must be given to ways we can reduce the road toll for young people.

The South Australia's Graduated Licensing Scheme — Initiatives to Protect Young Drivers Discussion Paper was released for public consultation on 14 October 2011. The Discussion Paper outlined five possible ways for reducing young driver trauma. These reflect world's best practice, are evidence-based and already in place in other parts of the country. The public consultation period lasted eight weeks, concluding on 9 December 2011. The five initiatives canvassed are possible enhancements to the State's Graduated Licensing Scheme (GLS), which aims to improve the safety of our young drivers:

1. A passenger restriction for P1 drivers allowing no more than one passenger under 21 for the duration of P1 (with exemptions for family members or for employment, or if a qualified supervising driver (QSD¹) is present).
2. A restriction on driving between midnight and 5am for P1 drivers for the duration of P1 (with exemptions for work-related driving or if a QSD is present).
3. Raising the minimum age for a provisional licence from 17 to 18 years.
4. Extending the total minimum provisional licence period from two to three years.
5. Removing regression to a previous licence stage.

The proposed initiatives are not about making life tougher for young drivers. They are about protecting them and would likely result in fewer deaths and injuries among young drivers, their passengers and other road users in South Australia.

The Discussion Paper was based on national and international research. It was prepared with input on young driver safety and effective GLSs interstate and overseas from the Centre for Automotive Safety Research (CASR) at The University of Adelaide. In particular, the Discussion Paper canvassed views on the minimum age for a provisional licence as such discussion was advocated by Adelaide Thinker in Residence, Professor Fred Wegman, from the Dutch Institute for Road Safety, during his public lectures in 2010.

¹ Qualified Supervising Driver (QSD) – a person who has held a full driver's licence for at least two years continuously without disqualification

A variety of communications were used to promote public participation in the Discussion Paper consultation process:

- > The Discussion Paper and a concise two-page Fact Sheet, together with a list of Frequently Asked Questions, were available by the website sa.gov.au/towardszerotogether, or by phoning the Department of Planning, Transport and Infrastructure (DPTI).
- > The Hon Tom Kenyon MP held a media call and issued a media release on 14 October 2011 to launch the Discussion Paper consultation period. Minister Kenyon, the current Road Safety Minister, Hon Jennifer Rankine MP, and Mr Martin Small, Director Road Safety and Environment (DPTI) were available to the media for interviews throughout the consultation period.
- > Print advertising was placed in major metropolitan, regional and youth oriented newspapers to raise general public awareness of the opportunity to provide comment.
- > Digital advertising was placed on selected websites including NineMSN, Adelaide Now and Rip it Up to promote the opportunity to provide comment online.
- > Advertising banners were placed on Government websites to further raise awareness of the availability of the Discussion Paper and encourage members of the public to 'have their say'.
- > Government social media sites including the DPTI Facebook, Towards Zero Together Facebook, My Licence Facebook, Office for Youth Facebook, Police News Facebook and SA Strategic Plan Have Your Say Facebook were used to further raise awareness of the availability of the Discussion Paper and opportunity to comment.
- > Letters were sent directly to key stakeholder organisations and groups, including Members of Parliament, Mayors, Community Road Safety Groups and those representing youth and road safety interests, to advise of the release of the Discussion Paper and opportunity to comment.
- > Key stakeholders were also invited to a forum on 14 November 2011 at DPTI to hear a presentation on the GLS initiatives by Mr Martin Small, Director Road Safety and Environment, DPTI, and to ask questions. Separate briefings with key stakeholders were also available upon request.

PUBLIC CONSULTATION PROCESS

The public consultation process was essentially an online feedback facility, allowing the public to enter and submit responses to the five GLS initiatives.

In total, 1079 responses including detailed submissions were received, predominantly through the online feedback form, but also via emails and formal hardcopy written submissions:

Submissions from Road Safety Stakeholders and other organisations (18)

- > Australian Medical Association (AMA) (SA) Road Safety Committee
- > AMA (SA) Inc.
- > Australian Driver Trainers Association (SA) Inc. (ADTA)
- > Australasian College of Road Safety (ACRS) – SA Chapter
- > Business SA
- > Centre for Accident Research and Road Safety – Queensland (CARRS-Q)
- > Centre for Automotive Safety Research (CASR)
- > Monash University Accident Research Centre (MUARC)
- > Motor Trade Association of SA Inc. (MTA)
- > Professional Driver Trainers Association (SA) Inc. (PDTA)
- > Royal Automobile Association of SA Inc. (RAA)
- > Royal Australasian College of Surgeons (RACS)
- > SA Ambulance Service (SAAS)
- > SA Farmers Federation (SAFF)
- > Service to Youth Council (SYC)
- > Transport Training Solutions incorporating Allan Miller Driving School (TTS)
- > University of New South Wales - Transport and Road Safety Research (UNSWTRSR) (previously NSW Injury Risk Management Research Centre)
- > Youth Affairs Council of South Australia (YACSA)

Local Government Submissions (15)

- > Adelaide Hills Council Youth Advisory Committee
- > Alexandrina Council – Southern Fleurieu Youth Network
- > City of Norwood Payneham and St Peters Youth Advisory Committee
- > City of Marion
- > City of Port Adelaide Enfield
- > City of Salisbury
- > District Council of Cleve
- > District Council of Grant
- > Kingston District Council
- > South East Local Government Association (SELGA)
- > Tatiara District Council – Elected Member
- > The District Council of Yorke Peninsula
- > The Rural City of Murray Bridge
- > Wattle Range Council
- > Wudinna District Council

Community Road Safety Groups (3)

- > Adelaide Hills Community Road Safety Group
- > Barunga West Community Road Safety Group
- > Roxby Roadsafe (Roxby Downs Community Road Safety Committee)

Members of Parliament (6)

- > The Hon John Hill MP (Minister for Health and Ageing)
- > The Hon Ian Hunter MLC (Minister for Youth)
- > Mr Steven Griffiths MP JP (Member for Goyder)
- > Mr Alan Sibbons MP (Member for Mitchell)
- > The Hon Dr Bob Such MP (Member for Fisher)
- > The Hon Russell Wortley MLC (Minister for Industrial Relations)

Written responses/submissions (50)

Includes Ministerial correspondence (26), hard copies of feedback forms received (21) and emails sent directly to DPTI's road safety mailbox (3).

Online responses/submissions (987)

In total, across the responses, 9541 comments were received and each was summarised under one of the GLS initiatives.

In addition, a number of submissions were received during January 2012. While they are included in the above listing, they were not sufficiently timely to be included in the response data analyses.

DEMOGRAPHIC PROFILE OF RESPONDENTS

While not compulsory, respondents were asked to provide some basic demographic data, collectively summarised as follows.

Location

Most respondents provided their postcode and the majority of these reside in the Adelaide metropolitan area, although, compared with the State's population², those residing in rural and regional locations had a proportionally higher representation among the submissions received. A very small number of submissions came from outside South Australia.

Postcode range	General Location	Response Percent	Response Count
5000-5199	Metropolitan Adelaide & surrounds	48.7%	526
5200-5299	South East (Mt Barker to Mt Gambier)	10.1%	109
5300-5399	Riverland, Mallee, Barossa	9.3%	100
5400-5499	Mid North	4.1%	44
5500-5599	Mid North & Yorke Peninsula	6.1%	66
5600-5699	Eyre Peninsula	5.6%	60
5700-5749	Far North	0.6%	7
Unspecified or outside of SA		15.5%	167
Total		100%	1079

Age

While the Discussion Paper attracted responses from a wide range of age groups, most responses (34.3%) came from those aged 41+ years followed by those aged 16-19 years (19.8%). Just over 50% of respondents were aged 26 or older.

Age	Response Percent	Response Count
15 or under	8.6%	93
16-19 years	19.8%	214
20-25 years	11.0%	119
26-40 years	16.0%	172
41+ years	34.3%	370
Unspecified	10.3%	111
Total	100%	1079

Gender

Most respondents (52.8%) were female.

Gender	Response Percent	Response Count
Male	35.5%	383
Female	52.8%	570
Unspecified	11.7%	126
Total	100%	1079

Licence Type

The majority of respondents (55.2%) possess a full driver's licence.

Licence type	Response Percent	Response Count
None	10.0%	108
Learner's Permit	10.9%	118
P1 Licence	11.3%	122
P2 Licence	2.6%	28
Full Licence	55.2%	596
Other	0.1%	1
Unspecified	9.9%	106
Total	100%	1079

Parentage

Almost one third (32.9%) of respondents indicated they are a parent.

Are you a parent/ carer/guardian of a novice driver?	Response Percent	Response Count
Yes	32.9%	355
No	51.2%	552
Unspecified	15.9%	172
Total	100%	1079

² Based on Australian Bureau of Statistics – Estimated Resident Population by Statistical Division, South Australia, Regional Population Growth, Australia, 2010 (cat. No. 3218.0)

DETAILED FEEDBACK OUTCOMES

1. Passenger restrictions

A restriction on carrying more than one passenger under the age of 21 would apply at all times for all P1 drivers for the duration of their P1 licence (the minimum time on a P1 licence is 12 months). The restriction would not apply where passengers are immediate family members or if a qualified supervising driver is present or the P1 driver is aged 25 or over.

Carrying passengers can distract a driver and make it harder for the driver to concentrate. Having more than one peer age passenger can also encourage a young driver to take greater risks. Research indicates young drivers' crash risk increases when carrying peer passengers and that the risk increases with each additional passenger. Carrying two to three peer passengers (under the age of 21 who are not family members) increases the risk of a young driver fatal crash by four to five times compared to driving alone. Passengers aged over 21 who have a full licence do not seem to have a negative effect on provisional drivers' behaviours.

Peer passenger restrictions exist in GLS programs in 42 US states, Canada and New Zealand. In these jurisdictions, where passenger restrictions are predominantly employed full time (i.e. day and night), reported reductions in young driver crashes have ranged from 5 to 38%. In Australia, Victoria, New South Wales and Queensland all have peer passenger restrictions in some form (with an exemption system) during the P1 licensing phase.

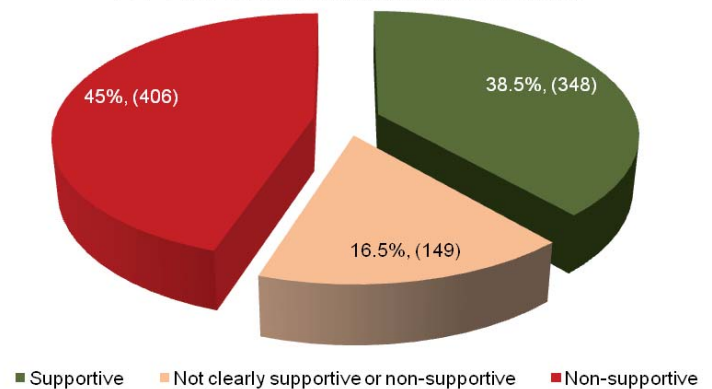
Passenger restrictions apply at all times of the day in Victoria while in the other states they apply at night from 11pm to 5am. Currently, South Australia only applies a passenger restriction at night from midnight to 5am for provisional drivers returning from a disqualification due to committing a serious disqualification offence. If South Australia were to extend its passenger restriction to cover all drivers during the P1 licensing phase, this would bring greater road safety benefits and interstate consistency.

If peer passenger restrictions were introduced in South Australia as proposed, CASR estimates a 10 to 14% reduction in serious and fatal crashes involving young drivers aged 16-17. This equates to a reduction of 7 to 10 fatal and serious injury crashes per year, or 12 to 17 fatal and serious injuries per year.

There were 903 respondents who collectively made 2147 comments about passenger restrictions. Figure 1 shows that 38.5% of the 903 respondents were deemed to be supportive of passenger restrictions, 45% were deemed to be non-supportive and in 16.5% of cases it was not clear if the respondent favoured one way or another.

Figure 1

A passenger restriction allowing no more than one passenger aged under 21 for all P1 drivers for the duration of P1 etc. (903 respondents, multiple responses)



Respondents making supportive comments on passenger restrictions tended to simply say they supported the initiative or stated it is "a good idea", with little if any further comment. Supportive comments included:

- > "Should have been introduced long ago"
- > "Seems reasonable/feasible"
- > "A significant development"
- > "Reduces peer pressure/showing off"
- > "Restricting passengers will mean fewer distractions for drivers"
- > "Research shows the restrictions reduce crashes"
- > "Helps parents enforce rules already in place"
- > "Reduces injuries and deaths of others".

Those making non-supportive comments tended to make multiple comments of a non-supporting nature. One frequently expressed concern is the perceived impact passenger restrictions could have on car-pooling and designated driver programs where one person in a group of friends agrees to not drink alcohol. Another common concern is the possible effect on regional people who rely on others when travelling to work, school, sport or other social functions.

Other non-supportive responses included:

- > “The State cannot protect all people from themselves or the poor choices they make, they will continue to break rules and laws”
- > “Not environmentally sound/ethical”
- > “Unrealistic/unfair/impractical”
- > “Difficult to police/enforce”
- > “Restricts/reduces the independence of young people”
- > “May cause risky/illegal behaviours/dangerous situations as a side effect”
- > “Penalises safe drivers”.

Many respondents made comments that were relevant to passenger restrictions, but in which it was not clear whether the respondent supported the restrictions or not. Many of these responses contained questions relating to specific situations, such as about qualifying for exemptions from the restrictions. Other such responses (including those not specifically relevant to passenger restrictions) were:

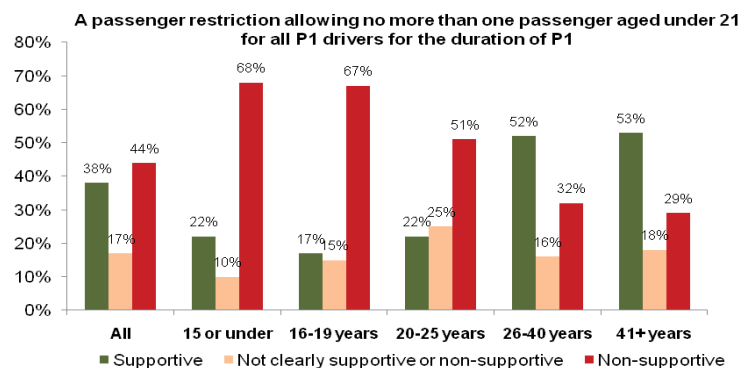
- > “Might leave people stranded if unable to give friends a lift”
- > “Public transport is insufficient or requires improvement”
- > “Allow a limited number (e.g. 2-3) of passengers”
- > “More education is preferable”
- > “More trust in younger drivers is needed”
- > “Restrict passenger numbers at night only”
- > “Distractions are inevitable”
- > “Novice drivers need experience driving with distractions”
- > “Focus should be on enforcing current laws”
- > “Sometimes family members can be distracting too – should there be exemptions for family members?”
- > “A licence is too easy to obtain in the first place”
- > “Could be imposed on offenders only”
- > “May encourage riskier methods of carrying passengers (e.g. hidden in boot or back of car)”
- > “Should apply to Learners also”
- > “No evidence that it will reduce road toll”
- > “More focus needed on drink driving”.

Respondents from rural areas tended to be less supportive of this initiative than their metropolitan counterparts, usually due to perceived negative effects on young people, families and communities as mentioned above. Among respondents from rural areas, 34% indicated support, 50% made non-supportive comments and 16% made comments that were neither one way nor the other. Metropolitan Adelaide respondents had similar proportions of supporting comments (42%) as non-supporting (41%).

The results based on gender were mixed. Slightly more females (39%) than males (36%) indicated support for passenger restrictions. However, slightly more males (46%) than females (43%) made non-supportive comments. Females were more likely to express concerns relating to the availability of public transport, the effect on designated driving and on regional/rural communities and the impact upon families.

As might be expected, younger respondents’ comments were more likely to be non-supportive of passenger restrictions than those who are older (Figure 2). Non-supportive comments were made by 68% of those aged 15 or under, 67% of those aged 16-19 and 51% of those aged 20-25. By contrast, 52% of those aged 26-40 and 53% of those aged 41+ made supportive comments.

Figure 2



Particular concerns stated by 16-19 year olds included the perceived effect on car-pooling and designated driver activities, young people’s independence, imposition on families and inconvenience.

Older respondents were more than twice as likely as younger respondents to make supportive comments. In particular, older respondents tend to believe it would reduce peer pressure and distractions. Of respondents aged 26-40 and 41+, 52% and 53% respectively made supportive comments. Of respondents aged 15 and under and those aged 16-19, 22% and 17% respectively made supportive comments.

Respondents with full driver’s licences tended to show greater support for passenger restrictions (49% of full licence holders compared to 25% with a learner’s permit, 10% of those with provisional P1 and 30% of those with P2).

There were marked differences between responses from those who are parents/guardians/carers of novice drivers and those who are not. Parents were more likely to be supportive of passenger restrictions. Among parent respondents, 47% made supportive comments whereas 33% who were not parents made supportive comments. Conversely, fewer parents (35%) than non-parents (50%) made non-supportive comments.

Passenger restriction exemptions

There were wide ranging views in relation to passenger restriction exemptions. There were respondents who considered passenger restrictions should be implemented without any exemptions at all, even extending the restrictions to all novice drivers, regardless of age or any exemption considerations. Their comments included:

- > "I do not agree with exceptions [sic]"
- > "What about when siblings cruise together?"
- > "Too difficult to police; it would have to be a blanket ban, with no exemptions"
- > "A waste of Police resources".

There were also generally supportive opinions proposing specific exemption circumstances (e.g. employment, study, designated driving, voluntary work). There were also comments that gave the impression the respondent had not completely understood the proposed initiative and/or the exemptions under consideration.

Finally, there were respondents who, rather than necessarily indicating whether they support exemptions or not, considered that greater definition and explanation was needed, particularly in relation to specific circumstances:

- > "Further definition of "family member" needed (i.e. grandparents, aunts etc.)"
- > "Specify the age of the passengers (e.g. restrict youth and young adult passengers but allow multiple small children or seniors")
- > "There should be some flexibility required for when there is a legitimate reason as to why more passengers need to be carried"
- > "Difficult for young parents"
- > "It is difficult to understand why siblings are immediately deemed to be less distracting than non-relatives"
- > "In the event of an unforeseen injury/illness and the P driver is the only person available to transport people"
- > "In the event of an unforeseen excess of alcohol consumption and the P driver is the only sober person"

- > "It is punitive towards those with safe driving records and good intentions (i.e. these people should be completely exempted)"
- > "It is a parent's responsibility to impose both restrictions and exemptions".

Other comments included:

- > "People should be allowed a few more "passengers""
- > "Two passengers more reasonable"
- > "Maybe only those under 18 or, maybe 18 or 19 years of age, 21 years too old"
- > "Only after 10pm"
- > "Only for the first 6 months of attaining P1"
- > "Remove presence of a QSD as an exemption"
- > "Ensure that the process of applying for exemptions is simple, fast and does not place a strain on Government resources"
- > "Increase restriction to both P1 and P2"
- > "Enable on-the-spot exemptions for P1 drivers rescuing others in vulnerable situations"
- > "Exempt those picking up and dropping off friends' family members from/to school"
- > "Exempt those without access to public transport"
- > "Exempt long distance travel"
- > "Exempt carpooling/designated drivers"
- > "Exempt study/education commitments"
- > "Exempt newly-arrived Australians"
- > "Introduce the restriction but make an exemption for school hours so as senior students can have younger passengers".

2. Night driving restrictions

A restriction on driving between the hours of midnight and 5am would apply for all P1 drivers for the duration of their P1 licence (i.e. a minimum of one year). The restriction would not apply if a qualified supervising driver is present or if the P1 driver is aged 25 or over.

A driver would be able to apply for an exemption from the restriction for employment purposes, however a person's driving history may be considered and any exemption granted would be made specific to those circumstances. A driver would still need to adhere to the restriction in their remaining night driving.

All drivers have an increased risk of crashing when driving late at night but the risk is greater for inexperienced drivers. In South Australia, young provisional drivers experience late night crash rates that are up to seven times their daytime rates. This is not just because it is harder to see hazards at night but also because young drivers tend to spend more time driving at night compared to other drivers.

Currently, 48 states in the USA have night time restrictions for young drivers. Such restrictions are also applied in New Zealand, Canada and Western Australia. Research from overseas jurisdictions that have night driving restrictions report reductions in young driver crashes of up to 50% during the restricted night hours. GLS systems with strict night restrictions have been found to be some of the most effective programs.

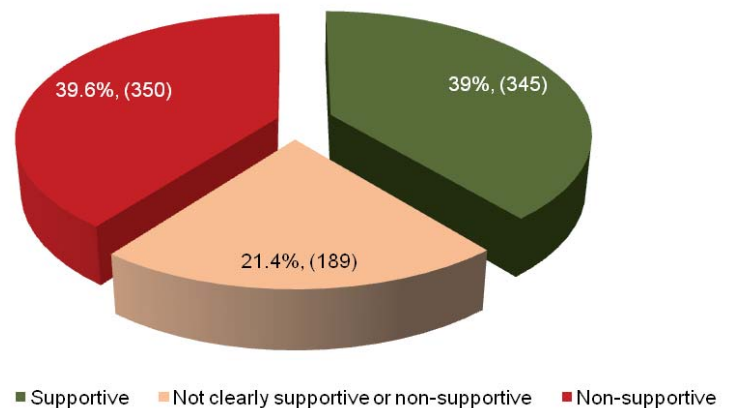
As with passenger restrictions, restricting provisional drivers from late night driving could reduce their mobility and cause some inconvenience, particularly for those living in rural areas. However, experience from the US suggests young drivers with night restrictions adapt by arranging lifts or arriving at destinations earlier. Most jurisdictions with night restrictions typically allow exemptions for 'purposeful' driving such as for work, education and/or emergencies.

If night-time driving restrictions were introduced into South Australia as proposed, CASR estimates a 9 to 13% reduction in serious and fatal crashes involving young drivers aged 16-17 years. This equates to a reduction of 6 to 8 fatal and serious injury crashes per year or 8 to 12 fatal and serious injuries per year.

In total, 884 respondents collectively made 1957 comments about night driving restrictions. Figure 3 shows that 39% of respondents were deemed to be supportive of night driving restrictions, 39.6% were deemed to be non-supportive, and in 21.4% of cases it was not clear if the respondent favoured one way or another.

Figure 3

A restriction on driving between midnight and 5am for all P1 drivers for the duration of P1 etc.
(884 respondents, multiple responses)



As with passenger restrictions, respondents making supportive comments on night driving restrictions tended to simply say they supported the initiative or stated it is "a good idea", with little if any further comment. Other supportive comments included:

- > "Research supports it"
- > "May prevent driver fatigue"
- > "May prevent drink driving"
- > "Would reduce/eliminate unsafe driving or hooning at night"
- > "Reduces temptation to race"
- > "Reduces peer pressure/showing off"
- > "A significant development".

Those making non-supportive comments tended to make multiple comments of a non-supporting nature. Common concerns related to effects on car pooling, designated driver programs and how the exemption system would operate.

Other non-supportive responses were:

- > “May create other risky behaviours or dangerous situations as a side-effect”
- > “Could have a negative effect on rural youth/families/communities”
- > “Restricts youth development (e.g. sports, socialisation)”
- > “Restricts youth employment/education opportunities”
- > “Reduces the independence of young people”
- > “Impractical”
- > “Difficult to police/enforce”
- > “Doesn’t address actual issue at hand/will not solve problem”
- > “Increased imposition/impact upon parents/families”
- > “Punishes the majority for the mistakes of a few”
- > “Disallows getting experience in night driving”
- > “The State cannot protect all people from themselves or the poor choices they make, they will continue to break rules and laws”
- > “Cannot pick up parents/family at night”
- > “Research does not show a positive impact”
- > “Too radical”.

Responses that were not clear whether they were supportive or non-supportive included:

- > “Needs more provisos (e.g. emergencies/long distance trips etc)”
- > “Public transport requires improvement/is insufficient”
- > “Proposed 12-5am hours are too restrictive (e.g. midnight is too early make it later; 5am is too late/make it earlier)”
- > “Increased education is preferable”
- > “Age criteria need more consideration”
- > “Process of obtaining exemptions must be simple”
- > “Could be imposed on offenders only”
- > “More trust is needed in younger drivers”
- > “Individual choice should prevail “
- > “Current laws are adequate”
- > “Crashes are inevitable, regardless of rules”
- > “Won’t apply to me/other people since not out and about between 12pm-5am”
- > “Passenger restrictions are better than this”
- > “Should introduce capped speed limit instead”
- > “Unnecessary, if passenger restrictions are implemented”.

Generally, there were small differences in the views on night driving restrictions between those who live in the Adelaide metropolitan area and those residing in the rest of the State. Approximately 37% of the rural submissions and 42% of the metropolitan-based respondents were deemed to be making

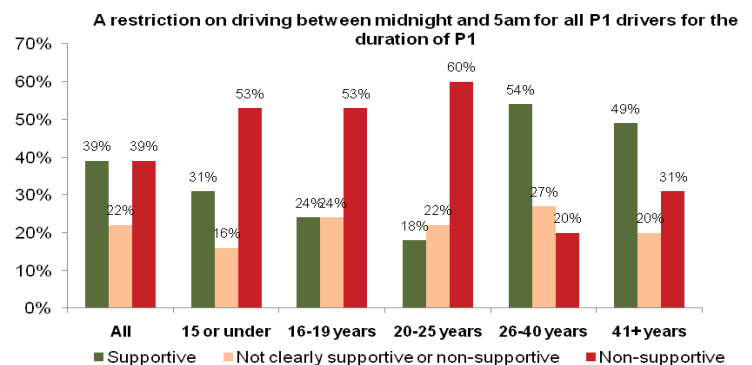
supportive comments. Those living in rural areas tended to make more comments about possible adverse effects on rural people as well as queries relating to exemptions and concerns around youth employment.

There were also small differences in relation to respondent gender. Approximately 41% of female and 35% of male respondents made supportive comments.

As with passenger restrictions, younger respondents and particularly those aged 20-25 years tended to be non-supportive of night driving restrictions and older respondents tended to be supportive (Figure 4).

Younger respondents tended to consider that midnight is too early to begin the restriction and tended to not perceive any benefits from such a restriction. They also tended to comment on effects on car-pooling and designated driver programs, and that it would be unfair and restrictive on their development, independence and employment.

Figure 4



Respondents with full licences (49%) tended to be more supportive of this initiative than those with other types of licences (27% learner’s permit, 16% provisional P1 licence, 23% P2 licence).

Respondents who are parents/carers of novice drivers (46%) tended to be more supportive of night driving restrictions than those who are not parents (35%).

Night driving restrictions exemptions

While there were fewer comments concerning exemptions for a night driving restriction (than were received for passenger restrictions), there were still wide ranging opinions. Some respondents considered exemptions should be more numerous and simple-to-obtain, while others considered they should be more restrictive or not awarded at all.

Some respondents who were deemed non-supportive of night driving restrictions still provided suggestions such as:

- > “This is again an inappropriate solution. At the very most, this should be between 2am-5am”
- > “Disagree. 1am – 5am would at least be a little more flexible”
- > “Maybe just six months, instead of all of P1?”
- > “This may work better if implemented on Friday, Saturday and Sunday nights”.

Many comments from other respondents suggested specific grounds for exemptions:

- > “Drivers aged over 21 or, aged over 24 or 25”
- > “Drivers who are carers for people who may require access to late night medical assistance (or who find themselves in a situation requiring emergency transport)”
- > “Designated drivers, being sober people transporting people to and from social events”
- > “Drivers with unblemished driving record”
- > “Rural/regional area drivers, or those living in areas where late night public transport does not exist”
- > “Weekday travel, with the curfew active at weekends”.

3. Raising the minimum driving age

The minimum age a person could apply for a provisional licence in South Australia would be increased from 17 to 18 years of age, meaning drivers cannot drive solo until they are at least 18 years of age. This initiative would not change the minimum entry age of 16 years for a learner’s permit.

Research indicates that increasing the licensing age reduces young driver crashes and improves road safety for young drivers. Delaying the age for provisional licensing provides a new driver with greater time to gain experience while being supervised by a more experienced driver. A learner driver would then be better prepared when they eventually gain a provisional licence.

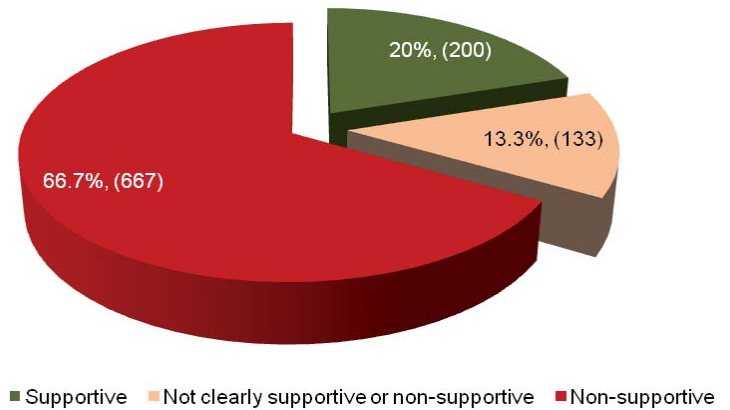
Raising the licensing age can be expected to reduce this risk on a provisional licence substantially because learner drivers are likely to gain many more supervised hours in a two year period than the current requirement for 75 hours. The European Union’s driver licensing guidelines recommend that licensing for unsupervised driving should commence at 18 years. This is based on research from European countries showing the risk of crash involvement during the first year of independent driving (i.e. on a provisional licence) decreases as the age when a driver begins independent driving increases. Victoria has had a provisional licensing age of 18 for many decades.

If South Australia raised the minimum provisional licensing age to 18 as proposed, CASR estimates a 5 to 6% reduction in **all** serious and fatal crashes in South Australia (i.e. a 5 to 6% reduction in the South Australian road toll), as crashes involving young drivers aged 16-17 years would be largely eliminated. This initiative would bring the greatest crash reductions for South Australia and equates to a reduction of 60 to 70 fatal and serious injury crashes per year. This is equivalent to a 20% reduction in serious and fatal crashes for drivers aged 16 to 24 years. While new P1 drivers aged 18 would have a higher crash rate in their first year compared with afterwards, their first year crash rate would not be expected to be as high as that for 16 or 17 year olds on their first year on a provisional licence.

In total, 1000 respondents collectively made 3043 comments about raising the minimum driving age. Figure 5 shows that 20% of respondents were deemed to be supportive of raising the minimum age, 66.7% were deemed to be non-supportive, and in 13.3% of cases it was not clear if the respondent favoured one way or another.

Figure 5

Raise the minimum age for a provisional licence from 17 to 18 years etc.
(1000 respondents, multiple responses)



Respondents making supportive comments on raising the minimum provisional licence age tended to simply say they supported the initiative or stated it is “a good idea”, with little if any further comment. Other supportive comments included:

- > “Research supports it”
- > “Good/reasonable idea”
- > “An absolute must/should definitely implement”
- > “Greater level of maturity at 18 (or older)”
- > “Age 17 and younger is too young/immature/irresponsible”
- > “OK, but review current demerit point system”.

Those making non-supportive comments tended to make multiple comments of a non-supportive nature and in many instances were iterations of comments made about passenger and night time driving restrictions, including:

- > “Difficult/impossible for young workers/job seekers/volunteers”
- > “Poor/harsh/negative effect on regional/rural youth/families/communities”
- > “Restricts youth development (e.g. sport, socialisation, education)”
- > “Restricts the independence of young people”

- > “Doesn’t address actual issue at hand/will not solve problem”
- > “Will make no difference”
- > “Delays crash statistics to higher age bracket”
- > “Punishes the majority for the mistakes of a few”
- > “Reduces opportunities to gain experience”
- > “The State cannot protect people from making poor choices; they will continue to break rules and laws”
- > “Will negatively impact on driving instructors”
- > “Public transport requires improvement/increased access/is insufficient”
- > “Revert to 16 years”
- > “May induce overconfidence”
- > “Unintended problems might occur as 18 years is same age as legal alcohol consumption”
- > “May have negative effect on SA’s regional/community economic growth/performance”.

Responses that were not clear whether they were supportive or non-supportive included:

- > “Focus should be upon driver training/attitudes to driving”
- > “Needs more consideration/requires further information” (e.g. exemptions, research etc.)
- > “Enforce current laws”
- > “Introduce/provide driver education in schools”
- > “Make it harder for people to gain their licences/tougher tests/keep “idiots” from gaining licences”
- > “Some young drivers are more able to drive at younger age than others”
- > “More trust needed/have more faith in younger drivers”
- > “OK, if exemptions exist”
- > “Should be older licence age (e.g. 21 years)”
- > “Keep Learner’s at 16 years”
- > “Could be imposed as a punishment for offenders only”
- > “16/17 was OK for me/my generation of drivers”
- > “Limit speeds/types of cars instead”
- > “Difficult to police/enforce.”

Those living in rural areas of the State were generally far less supportive of this initiative than those living in metropolitan areas. Of the rural respondents, 80% made non-supportive comments compared to 56% of metropolitan respondents. Conversely, among rural respondents, 8% made supportive comments compared to 28% in metropolitan areas.

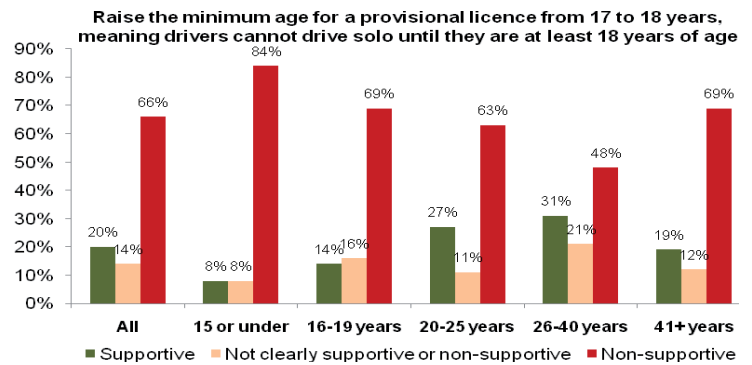
The majority of rural concerns centred on increased costs of transport, difficulties of gaining/retaining youth employment, increased imposition upon parents and families, generally

negative effects upon regional/rural people and restrictions on the independence and development of young people.

Responses by gender were mixed, although females were more supportive of this initiative than males (21% and 18% respectively).

Based on age groups, as with other initiatives, support for raising the minimum age tended to increase with increasing age, with the exception of those aged 41+ years (Figure 6). However, across the age groups the proportion of those making non-supportive comments varied between 48% for those aged 26-40, to 84% for those aged 15 or under.

Figure 6



Respondents with a provisional P1 licence and a full driver’s licence tended to be more supportive of this initiative (23% and 22% respectively) than those with other types of licences (15% learner’s permit and 8% P2 licence) or no licence at all (14%).

Those who are not parents, carers or guardians of novice drivers tended to show greater support of this initiative than those who are parents (23% of non-parents are in support compared to 16% of parents).

Those who are not parents tended to say that 18 year olds possess a greater level of maturity to drive than at age 17. Many parents queried this proposal and often felt it would be better to enforce the current laws and improve driver training. Their queries and concerns centred on increased costs of transport, difficulties associated with youth employment, inability to access public transport, negative effects on rural people and youth development. Parents also tended to say this initiative would punish the majority for the mistakes of the few compared with non-parents as well as being an increased imposition on parents and families.

4. Extending the minimum provisional licence period

All novice drivers under 25 years of age would be required to spend a minimum of three years on a provisional licence. This means they would be at a minimum age of 20 upon becoming eligible to apply for a full licence. It should be noted this initiative does not take into account the minimum age for a full licence holder if other initiatives proposed in this paper are also introduced.

In South Australia, the current total minimum period required on a provisional licence is at least two years. At least one year must be spent on P1 and at least six months on P2. In practice, for many young drivers, the total time on a provisional licence is greater than two years.

Extending the provisional licence period would extend the protective conditions such as a zero blood alcohol limit, speed restrictions, mobile phone restrictions, high powered car restrictions and a lower demerit point allowance (4 or more demerit points results in a licence disqualification) that help keep young drivers out of high risk situations. A longer provisional period would allow more time for a provisional driver to safely make the adjustment from supervised driving in the learner’s permit phase to unsupervised driving upon graduating to a full licence.

Importantly, allowing young drivers a longer period to gain unsupervised driving experience, while under some restrictions, is likely to result in greater young driver competence and fewer crashes.

Research from Victoria suggests a longer period on a provisional licence can be more effective in reducing alcohol-related crashes by deterring provisional drivers from drinking prior to driving and by encouraging the establishment of safe behaviours that separate drinking from driving at least while the holder of a provisional licence.

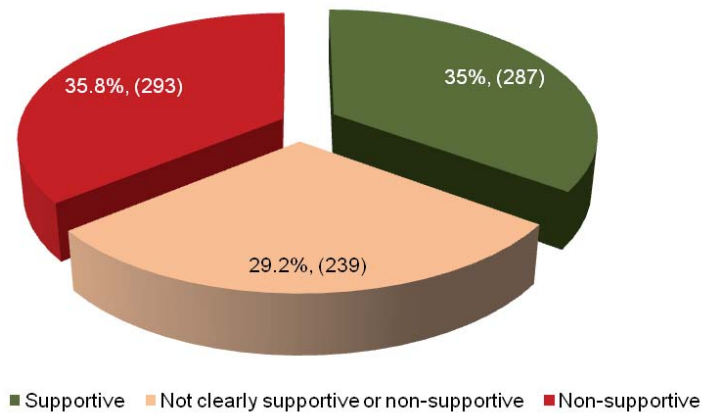
This initiative would not alter the requirement for a minimum of one year on a P1 licence so many young drivers would not have to display P plates during the additional year if they hold a P2 licence.

Extending the provisional licence period to three years would bring South Australia in line with NSW, Queensland, Tasmania and the ACT. Victoria has a minimum provisional licence period of four years.

In total, 819 respondents collectively made 1515 comments about extending the minimum provisional licence period. Figure 7 shows that 35% of respondents were deemed to be supportive of extending the minimum provisional period, 35.8% were deemed to be non-supportive, and in 29.2% of cases it was not clear if the respondent favoured one way or another.

Figure 7

Extend the total minimum provisional licence period from 2 to 3 years etc.
(819 respondents, multiple responses)



While supportive and non-supportive respondents were similar in proportion, for almost a third of all respondents it was not clear whether or not they supported one or the other.

Supportive comments included:

- > “Will increase young drivers’ experience on the road”
- > “A worthwhile improvement”
- > “Encourages P-platers to drive more cautiously”
- > “Is consistent with other states”
- > “Would mean a longer period on zero BAC levels” (blood alcohol concentration)
- > “The research supports it”
- > “Better than other initiatives”
- > “OK, if exemptions exist”.

Many non-supportive respondents made multiple comments many of which repeated responses to other initiatives:

- > “Will not solve problem”
- > “An extra year is too long”
- > “Nanny state proposal”
- > “Harsh/negative effect on rural youth/families/communities”

- > “Would be difficult for young workers/job seekers/volunteers”
- > “Not necessary if the provisional licence age is raised to 18”
- > “Restricts the independence of young people”
- > “An annoyance/inconvenient”
- > “Expensive”
- > “Time (itself) won’t improve quality of drivers”
- > “Punishes good drivers”
- > “Will induce overconfidence in drivers”
- > “The state cannot protect people from the poor choices they make”
- > “Punishes the majority for the mistakes of a few”
- > “May create/cause more risky/illegal behaviours/dangerous situations as a side effect”
- > “Difficult to police”
- > “Apply this rule to all or none”
- > “Unnecessary, does not make us any more skilled by increasing years”
- > “Disagree. Another ridiculous idea. At some stage Provisional drivers need to learn responsibility. This should be taught through the existing 2 year period”.

There were respondents who considered that the proposed exemption for drivers aged over 25 years should be removed, for example:

- > “A 25+ newly-minted P-plater is just as inexperienced as the 17 year old P-plater”.

Responses that were not clear whether they were supportive or non-supportive included:

- > “OK, but review current demerit points system”
- > “Two years is adequate”
- > “Should encourage/provide driver training as well/instead”
- > “Should be nationwide”
- > “Introduce restrictions for engine power”
- > “Legal to do other responsible activities aged 18 (e.g. leave home, work, be a parent, armed forces etc.)”
- > “Revenue raising proposal”
- > “Impose this OR other initiatives - not all together/drop others if this is effected”
- > “Should depend on age of driver”
- > “Give current/recent licensing legislation a chance to perform/be evaluated”
- > “Scrap the P-plate system”
- > “More trust is needed in younger drivers”
- > “Could be applied to offenders only”
- > “Make Learner and P-plate tests more onerous or introduce more tests”

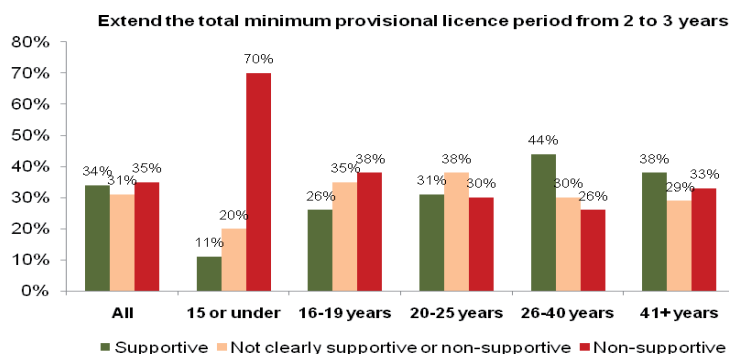
- > “Make it 5 years and make it 2 years of holding a Learner’s before being eligible to apply for a P licence so, in effect, it will be 7 years in all, before a driver is able to be unsupervised on our roads”.

Slightly more respondents living in the metropolitan area (36%) were supportive of this initiative than those living in regional or rural areas (29%). Rural respondents (40%) were more likely than metropolitan respondents (32%) to make non-supportive comments. Rural respondents were predominantly concerned about the effects a three year provisional period may have on rural people.

There were very few differences between the opinions of males and females, although slightly more female respondents (34%) were supportive of the initiative than males (31%). Males tended to believe an extra year would not resolve road safety issues and were more supportive of driver training and testing initiatives.

The numbers of respondents who were supportive of an extra year tended to increase with age (see Figure 8), with the highest level of support among those aged 26-40 (44%). The highest level of non-support came from those who were aged 15 or under. Interestingly, among 16-19 year olds, a younger age group likely to currently drive, the level of non-support (38%) for an extra year was not substantially higher than that for the older age groups.

Figure 8



As with other initiatives, those with full licences tended to be more supportive of this initiative than those with other types of licences or no licence.

Generally, there were few differences in the feedback on this initiative between those who are parents/guardians/carers of novice drivers and those who are not. Many parental comments tended to favour improving driver training instead.

5. Removing regression penalties

Novice drivers who become disqualified would no longer be required to regress to their previous licence stage or pass any tests associated with that previous stage. However, they would still be subject to the current requirements that extend the total time disqualified drivers must serve on a learner's permit or provisional licence.

Currently learner's permit and provisional licence holders who receive a disqualification are required, after serving the disqualification, to regress to their previous licence stage and re-pass any associated tests.

Research supports the notion that extra time driving under GLS conditions brings overall safety benefits to novice drivers, particularly in the learner stage. However, the additional requirements to re-pass a test that has already been passed or to revert to a previous licence stage without undertaking further training at that stage have faced criticism from novice drivers, their parents and the broader community. There is also no evidence to suggest these re-testing requirements lead to novice drivers becoming any safer on the road.

The latest suite of GLS changes, introduced on 4 September 2010, included a provision for disqualified provisional drivers to be offered a Safer Driver Agreement which allows such drivers to continue driving under strict conditions in lieu of serving the disqualification. South Australia's Safer Driver Agreement follows similar initiatives interstate and is not available where disqualifications arise from a serious disqualification offence. Already it has proved a popular take up option. It offers a rehabilitative opportunity to novice drivers disqualified through lower level offences by still allowing them to drive but without incurring the hardship of a disqualification or the consequences of regression. However, if drivers breach the agreement they are disqualified for twice the period they would originally have had to serve and the regression provisions apply at the end of the disqualification period.

The regression provision is not a common one in Australia. Apart from South Australia, Tasmania is the only other jurisdiction to apply regression to disqualified drivers in certain circumstances.

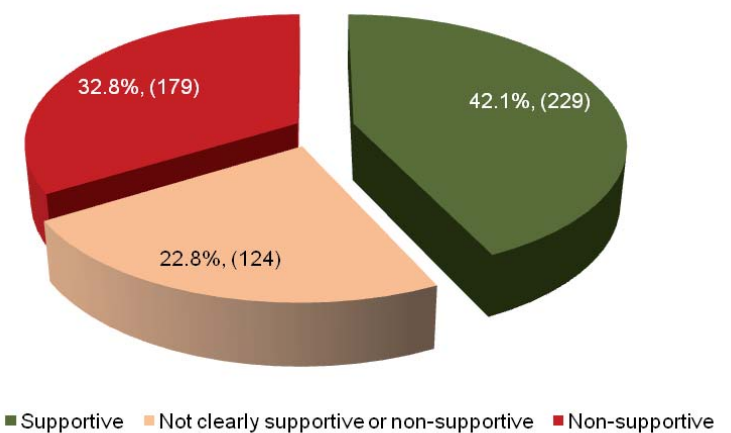
Removing the requirement for disqualified novice drivers to regress to a previous licence stage and pass any tests associated with that stage would assist in reducing confusion amongst novice drivers and their parents, simplify the pathways involved in the GLS, have positive financial outcomes for disqualified novice drivers and bring South Australia into line with most other Australian jurisdictions.

In total, 532 respondents collectively made 879 comments about removing regression penalties. Figure 9 shows that 42.1% of respondents were deemed to be supportive of

removing regression penalties, 32.8% were deemed to be non-supportive and in 22.8% of cases it was not clear if the respondent favoured one way or another.

Figure 9

**Remove regression to a previous licence stage
(532 respondents, multiple responses)**



Supportive comments included:

- > "Conditional acceptance of initiative"
- > "Is more consistent with other states' systems"
- > "Will have minimal effect on employment opportunities"
- > "OK, if other initiative(s) is/are introduced"
- > "Current legislation is ineffective"
- > "Encourages a focus on education rather than punishment"
- > "Current legislation too costly"
- > "Research supports it"
- > "It is unfair/of no use to make drivers re-take tests".

Many respondents who did not support removal of regression said they consider disqualified drivers deserve harsher penalties. Other non-supportive comments included:

- > "Current laws should remain"
- > "Is not sufficiently severe to deter poor driving"
- > "Counterproductive"

- > “The State cannot protect people from themselves”
- > “Increase regression measures and increase fines”
- > “We need punitive measures as a deterrent”.

Responses that were not clear whether they were supportive or non-supportive included:

- > “OK, if exemptions exist”
- > “If applied only for minor offences”
- > “Instead, remove their licence altogether”
- > “Focus on reward, not punishment”
- > “Introduce additional driver training”
- > “Depends on severity of offence”
- > “Regression may be useful at times”.

Some respondents thought regression could be retained to provide some form of punitive measure or deterrent, for example:

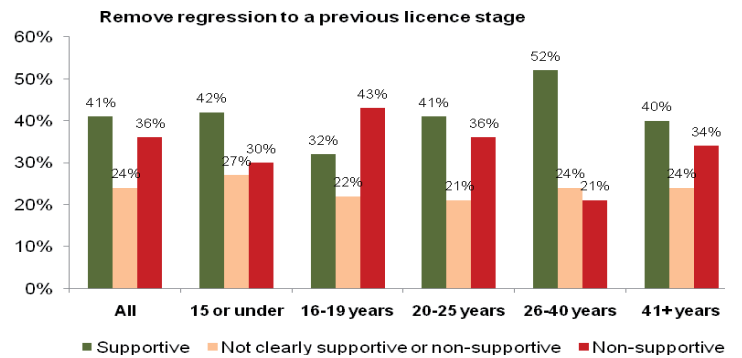
- > “Young people generally value their licenses greatly and stage-regression is a strong threat. In my opinion un-policed ‘Agreements’ would not carry the same weight as stage-regression”
- > “People should be punished for violating road rules, but only those disqualified, not the people who drive well”
- > “This is the only big stick that the government has”.

There were equal proportions of support between the metropolitan and rural respondents (41%). However rural respondents tended to consider the current legislation is too harsh and metropolitan respondents consider it is too costly.

There were similar proportions of support between female (41%) and male (41%) respondents. The male respondents tended to consider regression is too harsh and ineffective whereas females tended to consider regression may be useful.

Levels of support for this initiative ranged from 32% for those aged 16-19 and up to 52% for those aged 26-40 (Figure 10). Interestingly, 16-19 year olds showed the highest level of non-support (43%) and tended to consider regression as a useful deterrent to poor driving.

Figure 10



Respondents with learner’s permits (35%) and P1 licences (36%) tended to be less supportive of removing regression than those with P2 licences (50%) and full licences (42%). Learner’s permit and P1 respondents tended to consider that the existing regression provisions should remain.

There were very few differences in the opinions between those who are parents or guardians/carers of novice drivers and those who are not. Non-parents tended to consider that the current legislation is too harsh and costly but also that regression could be useful at times.

DETAILED FEEDBACK OUTCOMES -

STAKEHOLDERS

The format and length of comments from stakeholders, including Members of Parliament and Local Government varied considerably; from a simple letter collectively addressing all the GLS initiatives, through to comparatively lengthy literature and research reviews, including on individual initiatives. Each of the stakeholder submissions received is summarised below.

Road Safety Stakeholders and other organisations

AMA (SA) Road Safety Committee wrote, “By firstly acknowledging that the development of legislation in the area of road safety is based upon evidence on the topic of brain maturation (of the young), this organisation supports the proposed GLS initiatives”:

“We welcome the approach of acknowledging this evidence which impacts directly upon the ability of the young to assess, manage and avoid risk. The subsequent drafting of legislation supporting graded licensing, thereby enabling experience to be gained over time commensurate with risk situations (e.g. night driving, limited passengers etc.) is both sensible and defensible upon the medical evidence.”

Australian Medical Association (South Australia) Inc. This submission, emanating from another area of the AMA (SA), also provides unqualified support for all five of the proposed initiatives, noting in particular that extending the provisional licence period to 3 years [along with raising the licence age to 18] will ensure that drivers must have a zero blood alcohol level until they reach age 21.

Australian Driver Trainers Association (SA) Inc. The ADTA (SA)’s submission indicated that the organisation “advocates a Safe System Approach, which strives to achieve safer drivers in safer cars on safer roads” and then made the following comments:

Passenger restrictions: Supports, with appropriate exemptions (i.e. immediate family members, employment, Qualified Supervising Driver present, hardship & family circumstances, issues associated with country regions).

Night driving restrictions: Supports, with appropriate exemptions (i.e. issues associated with country regions).

Raising the minimum driving age: Does not support this initiative, saying that “it is very difficult if not impossible to compare how learners gain driving experience in other

jurisdictions when compared to South Australia.” ADTA is highly supportive of the Competency Based Training & Assessment scheme but would nevertheless support a review of that scheme.

Extension of the minimum provisional licence period: Supports.

Removal of regression penalties: Supports.

Australasian College of Road Safety – SA Chapter The College wrote that it supports the proposed changes on the strong evidence base. It is particularly supportive of raising the licence age to 18 and congratulates the Government for trying to advance the young driver safety issue. The College also recommends the monitoring of the impacts of the proposed changes (pre- and post-implementation). In addition,

“The adoption of the proposed measures would result in significant cultural change for young drivers and their families but will result in reduced death and injury and would bring South Australia further in line with international best practice in GLS.”

Business SA While stating that it generally supports initiatives to improve road safety for all drivers, Business SA’s submission expressed concerns relating to:

Raising the minimum driving age: Supported, providing the restrictions do not prevent young people from being employed or negatively impact upon business operations. Business SA supports an exemption system, including for travel to and from work and while undertaking work-related tasks. It is recommended that young, exempted drivers have their status clearly identified on the licences so as to avoid problems if pulled over by the police.

Related recommendations were:

- > consideration should be given to providing driver training through schools
- > young drivers should be taught defensive driving skills (practical) to equip them to handle difficult situations.

Centre for Accident Research & Road Safety – Queensland (CARRS-Q) This submission provided a great deal of information on existing research and experiences relating to the proposed initiatives, including an extensive list of references, justifying CARRS-Q’s overall position of support:

“It would appear that four of the five initiatives suggested in South Australia’s Graduated Licensing Scheme Discussion Paper of October 2011 are grounded in best practice for GDL programs operating not only in Australia but also in other jurisdictions around the world. As such, CARRS-Q supports these changes.”

In addition, CARRS-Q posed the following points for further consideration:

- > Recommended before and after implementation evaluations are conducted for each initiative, if and when any is adopted.
- > Alternative options for passenger restrictions may include part of the day/night (e.g. 11pm – 5am).
- > If the night driving restrictions initiative were to be introduced, it should be accompanied by a soundly-constructed communications campaign to ensure community acceptance, parental endorsement and acceptance of the conditions etc.
- > Additional education, practice and enforcement activities are recommended to enhance the skills and safety of novice drivers (regardless of their age).
- > A reminder to the Policy Development and Communications Teams that there are a number of target audiences, beyond the novice drivers, which will need to be included in the implementation of any or all of these initiatives. These include (but are not limited to) the following:
 - > Police
 - > Parents and families of young drivers
 - > Other drivers.

Centre for Automotive Safety Research The Centre’s submission supports all initiatives:

Passenger restrictions: Supported due to the evidence supporting the link between carrying passengers and crash risks. There is no evidence (from states where passenger restrictions apply) to justify claims that restrictions lead to greater numbers of cars on roads.

Night driving restrictions: Supported due to the evidence supporting the link between novice night driving crash risks. Also supported is the need for exemptions and the provision of night driving experience for novice drivers.

Raising the minimum driving age: Strongly supported.

Extension of the minimum provisional licence period: Supported. Through increased driving experience under

GLS restrictions, young drivers will be at reduced crash risk when attaining a full licence.

Removal of regression penalties: Supported, “as there is no evidence of benefits from the regression requirement and a possibility that it may produce unintended negative consequences”.

Monash University Accident Research Centre (MUARC):

Injury Research Institute This submission noted research evidence from other jurisdictions having the GLS initiatives in place that shows positive effects on youth road safety. As well, this research indicates a greater level of support than before the initiatives were implemented:

“Enforcement appears not to be an onerous task since, for example, many parents play a role in policing the restrictions. Additionally, reductions in road trauma attributable to the initiatives have led to politicians responsible for implementing comprehensive licensing systems enjoying additional support rather than retribution. Finally, and of most significance, feedback from young rural drivers (in the United States) following the introduction of the restrictions shows overwhelming support for the restrictions; young rural drivers either strongly agreed (10%) or agreed (53%) with the restrictions.”

“It is time for jurisdictions such as yours, to take more comprehensive action to reduce the growing burden of young driver road trauma. There is strong evidence to support the implementation of the proposed initiatives. Until such time as these initiatives are incorporated into the existing Graduated Licensing System, it is unlikely that the over-representation of young drivers in the South Australian road fatality and injury statistics will change.”

Motor Trade Association of South Australia Inc. (MTA)

While recognising that the initiatives “have at their heart a desire to protect the lives of young drivers”, the MTA indicated support but also concerns, in particular, the Discussion Paper’s lack of statistical data supporting that these initiatives have already been successful across other Australian states and territories.

Passenger restrictions: This, MTA supported with the proviso that it is subject to the same exemptions as are in place in Queensland, Victoria and NSW, to enable apprentices to be accompanied by a senior mechanic as a passenger when test driving and additional allowances for emergency situations.

Night driving restrictions: The MTA is not opposed to night driving restrictions, provided the exemption grounds include education, training and employment.

Raising the minimum driving age: The MTA expressed concern at the impact on the mobility of young apprentices, curtailing their ability to attend employment and education sites, particularly those in the automotive industry and those in regional/rural locations. The MTA added these sectors suffer from an existing skills shortage and often require young people to use vehicles as an integral part of their job (e.g. test driving vehicles, picking up spare parts, driving between worksites and townships etc.) The MTA noted that exemptions to this restriction would need to take the above concerns into account.

Extension of the minimum provisional licence period: The MTA is concerned that this may create further barriers to older youth wanting to enter the motor industry.

Professional Driver Trainers Association (SA) Inc. The association considers the proposed changes would create significant stress on the State's driver training industry, the "400 small businesses who are struggling hard at the moment" and create hardship and financial pressure upon the public. The submission requests that further thought and discussion occurs prior to legislating any of the proposed changes.

Royal Automobile Association of SA Inc. (RAA) The RAA commented:

Passenger restrictions: The RAA supports with appropriate exemptions, including for employment, family circumstances or hardship.

Night driving restrictions: The RAA supports with appropriate exemptions.

Raising the minimum driving age: The RAA will only support this if it is accompanied by an increase in the minimum required supervised driving hours to at least 120 hours. An increase in Provisional Licence age would also need to be accompanied by:

- > the development of an exemption system for those who suffer genuine hardship and require a provisional licence to access education and/or work
- > a commitment to review and report on the impacts of this initiative after 3 years
- > recommendation of a review to be undertaken to ensure that driving hours are not falsely recorded.

Extension of the minimum provisional licence period: Supported.

Removal of regression penalties: Supported.

Two related recommendations were included by the RAA:

- > in the event that the Provisional Licence age remains at 17, the RAA strongly urges the Government to increase the minimum supervised driving hours to at least 120
- > that consideration should be given to introducing mandatory rehabilitation/counselling programs for repeat offenders.

Royal Australasian College of Surgeons (RACS) In its submission, RACS congratulated the Government for the consideration of "significant changes" and supports all of the proposed initiatives, which are "synergistic" with the position statements developed by the national RACS Road Safety Advisory Committee.

SA Ambulance Service (SAAS) The SAAS submission, forwarded through Minister John Hill, commented:

"... the GLS creates a risk to SAAS's ability to deploy degree graduate recruits due to licence restrictions on younger drivers.

Of more than 32 new paramedic recruits each year, the predominant age is 18-21... SAAS also draws a significant number of its rural volunteer ambulance staff from the community's younger population."

"This means SAAS would not be able to recruit for at least two years with immediate effect, needing instead to recruit degree graduates who are qualified but unemployed for at least two years. Degree graduates would also not be able to complete the internship phase in the fourth year of their degree which would prevent their qualification."

In addition, SAAS commented:

Passenger restrictions: Requires a guarantee of exemption for SAAS paid staff and volunteers; both for driving while on duty and travelling to and from the work site:

- > it's common for two ambulance officers to be aged under 21 years
- > it's common for one of these to be driving and the other to be treating a patient and unable to undertake QSD supervisory activities
- > SAAS cannot guarantee that other passengers are eligible as QSDs.

Night driving restrictions: Requires a guarantee of exemption for SAAS paid staff and volunteers; both for driving while on duty and travelling to and from the work site (for the same reasons as stated above).

Raising the minimum driving age and Extension of the minimum provisional licence period: Currently, SAAS recruits from candidates aged 18 years and above but the proposed initiatives would delay this process owing to the need to ensure that all staff and volunteers possess an unrestricted driving licence.

Removal of regression penalties: Supported as will not impact on the operations of SAAS.

South Australian Farmers Federation (SAFF) SAFF commented:

“The restrictions that are being proposed particularly on the number of passengers and travelling at night, plus raising the minimum age are all going to have an adverse impact and will be a huge burden on rural families and farm businesses, which will extend across all rural areas of South Australia”.

“These proposals are only going to further encourage the drift of young people from the country to the city”.

Specific concerns were:

Passenger restrictions: consideration needs to be given to allowing exemptions on the basis of employment, family circumstances and hardship.

Night driving restrictions: may restrict educational, community, sport and social activities and extending the reasons for an exemption will need to be considered.

Raising the minimum driving age: This is of most concern because it will limit the activities and opportunities of many rural youth. In addition, it will place further pressure on family members and neighbours over the age of 21, as these are already “stretched and often at breaking point”. Consideration should be given to providing exemptions for 17 year olds to “drive solo” in certain circumstances (e.g. a farming family).

Related recommendations were:

- > If these proposals are introduced, there need to be exemptions for those living in rural areas, and for a range of reasons including employment, family circumstances, community responsibilities and hardship.

- > There would need to be no costs charged when providing these exemptions.
- > It is recommended that the Government place more emphasis upon existing road safety activities, such as:
 - > driver education and safety, commencing at school level
 - > creating attitudinal changes to reinforce the need to abide by road rules
 - > improved policing of road rules.

Service to Youth Inc. (SYC) SYC commented:

“This reform will have a huge impact on the life of a disengaged young person in relation to their ability to access employment opportunities, connect back with education, find suitable long term housing opportunities, or connect back with their community. SYC is strongly in favour of educational reform rather than putting in place restrictive measures”.

Passenger restrictions: SYC supports this initiative, provided that the proposed exemptions are also implemented.

Night driving restrictions: SYC is opposed due to:

- > Restrictive of access and employment opportunities
- > Absence of public transport during the late night hours
- > Should focus on educating for safe night driving
- > Highly disruptive for those living in suburbs and regional areas without alternative forms of transport and/or who have long distances to travel
- > Will place many in vulnerable situations as they opt to sleep in cars or stay out past 5am to avoid the restriction.

Raising the minimum driving age: SYC is opposed to this initiative due to the effects on education and employment opportunities as well as families. Other comments were:

“It will do more damage than good, leaving many young people stranded for options between the age of 17 and 18, which is a very important stage in a young person’s life in relation to education and employment pathways”.

“Whilst delaying the age of a young person accessing a provisional licence to 18 will significantly reduce the number of serious or fatal accidents for 17 year olds in SA, this initiative will only result in a significant spike in the number of 18 year olds involved in serious or fatal accidents.”

Extension of the minimum provisional licence period: SYC is opposed because the proposed process (5 years) is considered to be excessive – unless this is also accompanied by a “series of ongoing education and training programs for young drivers” (e.g. consequences of drink driving).

Removal of regression penalties: supports this initiative without reservation.

Related recommendations were forwarded by the SYC:

- > “To focus on teaching young drivers how to successfully manage peer relationships when operating a vehicle.”
- > “To provide ongoing education and training through the licensing process, covering attitudinal learning as well as practical driving skills.”

Transport Training Solutions (TTS) TTS commented:

Passenger restrictions: Removing the potential to distract the driver from their core task is a “positive step”.

Night driving restrictions: TTS does not support as it would place undue restriction on the mobility and liberty of young drivers.

Raising the minimum driving age: Not supported. It would be difficult to administer and not likely to have equitable outcomes across the target population, e.g. those in, or seeking, employment, attending education, and those in rural and regional communities. Others affected by this proposed initiative include:

- > Trades experiencing skills and recruitment shortages
- > Families relying upon older siblings to transport those younger
- > Families (working) who cannot, or find it difficult, to provide transport for youth.

“This measure is in conflict with *South Australia’s Youth Strategy 2010-2014, Education, Employment and Skill Development*, action 34 to ‘Investigate and develop a range of initiatives that support young people to gain and retain their driver’s licence, particularly for employment purposes.’”

“Newly licensed drivers are a higher crash risk because of their lack of experience rather than just because of their age. These drivers are just as likely to have a crash in their first months of driving whether aged 17 or 18.”

“...there are many disadvantaged youth that are driving unlicensed in desperation to secure employment, creating a vicious circle as they commit a more serious offence when caught that causes them to lose their employment.”

Extension of the minimum provisional licence period: TTS agrees that “a longer period alcohol-free and knowing you need to be on your ‘best behaviour’ to avoid losing your licence via demerit points is likely to result in better safety outcomes”.

Removal of regression penalties: “We agree that re-passing a test that has already been passed does not improve the safety of a disqualified young driver”.

Related recommendations and observations of TTS were:

- > TTS supports the assertion that the framework for education, supervised driving practice and training needs to be improved so that learner drivers are better prepared prior to taking the wheel independently. Education should be comprehensive and address underpinning knowledge and attitudes as well as practical driving skills.
- > Raise the minimum number of practice driving hours (rather than calendar months elapsed).

TTS supports any measures which enforce the requirement to truthfully report supervised driving entries:

- > Other states have a provision to allow for time spent with an accredited Motor Driving Instructor to count for more hours in the supervised practice log book than time with a parent/caregiver. TTS recommends that this be adopted in SA.
- > TTS suggests replacing the Hazard Perception Test as the requirement to progress to a P2 licence, with further in-vehicle training and assessment with an accredited Motor Driving Instructor.
- > TTS also suggests the employment of psychological screening for new drivers to identify those “at risk” (and therefore in need of additional support).

University of New South Wales (UNSW) UNSW cited research from other jurisdictions and countries supporting the initiatives and commends the South Australian Government on the proposals:

“If successful, South Australia would be the leading jurisdiction in Australia to introduce world’s “best practice” in graduated driver licensing in terms of including both a passenger restriction and night driving restriction.”

UNSW also recommends that, should the initiatives proceed (in part or wholly), competent monitoring and evaluation of results of each initiative should be conducted to ensure best practice and to educate and inform other jurisdictions. For night driving restrictions, UNSW recommends South Australia research young driver crash rates for between 10pm and midnight to determine if night restrictions should commence earlier than midnight.

Youth Affairs Council of SA (YACSA) YACSA's submission was very detailed and was supported by extensive references. YACSA's comments included:

"Despite the over-representation of young people in crash statistics, the vast majority progress from their learner's permit through to their full licence without incident, meaning that additional restrictions placed on young drivers have an adverse effect disproportionate to any possible effect on road safety."

YACSA indicated it does not support any of the initiatives owing to the view that they will result in too many restrictions (deemed unnecessary) upon the majority of young drivers, who comply with road rules and licensing requirements. YACSA added:

"Research suggests that the most effective way to reach this group, and modify their behaviour, is through targeted interventions involving alternative forms of media, training and early intervention – a marked contrast to the Government's proposed initiatives."

"Targeting young drivers with the restrictions... in the absence of a more holistic approach, will only detract from the Government's efforts to protect young drivers."

Specific concerns on the initiatives included:

Passenger restrictions:

- > YACSA disputes that passengers are necessarily the cause of crashes and can, in fact, be employed to act as supporters for a novice driver through the sharing of driving tasks and positive peer pressure.
- > The restrictions would remove the ability to appoint a designated driver among a group and therefore may increase risky behaviour and the removal of a degree of acceptance of those who choose to not drink alcohol or take drugs.
- > The restrictions present a range of problems (e.g. employment, education, social etc.) for those living in regional, rural or other areas isolated from public/alternate transport.

- > They will increase the cost of travelling (i.e. shared car/ shared cost).
- > They present a range of problems for those inhabiting Culturally and Linguistically Diverse (CALD) groups (e.g. employment, education, social etc.).
- > They present a range of problems for Indigenous communities (e.g. employment, education, social etc.).
- > They present problems for people acting as a short-term carer for an ill or disabled person.
- > They present safety issues for young people (particularly women) if left without transport.
- > They may be inconvenient and often unworkable for the parents and extended family of youth, on whom the transport burden may fall.

Night driving restrictions:

- > YACSA considers that these should be applied to all drivers rather than just to young drivers.
- > YACSA advises that research suggesting young people are not psychologically developed enough to make competent decisions about their own lives (such as in relation to night driving) is relatively new with as yet no conclusive findings, but also fails to take into consideration the context in which young people make decisions.
- > The restrictions are too difficult for police.
- > Too few young drivers are on the roads during the proposed curfew times.
- > The restrictions would represent an unacceptable limitation on the freedom of young people, particularly those in rural/regional areas.

Raising the minimum driving age:

- > This will prevent training and employment opportunities,"...the vast majority of employers simply will not employ a young person who is unable to provide their own transport when required."
- > "For those young people who have left school to pursue a trade-based career, this represents an additional year in which they may have to rely on Centrelink benefits or family funds to meet their costs of living."
- > The Government's consideration of exemptions with a provisional licence age of 18 means the Government recognises that a significant number of young people require a driver's licence to participate in employment and education, but then proposes a licence restriction that impacts on their ability to do so, and then adds a way for young people to ensure they are exempt from the restriction, thus rendering the whole proposal meaningless.

Extension of the minimum provisional licence period:

- > This initiative's exemption for drivers aged 25 or older amounts to age discrimination.
- > It is an "inefficient way of encouraging behaviour which already occurs" — this in relation to a tendency for many young people to hold their provisional licence for longer than the currently required two years.
- > A better approach would be to "actually teaching young people how to drive".

Removal of regression penalties:

- > YACSA disagrees with this on the basis that, if implemented, it will mean that the other four initiatives have come into effect.

YACSA suggested a number of alternative strategies and tactics to be implemented to achieve better youth road safety outcomes:

- > Examination of the Norwegian "Speak Out!" program, which encourages people to confront their peers about risky driving.
- > Educate parents and extended families about the support they should provide and limits they should place on novice drivers to enable them to ease their way into gaining experience and confidence on the roads.
- > Educate parents on early role modelling of acceptable driving behaviour.
- > Educate parents on how to become effective driving supervisors.
- > Provide evidence that past initiatives (e.g. increase from 50-75 hours of supervised driving) have been successful before progressing to new, untested implementation.
- > Provide subsidies for young drivers to receive accredited driving instruction.
- > Remove age discrimination from this discussion paper and refer to all as "novice drivers" and ensure that all rules are based upon experience rather than age.
- > Examine and implement workshops, based on the "Attitudinal Driving" series delivered by the Queensland Police Service, prior to applications for Learner's Permits.
- > Investigate a "Whole of Community approach" to road safety and the education of novice drivers.

Local Government Submissions

Adelaide Hills Council Youth Advisory Committee advised the Committee's view that the GLS initiatives "unfairly disadvantage young drivers in rural areas as they diminish young drivers' chances of transitioning smoothly into adulthood", and added:

Passenger restrictions will result in "more cars on rural roads at night time on Friday and Saturday nights, in disregard of the curfew" and unwanted side-effects (e.g. travelling in the boot of a car).

Exemptions for family members: members of a family can be just as distracting and a source of (negative) peer pressure.

Raising the minimum driving age: is not supported because it will result in "shifting the casualties up the age range" and "the unfortunate pairing up of independent driving age and drinking age". This will also have "dramatic consequences" on the independence and development of young people in rural and regional areas owing to the resulting limitations of access to education, employment, training, entertainment and social activities. It will also increase dependence upon parents and "foster risk taking behaviour, such as drink driving, unlicensed driving and getting too many people in one car".

Raising the minimum driving age and extension of the minimum provisional licence period: will result in "shifting the casualties up the age range".

Youth discrimination: the proposals are considered discriminatory against young drivers compared with proportions of people aged under 16, older drivers and drink drivers involved in crashes.

The proposals do not address the many of the causes of crashes: road safety is an issue which encompasses a range of ages and issues. The proposals were described as being "a quick bang for a relatively low investment and a cheap political move". "This approach lacks consideration of many other factors influencing road safety".

The Youth Advisory Committee requested that the following suggestions are taken into account:

- > Retain current age limits but prolong the P1 period
- > Introduce incentives to "do the right thing"
- > Address the issues of drunk driving and seatbelt wearing
- > Address the need for, and provide resources to improve driver education and risk awareness.

Alexandrina Council – Southern Fleurieu Youth Network made the following comments:

Passenger restrictions:

- > Potential to increase on-road racing
- > Will increase numbers of cars on roads, due to inability to car pool

- > Will increase illegal behaviour, especially in country areas, and at night, where detection is easier to avoid
- > Will increase risky behaviours as a way of avoiding detection for carrying excessive passengers
- > Will generate revenue through increased numbers of vehicle registrations
- > Increased risk of teen drunk driving (i.e. inability to car pool).

Raising the minimum driving age:

- > Will increase pressure on families (i.e. transporting children), particularly in rural areas and in larger families
- > Impact on those working, attending education (e.g. TAFE)
- > Will negatively affect youth participation and engagement within the region.

Extension of the minimum provisional licence period:

- > Will increase pressure on families (i.e. transporting children), particularly in rural areas and in larger families
- > May cost Government more, due to increase in illegal behaviour
- > Some drivers make mistakes or do unwise things, no matter their age (therefore will make no difference to safety).

Other comments were:

- > More driver education/safety courses as a mandatory requirement
- > Incorporate driver training into secondary education
- > A need for evidence supporting these proposals to be available
- > Improve public transport in the region
- > Improve access to education in the region.

District Council of Cleve expressed concerns on the basis that “once again, the rural community will be disadvantaged”, noting that:

- > Young drivers will not be able to “drive solo” until they are at least 18 years old
- > The initiatives remove independence from young drivers and their families
- > Rural communities “don’t have the luxury of the greater Adelaide public transport system”
- > Youth will now find it harder to be productive in the workforce and communities will suffer, owing to the shortage of skilled workers.

District Council of Grant submitted the following comments:

Passenger restrictions: Council considers these will create difficulties in rural and regional areas. Further exemptions are suggested (i.e. to include older youth driving younger siblings to school and work).

Night driving restrictions: Recommended that further consultation and development occurs to ensure broader and clearer exemptions.

Raising the minimum driving age: Council does not agree with this initiative because of the “effect on communities in rural and regional areas”, particularly with respect to lack of public transport.

Extension of the minimum provisional licence period: Council agrees to the extension to three years as this would create greater interstate consistency.

Removal of regression penalties: Council agrees with this initiative.

Two related recommendations were forwarded by the Council:

- > To include resourcing for the provision of defensive driving courses for youth.
- > To ensure that there is clear communication surrounding the changes to the GLS, i.e. “what exemptions will be applicable, how readily they will be able to be obtained and at what cost” so as to ensure that the GLS initiatives are both practical and useful.

Kingston District Council expressed concerns relating to the proposed initiatives, describing them as “ill-conceived and do not take account of rural and regional South Australians; who in the vast majority do not have access to alternative and affordable transportation, such as public transport”.

Council objects “to proposed changes to learner’s and permit driving licence systems for youths, as the policy is unworkable especially for those in rural and regional areas where no or limited access is available to cost-effective public transport systems, further disadvantaging the ability of rural and regional South Australia to access services, jobs and education opportunities.”

City of Marion supports the five initiatives but also provided suggestions for their enhancement:

Passenger restrictions: supported

Night driving restrictions: supported with the suggestion for an additional exemption covering “emergency situations”

Raising the minimum driving age: supported
Extension of the minimum provisional licence period: with the suggestion that passenger restrictions also apply

Removal of regression penalties: supported with the suggestion for an additional restriction for provisional drivers from driving together in groups of vehicles (i.e. to reduce distraction and inappropriate competitive behaviours).

The Rural City of Murray Bridge provided feedback on behalf of the Murraylands Youth Action Committee. This submission concluded that the GLS initiatives would have negative and isolating impacts on young people in the rural area of the Murraylands. It was thought that, while acknowledging the exemptions under consideration, the proposed initiatives would curtail opportunities for young people to participate in education, employment, social and recreational activities:

Raising the minimum driving age: would have little effect on the risks associated with novice driving as 18 year old novice drivers lack experience to the same degree as 17 year old novices. Raising the age would also not allow people to get necessary experience in driving with other people in the car, and would also coincide with legal age for drinking alcohol.

Passenger restrictions: exemptions should include provisions for carpooling for the purposes of attending training, employment and sporting activities, as well as transporting younger siblings. “Negative effects on parents” transporting the under 18s to educational locations were also mentioned.

Night driving restrictions: may increase the incidence of “drunk walking” and have “undesirable consequences” for parents of young people. The submission also mentioned that this defeats the purpose of designating a sober driver for transport to and from social occasions.

The Youth Action Committee also recommended inclusion of defensive driving courses included as part of the requirements to gain a P1 licence.

City of Norwood Payneham and St Peters Youth Advisory Committee expressed a number of concerns and noted that education, training and stronger driving programs are preferred.

“The YAC do not understand why such harsh laws are being imposed when really it is only a small percentage of the population who are doing the wrong thing ...These laws are going to put barriers in the lives of young people and may force them to break the law so that they can go about their (usual) lives”.

Passenger restrictions: one passenger only may frustrate young people and be a barrier to designated driver arrangements.

Night driving restrictions: concerns include: restrictive to young people who work, study, socialise, no public transport, therefore no means of travelling late at night.

Raising the minimum driving age: concerns include: restrictive to young people who work, are in traineeships, living away from parents or in rural areas.

Extension of the minimum provisional licence period: this, combined with other proposed initiatives is “hugely restrictive for young adults”.

City of Port Adelaide Enfield, Mr Gary Johanson, Mayor, wrote in a personal capacity, complimenting the Minister and State Government for “trying to protect our road going youth”.

City of Salisbury comments were:

Passenger restrictions: need to ensure that exemptions are clear, low-cost and allow for workplace flexibility (i.e. changing times, voluntary work, student placements, job interviews etc.), as well as family/personal emergencies/hardship.

Night driving restrictions: concerns about the impact on youth unemployment (ability to gain employment if a restricted driver), as well as on youth whose work occurs at night.

Raising the minimum driving age: concerns that 17 year olds will be denied employment opportunities, exacerbating an existing district employment problem, along with limited access to public transport.

South East Local Government Association, while supporting the overall aims of the *Towards Zero Together Road Safety 2020* strategy, stated that the GLS initiatives do not take the needs of rural and regional South Australians into account owing to the negative consequences that they will have on youth employment, education, training and social activities.

The effect of these proposed initiatives would “disproportionately disadvantage young people for very little gain”.

Tatiara District Council acknowledged that its comments do not specifically address the GLS initiatives, but raised for consideration the introduction of penalties for passengers who knowingly travel in vehicles driven by persons who contravene safe driving regulations and legislation (e.g. exceeding prescribed alcohol levels, affected by drugs, speeding). Council considered that this suggestion would encourage better behaviour and/or better outcomes due to positive peer pressure and improved decision making by passengers.

Wattle Range Council wrote that, while it commends the State Government for “ongoing efforts in attempting to reducing our road toll”, it is the Council’s view that the majority of the proposed initiatives will present problems as follows:

Passenger restrictions: would undermine the “designated/sober driver” message, would “severely disadvantage” young people in Wattle Range, owing to the lack of public transport and may increase the number of vehicles on country roads which are driven by people aged under 21.

Night driving restrictions: would “severely disadvantage” young people in Wattle Range, owing to the lack of public transport and may increase the number of vehicles on country roads which are driven by people aged under 21.

Raising the minimum driving age: would “severely disadvantage” young people, especially in terms of employment (i.e. inability to travel to work, lack of public transport).

Wudinna District Council submitted it does not support the proposals compared to viable alternatives, including education combined with better police visibility and enforcement. Specific concerns were:

- > restricted access to work, education and recreation
- > the “unreasonable and impractical proposition” of a curfew
- > the imposition of “unfair restrictions on the majority, who are in the main, responsible and capable individuals”.

District Council of Yorke Peninsula commented:

Passenger restrictions: Will compound problems experienced by families in regional areas, making it more difficult to transport younger siblings, unable to attend education & work, cause social isolation. Supports better driver education instead.

Night driving restrictions: Described as “unrealistic” and potentially socially isolating.

Raising the minimum driving age: Will compound problems for transport as currently experienced by families in regional areas, making it more difficult to: transport younger siblings, inability to attend education and work, and cause social isolation.

Extension of the minimum provisional licence period: Agree

In addition, Council called for more and better young driver education.

Community Road Safety Group Submissions

Adelaide Hills Community Road Safety Group wrote that it strongly believes the proposed changes will unfairly disadvantage young drivers in rural communities and will lead to increases in risky behaviour and other “significant negative consequences”. The group added that the initiatives will curtail youth mobility and restrict (or deny) their access to education, employment, services and entertainment, owing to a widespread lack of alternative (to personal vehicles) transport options.

Passenger restrictions: “will undo much of the good work already carried out with respect to nominating a designated driver among young peer groups and actually lead to increased drink driving” and “will result in more cars on rural roads at night time on Friday and Saturday nights increasing crash risk through exposure”.

Barunga West Community Road Safety Group commented:

Passenger restrictions: Supported

Night driving restrictions: Supported

Raising the minimum driving age: Not supported – will disadvantage young people in regional areas needing a licence for work, education or transport from isolated areas.

Extension of the minimum provisional licence period: Supported

Removal of regression penalties: Supported.

In addition, the following recommendations were made:

- > Improve road safety education and increase driving skills across a range of road surfaces. This to commence earlier, in schools.
- > Implement a range of harsher penalties for “hoon” driving.

Roxby Roadsafe (Roxby Downs Community Road Safety Committee) commented:

Passenger restrictions: Supported, citing “too many accidents involving cars with multiple passengers”

Night driving restrictions: Supported, citing tired, not alert drivers and risks from other road users

Raising the minimum driving age: Supported – an extra year brings greater maturity and experience

Extension of the minimum provisional licence period: Supported

Removal of regression penalties: Supported, brings SA in step with other states.

In addition, changes to the display of L and P plates were suggested (i.e. to affix near registration plates).

Members of Parliament Submissions

Hon John Hill MP, Minister for Health and Ageing, advised that he supports all initiatives, based on research on the risky behaviours of young drivers. In particular, he noted, “There is a definite element of risk-taking behaviour due to immature age, implying that any effort to postpone the age of first licensing will pay dividends in reducing the road toll.”

Hon Ian Hunter MLC, Minister for Youth, introduced the Office for Youth’s submission. The Office for Youth perceives a clear alignment between the proposed GLS initiatives and the *South Australia’s Youth Strategy 2010-2014 youthconnect* priority of Health and Wellbeing.

In particular, extension of the minimum provisional licence period was supported as it was considered to provide young

people with the opportunity to improve their driving skills. The Office for Youth also supported removal of regression penalties, provided the current Safer Driver Agreement option for disqualified drivers remains in place.

The Office for Youth’s concerns related to the impact of reduced abilities of youth in gaining driver’s licences and flow-on impacts affecting youth prosperity and wellbeing, as follows:

Passenger restrictions would have a negative impact upon some young people, particularly in rural areas and the Office supports exemptions similar to those in NSW and Victoria. In addition, the Office considers further definition and clarification should be provided to any exemption system with respect to driver eligibility and availability of alternative transport options rural areas.

Night driving restrictions would have a negative impact upon some young people, particularly in rural areas and the Office suggests that a 1am start is more appropriate provided that exemptions are also developed and clarified as the Office discussed under passenger restrictions. Alternative transport options in rural areas should also be explored.

Raising the minimum driving age would have a negative impact upon some young people, particularly in rural areas. The Office holds concerns that youth becoming eligible for both a driver’s licence and consuming alcohol at age 18 may present additional temptations to those which already exist. The Office recommends broad communications about the GLS changes, but particularly for young males, and to highlight the zero blood alcohol limit for new drivers as well as exploring alternative transport options in rural areas.

Mr Steven Griffiths MP JP, Member for Goyder, wrote on behalf of a 14 year old constituent who is concerned that the initiatives are unfair to “country kids” because they do not have access to public transport and cannot travel from “farm to farm”. In addition, Mr Griffiths noted that people in regional areas will be severely disadvantaged by the initiatives because they will reduce independence and the ability to participate in education, work and social engagement.

Mr Alan Sibbons MP, Member for Mitchell, expressed support for passenger restrictions, night driving restrictions and extension of the provisional licence period providing the applicable demerit point allowance is also raised.

Mr Sibbons supports removal of regression penalties. He was not supportive of raising the minimum driving age due to his concerns about social and economic impacts such as restricting access to work and education.

Hon Dr Bob Such MP, Member for Fisher, made a submission in which:

Passenger restrictions were supported in principle but drew attention to those who rely on designated drivers to transport them after alcohol consumption. Dr Such also mentioned concerns for rural residents who are unable to access public transport or use parental transport.

Night driving restrictions were supported in principle but reiterated the above concerns. Dr Such also requested a significant improvement in night-time public transport.

Raising the minimum driving age was not supported due to concerns that it would:

- > “Penalise youth
- > Penalise rural residents owing to the lack of public transport, reduction of employment opportunities
- > Cause youth unemployment”.

In gaining a provisional licence at 18, Dr Such would prefer a gap in the time between gaining one’s licence and the legal drinking age.

Extension of the minimum provisional licence period: not supported due to:

- > “Unnecessarily restrictive, heavy-handed
- > Emphasis should be redirected towards driver training, including the use of driving simulators to improve driver responses to difficult situations”.

Removal of regression penalties: Dr Such supported, but while describing these penalties as being unnecessarily harsh, also proposed that harsh penalties be imposed for serious offences such as hoon driving, dangerous driving and excessive speeding.

Hon Russell Wortley MLC, Minister for Industrial Relations, commends and supports the initiatives and encourages consideration of exemptions to reduce hardship to young workers, for little or no fee to the applicant.

KEY ISSUES

The purpose of the Discussion Paper was to provide an opportunity for key road safety stakeholders and members of the public to comment on the proposed Graduated Licensing Scheme (GLS) initiatives through the paper's "Have Your Say" feedback facility. Respondents were asked to express their thoughts on each initiative in order to inform Government decision making.

Responses ranged from single brief comments to very detailed and lengthy responses, and many respondents made multiple comments when giving opinions on any one initiative. In total across the responses, 9541 comments were received and each was summarised under one of the GLS initiatives.

Under each GLS initiative, responses included clearly supportive or other positive comments, comments that were supportive depending on certain conditions, and other comments including non supportive comments and matters respondents considered relevant but not addressed in the Discussion Paper.

As a guide to the proportion of respondents who were deemed to be supportive or non-supportive of each initiative, relevant percentages were provided. These percentages should not be taken as indicative of overall levels of support due to the proportions of respondents making other comments where level of support was not clearly evident. As well, the comments received represent those who chose to respond to the feedback opportunity and are not necessarily representative of views in the wider community. A scientifically-based random sampling of the South Australian population, for example, might produce different proportions of support and non-support.

While not seeking to address every single comment, the analyses presented in this report affords insight into the range of themes evident in the collated responses, giving fuller attention to common types of responses submitted by individual members of the public, as well as the various stakeholders. These themes, other key issues identified in the feedback and further issues surrounding some of the initiatives are explored in the following discussion.

Impact on Safety

In addition to many members of the public, a number of road safety stakeholders including medical bodies and research institutes categorically supported various if not all initiatives on road safety grounds. For example, the AMA (SA) Road Safety Committee wrote that the initiatives are "both sensible and defensible upon the medical evidence"

in reference to the research on human brain development. CARRS-Q wrote that the initiatives are "grounded in best practice" for GLS nationally and internationally.

The effectiveness of interstate GLS compared to South Australia is illustrated in the following table, which shows that South Australia has the second highest fatality rate for road users aged 16-19 of all Australian States and Territories. South Australia's fatality rate in this age group is more than twice that of NSW and Victoria and nearly twice Queensland's rate and the national average.

State/Territory	Average number of fatalities aged 16-19 years (2008-10)	Population (16-19 years)	Fatality rate (16-19 years)
NSW	39	386,203	10
VIC	29	295,103	10
QLD	31	251,963	12
SA	18	86,922	21
WA	20	126,244	16
TAS	5	27,925	19
NT	5	13,512	35
ACT	1	19,811	5
Australia	148	1207683	12

While strong responses against the initiatives often came from rural areas, young drivers aged 16-19 in rural South Australia are 2½ times more likely to die or be injured in a crash than their peers in metropolitan Adelaide.

Based on statistical modelling studies conducted by CASR, it is estimated that implementing passenger restrictions in South Australia would result in a reduction of 12 to 17 fatal and serious injuries per year, for night driving restrictions 8 to 12 fatal and serious injuries per year, for raising the provisional age at least 60 to 70 fatal and serious injury crashes per year.

Impact on Mobility

The most common theme among respondents deemed to be non-supportive of the initiatives was the perceived impact on the mobility and independence of young people in accessing study, employment and recreational opportunities, but also on rural families and communities more generally. The South Australian Farmers Federation, Service to Youth Council and

Youth Affairs Council of South Australia, in particular, provided detailed comment in this light, especially in relation to passenger restrictions, night driving restrictions and raising the provisional licence age to 18. Specific concerns expressed related to effects on designated driver programs and car-pooling (discussed later).

The Department of Planning, Transport and Infrastructure (DPTI) has investigated the numbers of apprentices, trainees and vocational education students in South Australia who might be affected by an increase in the minimum provisional licence age to 18. For example, apprentices/trainees aged 17 years make up 10% of 17 year olds in South Australia. The impact would be confined to those who have obtained a learner's permit at age 16 and intend to apply for a provisional licence soon after their 17th birthday, presumably for the purpose of driving to and from work or in the course of their employment.

Apprentices/trainees who are currently only 16 years of age, and must hold a learner's permit for a minimum of 12 months, are currently having to attend their workplace by some means other than by driving themselves to work — whether this be through family members, public transport, car pooling or similar. While there would undoubtedly be an impact resulting from a blanket change to the provisional licensing age from 17 to 18, it is also possible that this method of transport could continue for these drivers until they turn 18, should the provisional licensing age be raised in South Australia.

Also, the majority (57%) of apprentices/trainees aged 16 to 19 years work in key regional urban centres or metropolitan Adelaide where public transport is more easily accessible.

Within the broader workforce, between 50 and 80% of 17 year olds are engaged in work in some capacity, depending on whether or not the person is also participating in an education program. Workforce participation rates include full-time, part-time and casual work.

Generally in relation to the overall impact on mobility, it should be noted that other Australian jurisdictions already have in place forms of the GLS initiatives the South Australian Discussion Paper canvasses. These include passenger restrictions at night in NSW and Queensland and applying at all times in Victoria, a night driving restriction in Western Australia, a three-year provisional period in NSW, QLD, Tasmania and the ACT, and a four-year period in Victoria. In addition, Victoria historically has had a

minimum provisional licence age of 18. These jurisdictions also have lower young driver fatality rates compared to South Australia.

While saving young people's lives must take precedence over mobility concerns, the interstate experience and an evaluation of California's GLS show that even in localities with large rural areas, young people and their families learn to adapt to GLS restrictions³.

Exemption Systems

The comments received on exemptions were wide ranging and most were made in relation to passenger restrictions. Generally, respondents made suggestions for what they considered to be legitimate grounds for granting exemptions, and these respondents included those who were deemed supportive of a particular GLS initiative but who felt more consideration should be given to the grounds for exemption.

It is recognised that young people have a range of legitimate reasons to drive with similar age passengers and/or late at night, which is why it is proposed that these initiatives should be accompanied by an exemption system. Most international and Australian jurisdictions with passenger and night-time driving restrictions allow exemptions for purposeful driving such as for work, education or emergencies.

There are subtle differences in the way in which exemptions models operate in other jurisdictions and the grounds for exemption vary slightly. In some jurisdictions, a general exemption from the driving restriction is available on specific grounds. For example, family members (i.e. siblings and spouses) are automatically exempt from peer passenger restrictions in both Victoria and Queensland. An automatic exemption is also available for police officers and those required to drive an emergency vehicle while on duty in all three of the eastern mainland states. Under this model, the onus is on the driver to prove that they are driving within the exemption grounds. In the case of an automatic exemption for family members, the driver would need to prove that he/she is in fact related to the passenger/s in the vehicle if a police officer reasonably believes a family relationship does not exist. In Western Australia, an automatic exemption from the night-time driving restriction is available when driving for employment or education/training purposes and drivers need to demonstrate they meet this criterion by carrying a letter from their employer or educational institution.

³ Bates, L, Watson, B & King, M, 2011, Mobility and safety are conflicting goals for transport policy makers when making decisions about graduated licensing, *International Journal of Health Promotion and Education* 48 (2) pp 46-51

Other jurisdictions offer exemptions from the driving restriction on written application to the relevant road traffic authority. For example, New South Wales and Victoria offer exemptions from the peer passenger restrictions upon application on the basis of employment, family circumstances and hardship. Where an exemption is approved, a certificate of exemption is often issued to the driver by the road traffic authority and is required to be carried at all times and shown to police on request.

Jurisdictions that offer an exemption from the driving restriction on written application report relatively low numbers of applications received each year. This suggests that young drivers are able to adapt to the driving restrictions (e.g. by arranging lifts or arriving at destinations earlier) once they have been introduced.

Victoria does not allow any exemptions from its minimum provisional licence age 18 requirement.

Designated Driver Programs

A number of mobility concerns related specifically to designated driver programs where one person in a group elects to be alcohol free, in order to drive others who have drunk alcohol home from a social location such as a hotel or club.

While designated driver programs can be effective for adults, a young driver does not have enough experience to manage additional peer passengers, especially when those passengers may be under the influence of alcohol or other drugs. Unfortunately, research⁴ has shown that young people tend to make inaccurate judgments when trying to calculate their number of drinks over time, to determine if they have sobered up enough to drive. Sometimes, the designated driver is actually the person least drunk, rather than a completely sober driver. Therefore, young people are encouraged to find alternative strategies such as a reliable adult driver or public transport where it is available.

Car-Pooling

Another mobility-related specific concern was the perceived effect on car-pooling initiatives. It is recognised that passenger restrictions in particular would affect young people's ability to transport others. However, as noted above young drivers generally do not have enough driving experience to safely manage more than one passenger.

⁴ www.youngdriverfactbase.com

⁵ *Young Drivers The Road to Road Safety*, 2006, OECD, Paris

Some success has been found with educational programs that teach positive roles to young people when they are passengers, such as in the Norwegian "Speak-Out!" program mentioned by YACSA. Yet, such positive effects are outweighed by the repeated demonstrated effectiveness of GLS containing passenger restrictions⁴ in reducing road trauma among young drivers and their passengers.

Perceived Unfairness

In relation to an increased provisional licence age and provisional period, as well as passenger and night driving restrictions, many non-supportive respondents commented that such measures would be unfair to young people or that the measures would 'punish' all young people for the mistakes of a few. The initiatives are not aimed at making life tougher for young drivers and their families but are about protecting young drivers and saving lives. Most young drivers, indeed drivers of all age groups make mistakes. CASR research shows that in South Australia, over half of all fatal crashes and 90% of injury crashes are the result of mistakes, inattention or common lapses in judgement.

The reason all young drivers need to be subject to GLS requirements is that they are all beginning drivers. They all need time to develop driving skills in the low-risk driving environments that GLS requirements allow. Also, while we know some characteristics of young drivers who are more likely to get into crashes, it is not possible to identify them adequately and intervene before they crash. Most fatally injured drivers do not have prior traffic offences or crashes on their driving records.

Perceived Need for More Driver Training / More Driving Experience

Another common theme across the responses was a perceived need for young drivers to receive more training and/or gain more driving experience, including increasing the number of required hours of supervised driving, defensive driver training and school driver training. These views were expressed irrespective of whether specific GLS initiatives were supported or not.

The proposed initiatives are based on major international research⁵ into GLS operating in the USA, Canada, New Zealand and Australia. While this research recognised the place of driver training and experience in a young driver's development, its overall conclusion is that it is a combination of GLS initiatives, and particularly those

canvassed in the Discussion Paper, that will have the **overall** strongest effect in reducing young driver deaths and injuries.

Many learner drivers in South Australia follow the Competency-Based Training approach to obtain their licence. This existing approach is based on defensive driving principles, which involve scanning the road ahead for hazardous situations and taking appropriate actions before the situations are encountered.

Research does not support advanced driver training involving vehicle control skills (such as handling skid pans and emergency braking techniques) because training in these types of activities has been shown to create overconfidence and increased risks of crashing among the drivers involved.

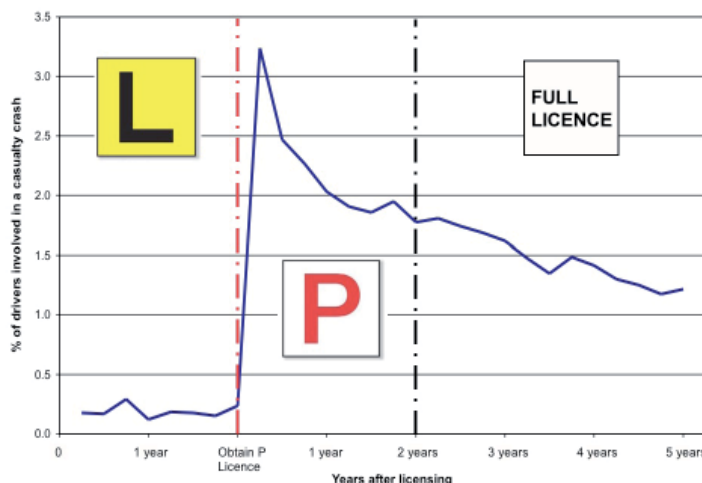
Nationally, school road safety education programs are based on a number of best practice principles, including that these programs should not encourage young people to pursue learning to drive sooner than they need to. Evaluation studies⁶ have shown that the net effect of encouraging school students to obtain driver's licences sooner than they need to is that the overall young driver road toll rises, thereby negating any intended benefits of the programs. While some South Australian high schools offer practical driver training programs, these are generally on an out of hours elective basis.

A priority action in the *Towards Zero Together Road Safety Action Plan 2011 & 2012* is to assess all school-based road safety education programs against best practice principles, with the Department for Education and Child Development as the lead agency.

Shifting the Crash Problem from Age 17 to Age 18

A number of respondents commented that increasing the provisional licence age from 17 to 18 would simply shift the early crash problem experienced by all new provisional drivers from age 17 to 18.

Figure 6 in the Discussion Paper (reproduced here) shows that, irrespective of the age a provisional licence is obtained, the highest crash risk occurs in the first year on that provisional licence.



In addition, studies⁴ show that age 16 drivers have higher crash rates than 17 year old drivers, who in turn have higher crash rates than 18 and 19 year old drivers, even when licence status and total distances travelled are taken into account.

Consequently, when these two trends are merged, drivers who obtain a provisional licence at age 18 will experience their highest crash risk in their first year on that provisional licence. However, that crash risk will be lower than if they had obtained their provisional licence at age 17.

Age 18 is also the Legal Drinking Age

A number of comments in relation to increasing the provisional licence age pointed out that as age 18 is also the age of legal entitlement to drink alcohol, it might create problems for newly licensed provisional drivers being affected by alcohol. It should be noted that the holder of a learner's permit or provisional licence is not allowed to have any alcohol or drugs in their body while driving. These are licence conditions under the GLS and there are tough penalties for any learner or provisional driver caught drink driving. These include licence disqualification, fines, demerit points, even a prison term in some cases, and the time to be spent on a learner's permit or provisional licence is extended once the permit or licence is regained.

⁶ Christie, R, 2007, *The Effectiveness of Driver Training as a Road Safety Measure*, Royal Automobile Club of Victoria, Melbourne

Perceived Increased Cars on the Road

Particularly in relation to passenger restrictions, many non-supportive respondents considered that this would result in more cars being driven by young people on their own, resulting in more crashes and environmental disbenefits. Research reviewed by CASR shows that, even when accounting for greater numbers of young drivers on the road, restricting drivers aged 16 to 17 years from carrying peer passengers could lead to 31 to 42% fewer young driver deaths, based on 90% compliance with the restriction. Consequently, a relatively small increase in additional cars on the road and their carbon emissions could be offset by the savings from reduced activity by police, emergency and medical sectors, and family members as a consequence of achieving fewer crashes involving young people.

Such research also shows that peer passenger restrictions have not resulted in an overall increase in injuries because young people have used alternative transport options such as cycling or walking. There has been no increase in crashes for these drivers once they are slightly older and driving unrestricted.

Communication of the GLS Initiatives

A number of stakeholder respondents in their comments recommended that the Government should take particular care to ensure that any initiatives progressed to implementation are explained in detail and occur well in advance, including coverage of any exemption systems and implementation processes for the initiatives. As well, the communications should be directed to a wide and diverse audience comprising young drivers, drivers to be, other drivers, parents, businesses and the police in communication formats best suited to those groups. The communications ought to also attempt to counter views about the GLS initiatives that are not consistent with the research evidence, as in some of the above examples.

Evaluation of Implementation

A final main theme in the comments, notably made by Australasian College of Road Safety, RAA, CARRS-Q and the University of NSW, was to ensure that for any initiatives implemented, their effect on road safety should be monitored and evaluated. This should involve pre and post measurement of road safety indicators such as traffic offences and crashes.

**Outcomes from the Public Consultation
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Discussion Paper**
www.sa.gov.au/towardszerotogether



Government of South Australia
Department of Planning,
Transport and Infrastructure