

18 October 2011

P: 1300 76 50 50  
E: [general@nationalseniors.com.au](mailto:general@nationalseniors.com.au)  
W: [www.nationalseniors.com.au](http://www.nationalseniors.com.au)

Older Driver Licensing Review  
Registration and Licensing Branch  
Department of Infrastructure, Energy and Resources  
GPO Box 1002  
Hobart Tasmania 7001

To whom it may concern,

**Submission to the Department of Infrastructure, Energy and Resources' Review of the Older Driver Licensing System in Tasmania**

National Seniors Australia (NSA) welcomes the opportunity to submit comments relating to the Department of Infrastructure, Energy and Resources' (DIER) Review of the Older Driver Licensing System in Tasmania. More broadly, NSA welcomes DEIR's commitment to review the current system of mandatory testing for older drivers and its' commitment to an evidence-based system.

By way of background, NSA is the country's largest organisation representing the over 50s, with over 270,000 members nation-wide including Tasmania. This broad-based support enables NSA to provide a well informed and representative voice on issues of concern for people aged 50 and over.

As a general principle, NSA believes that there is no adequate answer to the question *How old is old?*, and that subsequently, an assessment system of driving skills needs to be ability-based, rather than age-based, especially as the latter is likely to introduce elements of age discrimination.

The Discussion Paper recognises the evidence from recent research and includes statistics from both jurisdictions with, and jurisdictions without, mandatory testing of older drivers. This evidence shows that:

1. Older drivers are no more of a road risk than other groups of drivers;
2. The relatively high mortality rates of older drivers in accidents are a direct result of two factors. One is increasing fragility with age. The second is that this cohort tends to be driving older cars with few of the recent safety protection advances in automotive engineering, such as 6 airbags, traction control, stability control, etc.; and
3. Older drivers do not take risks on the road. They allow ample time for the journey and tend to obey speed limits.

Based on evidence, NSA recommends a voluntary system of licence surrender, with the following safeguards:

ACT	NEW SOUTH WALES	QUEENSLAND	SOUTH AUSTRALIA	VICTORIA	WESTERN AUSTRALIA
23 Torrens St Braddon ACT 2612 PO Box 78 Deakin West ACT 2600 Ph: 02 6282 7677 Fax: 02 6282 7655	Level 10, 189 Kent St Sydney NSW 2000 GPO Box 9892 Sydney NSW 2001 Ph: 02 9251 6088 Fax: 02 9251 6755	Level 6, 243 Edward St Brisbane QLD 4000 GPO Box 1450 Brisbane QLD 4001 Ph: 07 3233 9191 Fax: 07 3229 0356	Level 6 185 Victoria Square Adelaide SA 5000 Ph: 08 8218 4811 Fax: 08 8218 4851	Level 4, 34 Queen St Melbourne VIC 3000 GPO Box 461 Melbourne VIC 3001 Ph: 03 9620 1311 Fax: 03 9620 1399	City West Lotteries House, 2 Delhi St West Perth WA 6005 Ph: 08 9420 7274 Fax: 08 9420 7276

### *1. Medical-based driver's license testing requests*

Any system needs to retain the ability of a medical practitioner to nominate a patient for a driving ability test, based on their assessment of either the patient's physical and mental functions, and/or the combination of drugs (prescription and OTC) that they are taking. A person's General Practitioner (GP) knows the patient's history, has the medical knowledge, and should initiate and refer accordingly.

The Monash University Accident Research Centre's study of Older Driver Behaviour (2009) mentions that night time driving is one of the functions that should be assessed with ageing. GPs should be aware of this and alert their patients as they see fit.

While some State Medical Associations claim they do not want this responsibility, NSA believes that this is part of a GP's duty to ensure their patient's welfare, and also that of their community.

### *2. Police-based driver's license testing requests*

Police should only request testing of an older person's driving ability if they have direct evidence that leads them to believe that an older driver has a problem. NSA has confidence that Tasmanian Police Officers are trained to recognise and handle vexatious complaints and are highly capable of taking appropriate action when they believe that someone is driving inappropriately.

NSA acknowledges that family member-based driver's license testing requests are also under consideration, and points out that, whilst accepted in some states, this is a difficult situation fraught with potential self-interest risks. NSA suggests that if the Tasmanian Government accepts requests from family members to refer their elders for assessment, the driver in question should also be required to have a report from their GP.

### *3. Testing Fairness / Right of Appeal*

Anecdotal evidence suggests that unfair testing regimes exist and NSA urges that these be rectified in the context of this Review. For example an older NSA member in Victoria, who had been driving only a manual gearbox for 50 years, was told to undergo a driving test. The tester then arrived in an automatic gearbox and would not allow the member to use a manual, a situation which led to the member failing the test. Maybe the member did have a general driving problem, but the testing circumstances did not allow for this to be detected. This was not a fair testing regime.

NSA strongly believes that there needs to be a right of appeal, especially for situations such as the one above which contain some ambiguity regarding the testing.

### *4. Older Driver Refresher Courses*

NSA believes there is a strong case for driver refreshment courses that could include elements of defensive driving, as well as information on new safety features in cars which may encourage older drivers to up-grade from their old vehicle.

Ideally, these courses should be financially supported by State governments. If the driver has to pay, an incentive to do so may be a reduction in insurance premiums. Alternatively, NSA

suggests the creation of an online interactive programme by DIER which refreshes driver knowledge, to be accessible from the "On Line Access Centre" in all Tasmanian regional centres, complemented by a hardcopy for those people without internet access. NSA supports the other educational ideas discussed in *Option 3.2* in the Discussion Paper.

#### *5. Voluntary License Surrender*

NSA believes that an important issue is missing from the Discussion Paper, namely access to adequate alternative public transport options, especially for people living away from Hobart and Launceston.

Whether the State has a mandatory testing system or a voluntary license surrender system, there have to be alternative transport options available to access the basics of a meaningful life such as health services, retail services, as well as maintaining connections to family and friends. As stated by the Tasmanian Government, this is an important aspect of its Social Inclusion Programme. However, if it is not adequately addressed, people will either continue to drive illegally or suffer isolation and deprivation.

To expand on any of the issues addressed in this letter, please do not hesitate to contact Peter Matwijiw, General Manager Research and Policy, on (02) 6230 4588 or [p.matwijiw@nationalseniors.com.au](mailto:p.matwijiw@nationalseniors.com.au).

Yours sincerely,



**Michael O'Neill**  
**Chief Executive**