

**Submission  
No 17**

## **DRIVER EDUCATION, TRAINING AND ROAD SAFETY**

**Name:** Mr Paul Versteege  
**Organisation:** Combined Pensioners & Superannuants Association of NSW Inc (CPSA)  
**Date Received:** 14/02/2017

## Submission to NSW Staysafe Committee

### Inquiry into *Driver Education, Training and Road Safety*

February 2017

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**Combined Pensioners & Superannuants Association of NSW Inc (CPSA)**

**Address:** Level 9, 28 Foveaux Street, Surry Hills NSW 2010 **ABN:** 11 244 559 772

**Phone:** (02) 9281 3588 **Country Callers:** 1800 451 488 **Facsimile:** (02) 9281 9716

**Email:** cpsa@cpsa.org.au **Website:** www.cpsa.org.au **Donations:** 1800 451 488

*CPSA is a non-profit, non-party-political membership association founded in 1931 which serves pensioners of all ages, superannuants and low-income retirees. CPSA has 108 branches and affiliated organisations with a combined membership of over 21,000 people living throughout NSW. CPSA's aim is to improve the standard of living and well-being of its members and constituents.*

## Summary

Despite data stretching back ten years saying otherwise, in 2016 the then NSW Roads Minister and the current NSW Police Assistant-Commissioner in charge of road traffic claimed that the risk of serious injury and death for older drivers is increasing. The truth is that the number of people over seventy in NSW is growing steadily, but that in proportion to that growth serious crash injuries have flatlined while road deaths are trending down.

The entirely fictional increasing risk of serious injury and death among older drivers is used as an argument in the defence of older driver road testing. NSW is the only jurisdiction in Australia where older drivers must periodically submit to a road test and risk losing their licence. In fact, NSW and the state of Illinois (USA) are the only jurisdictions left in the developed world where road testing of older drivers is still practised, despite overwhelming academic evidence that it does nothing for road safety.

***Recommendation 1:*** *That the NSW Government acknowledges that long term the proportion of crashes and road deaths involving older drivers is no cause for alarm.*

***Recommendation 2:*** *That the NSW Government dismantle the older driver licensing system in line with international and national evidence showing it produces no improvements in road safety in general or specifically for older drivers.*

***Recommendation 3:*** *That the NSW Government allocates significant funding to improve the safety and drivability of roads in regional NSW.*

## Submission

CPSA welcomes the opportunity to comment on the NSW Parliamentary Committee on Community Services inquiry into access to transport for seniors and disadvantaged people in rural and regional NSW. This submission responds to each the Inquiry's terms of reference. Where CPSA does not wish to comment, this is indicated by a 'nil response'.

### a) Trends in road safety research and crash statistics

In January 2016, the Daily Telegraph ran a story in which both the NSW Police Assistant-Commissioner for Road Traffic John Hartley and the then NSW Roads Minister Duncan Gay exhorted older drivers to review their need to drive. Both based themselves loosely on published statistics and appeared to define 'older driver' as someone over 70 (John Hartley) or over 65 (Duncan Gay).<sup>1</sup>

The *Road Traffic Casualty Crashes in New South Wales - Statistical Statement for the year ended 31 December 2015* published by Transport for NSW' Centre for Road Traffic presents information on the basis of which some might draw the conclusion that the trend for serious injuries among older drivers is steadily up.<sup>2</sup> While the final column (below) showing the total serious injuries among road users aged 70 and over, is not part of the Statement, the calculation is a simple and obvious one.

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<sup>1</sup> <http://www.dailytelegraph.com.au/news/nsw/top-traffic-cop-urges-seniors-to-get-off-the-roads/news-story/5f0fec7239a965732b612aea76f9fd8f>

<sup>2</sup> Table 2: Serious [crash] injuries (all hospitalisations), year, age

<b>Year</b>	<b>Serious injuries 70-79</b>	<b>Serious Injuries 80+</b>	<b>Serious Injuries All Ages</b>	<b>% of Serious Injuries 70+</b>
<b>2005</b>	566	444	11767	8.6%
<b>2006</b>	600	465	12459	8.5%
<b>2007</b>	648	500	11750	9.8%
<b>2008</b>	606	496	11372	9.7%
<b>2009</b>	570	534	11402	9.7%
<b>2010</b>	644	539	11449	10.3%
<b>2011</b>	666	558	11671	10.5%
<b>2012</b>	686	591	12252	10.4%
<b>2013</b>	714	655	12666	10.8%
<b>2014</b>	783	654	12420	11.6%
<b>2015</b>	773	642	12121	11.7%

As the table above shows, serious casualties among road users as a proportion of the total number of casualties were 8.6 per cent in 2005 increasing to 11.7 per cent in 2015, a significant increase.

However, viewing these numbers in the perspective of NSW population data<sup>3</sup>, a different picture emerges. As the table below shows, the proportion of serious injuries among those aged 70-and-over of the over-70s population cohort in any given year has been roughly the same over ten years.

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<sup>3</sup> Population data sourced from: 3101.0 - Australian Demographic Statistics, June 2016, Australian Bureau of Statistics.

<b>Year</b>	<b>NSW population 70+</b>	<b>Serious Injuries 70+</b>	<b>% of Serious Injuries 70+</b>
<b>2005</b>	644446	1010	0.16%
<b>2006</b>	652509	1065	0.16%
<b>2007</b>	667718	1148	0.17%
<b>2008</b>	681214	1102	0.16%
<b>2009</b>	695768	1104	0.16%
<b>2010</b>	713412	1183	0.17%
<b>2011</b>	731555	1224	0.17%
<b>2012</b>	749036	1277	0.17%
<b>2013</b>	768653	1369	0.18%
<b>2014</b>	793558	1437	0.18%
<b>2015</b>	818194	1415	0.17%

In fact, the injury rate calculated in this way is roughly the same as for those aged 70-and-under, as the table below shows.

<b>Year</b>	<b>NSW population UNDER 70</b>	<b>Serious Injuries UNDER 70</b>	<b>% of Serious Injuries UNDER 70</b>
<b>2005</b>	6129754	10757	0.18%
<b>2006</b>	6163591	11394	0.18%
<b>2007</b>	6220282	10602	0.17%
<b>2008</b>	6333686	10270	0.16%
<b>2009</b>	6438632	10298	0.16%
<b>2010</b>	6431588	10266	0.16%
<b>2011</b>	6479945	10447	0.16%
<b>2012</b>	6558064	10975	0.17%
<b>2013</b>	6640747	11297	0.17%
<b>2014</b>	6719842	10983	0.16%
<b>2015</b>	6802006	10706	0.16%

A similar picture emerges when road deaths are examined (see table below). After 2005, the 16.3 per cent rate of road deaths among over-70s over all-ages road deaths appears to be

seesawing before rising strongly in 2014 to 19.5 per cent. However, when road deaths for the over-70s are calculated as a percentage of the NSW population aged 70 and over, it becomes apparent that road deaths in this age group have been in a pronounced downtrend for a decade.

Year	Road deaths OVER 70	Road Deaths ALL AGES	OVER 70 Road deaths as % of ALL AGES Road deaths	NSW population OVER 70	OVER 70 Road deaths as % of OVER 70 NSW Population
2005	83	508	16.3%	644446	0.013%
2006	64	496	12.9%	652509	0.010%
2007	76	435	17.5%	667718	0.011%
2008	59	374	15.8%	681214	0.009%
2009	63	453	13.9%	695768	0.009%
2010	61	405	15.1%	713412	0.009%
2011	62	364	17.0%	731555	0.008%
2012	64	369	17.3%	749036	0.009%
2013	54	333	16.2%	768653	0.007%
2014	60	307	19.5%	793558	0.008%

Clearly, declaring that older drivers are inherently unsafe drivers is no different from declaring that women drivers are unsafe. It is blatantly discriminatory.

**Recommendation 1:** *That the NSW Government acknowledges that long term the proportion of crashes and road deaths involving older drivers is no cause for alarm.*

**b) Evaluating current driver training, including the effectiveness of refresher training and skills updating, and adaptation to changing vehicle technology**

Nil response.

**c) The needs of any particular driver groups**

Older drivers are needlessly discriminated against through mandatory on-road tests. As regional residents are largely car-dependent due to a shortage of alternative transport options, NSW's older driver licensing system constitutes a significant barrier to accessing transport. This system must be dismantled. NSW is one of the few jurisdictions worldwide that has a mandatory test for



older drivers. A practical driving test must be undertaken every two years from 85 onwards in order to retain an unrestricted license, with annual medical testing beginning from the age of 75. If a practical driving test is not undertaken a restricted or modified license is issued in which older NSW drivers are confined to driving within their local area. This typically imposes a 10 kilometre radius restriction from the driver's home. However, there is little to no evidence that more restrictive licensing policies have any impact on older driver crash involvement or casualty outcomes<sup>4</sup>. Following formal reviews, Queensland, Tasmania, Victoria and Western Australia have dismantled age-based licence restrictions, recognising that older drivers do not pose a major road safety threat and that compulsory testing does not improve road safety.

NSW's older driver licensing system is inherently contradictory. Medical testing from age 75 assumes that a medical diagnosis will detect unacceptable loss of driving ability, but that from age 85, when typically a person's health is less than when they were 75, the medical diagnosis apparently loses some of its power and needs to be supplemented with a road test. This is clearly not logical. The kindest interpretation of this policy is that the road test serves as a proxy medical test for cognitive disease, notably dementia. This approach appears to be testimony to the undying and deeply seated prejudice held by the NSW licensing authority and NSW Police that people over 85 have no business driving cars<sup>5</sup>.

The NSW Government justifies retaining the older driver licencing system on the basis that older people are disproportionately represented in crash statistics. However, this is a shallow interpretation of crash statistics, which does not account for the role of frailty bias and, as noted above, for the increase in the number of people over 70 living in NSW. Langford and Koppel state 'older adults' biomechanical tolerances to injury are lower than those of younger persons [...], primarily due to reductions in bone strength and fracture tolerance'<sup>6</sup>. This means that age-related frailty increases the chance of serious injury or death following a car accident.

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<sup>4</sup>Please see: Koppel, S. (2013) 'Effectiveness of age-based mandatory licensing assessments in reducing older driver crash risk' Available: <http://www.abc.net.au/cm/lb/5137342/data/effectiveness-of-age-based-mandatory-licensing-assessments-in-r-data.pdf>

<sup>5</sup> O'Rourke, J. 'Top traffic cop urges seniors to get off the roads' The Daily Telegraph [Sydney] 6 January 2016. Available: <http://www.dailytelegraph.com.au/news/nsw/top-traffic-cop-urges-seniors-to-get-off-the-roads/news-story/5f0fec7239a965732b612aea76f9fd8f> [Accessed 21/07/2016]

<sup>6</sup> P358: Langford, J. Koppel, S. (2006) 'The case for and against mandatory age-based assessment of older drivers' *Transportation Research Part F: Traffic Psychology and Behaviour*, 9(5), pp353-362

Older drivers tend to drive less annual kilometres compared with other age groups as they increasingly self-regulate<sup>7</sup>. Self-regulation involves the gradual reduction in driving distances, limiting driving at night, sticking to familiar routes and driving more slowly. Further, international research has shown that older driver crash involvement is primarily restricted to certain subgroups of older people (those with dementia, epilepsy or insulin treated diabetes, for example) rather than encompassing all older drivers<sup>8</sup>. This evidence suggests that health/medical-based assessments of driving capacity are likely to be more effective in reducing accidents than age-based assessments, as a person's health has a more tangible and direct impact on their driving skills.

With the proportion of the population over the age of 85 being projected to increase by 60% between 2010 and 2030, the number of older drivers is growing significantly. Thanks in large part to developments in medical science and public health policy, this new generation of older drivers is healthier, more active and more mobile than previous generations. Nonetheless, NSW's changing demography will have a significant effect on the cost of administering the older driver licensing system, which is yet to be proven effective. Accordingly, CPSA calls on the NSW Government to immediately dismantle this unfair and ineffective system.

It should also be noted that the NSW driver licensing authority has two mechanisms at its disposal to temporarily or permanently revoke a person's driver licence regardless of age. The first mechanism is based on the authority being notified by a qualified medical professional of a person's unfitness to drive due to a proscribed medical condition, including cognitive disease. The second mechanism is based on demerit points.

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<sup>7</sup> Molnar, L. Eby, D. (2006) 'The Relationship between Self-Regulation and Driving-Related Abilities in Older Drivers: An Exploratory Study' *Traffic Injury Prevention*, 9(4), pp314-319

Wong, I (2014) 'Sustaining safety and mobility amongst older adults: The Multilevel Older Person's Transportation and Road Safety Model' PhD thesis. Available: <https://eprints.qut.edu.au/70007/> [accessed 6 July 2016]

<sup>8</sup> Howell 1997 'Forward, perspectives and prospectives' in *Handbook of the human factors and the older adult* pp. 1-6, San Diego; Janke1994 *Age-related disabilities that may impair driving and their assessment: Literature Review*, Sacramento

Finally, driver licence revocation is a deeply traumatic experience for older drivers and is associated with a loss of independence and a diminished sense of identity<sup>9</sup>. As a result, the OECD has strongly recommended against age-based mandatory assessment programs such as that used in NSW citing that these programs have no demonstrable road safety benefits and contribute directly to a range of mobility, public health, and economic disadvantages<sup>10</sup>.

**Recommendation 2:** *That the NSW Government dismantle the older driver licensing system in line with international and national evidence showing it produces no improvements in road safety in general or specifically for older drivers.*

**d) The needs of driver trainers, both professional and non-professional**

Nil response.

**e) The needs of metropolitan, rural and regional drivers**

In 2015 CPSA surveyed members about their transport habits, with 59% of respondents living in a rural area or a major regional town and 72% reporting the Age Pension as their primary source of income<sup>11</sup>. 71% of respondents indicated that they would like to use more public transport, but cited significant physical barriers to doing so, including the accessibility of stations and public infrastructure surrounding stations plus the infrequency of services and timetable coordination. The Transport for NSW Disability Action Plan 2012-2017 indicates that in 2012, around 40% of TrainLink stations were wheelchair accessible, with a further 45% of stations providing assisted access<sup>12</sup>. However, it is difficult to find more detailed station-specific information. The accessibility of rural and regional bus stops is harder to gauge as proper accessibility depends on road and kerbside treatments, which come under the jurisdiction of local councils. Not only do accessible public transport stations support people with disability to use public transport, but also older people with mobility difficulties, parents with prams, and people with luggage or shopping

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<sup>9</sup> Whitehead, B. Howie, L. Lovell, R. (2006) 'Older people's experience of driver license cancellation: a phenomenological study'. Australian Occupational Therapy Journal, 53(3), pp173-180

<sup>10</sup> OECD (2001) 'Ageing and Transport: Mobility Needs and Safety Issues'. Available at [http://www.oecd-ilibrary.org/transport/ageing-and-transport\\_9789264195851-en](http://www.oecd-ilibrary.org/transport/ageing-and-transport_9789264195851-en) [accessed 11/07/2016]

<sup>11</sup> CPSA (2015) 'Transport Survey 2015' Available: [http://www.cpsa.org.au/files/Transport\\_Survey\\_2015.pdf](http://www.cpsa.org.au/files/Transport_Survey_2015.pdf)

<sup>12</sup> Transport for NSW 'Disability Action Plan 2012-2017' Available: <http://www.transport.nsw.gov.au/content/transport-nsw-disability-action-plan-2012-2017> [accessed 15 July 2016]

bags. It is critical that public transport users are able to access information about the accessibility of public transport infrastructure so that they can plan their journeys.

People living in regional areas are significantly more reliant on private car-based transport than their metropolitan counterparts due to a lack of alternatives in the form of public or community transport. At the same time, roads in regional NSW tend to vary in quality with a greater prevalence of unsealed and dirt roads, as well as hazardous roads and roadsides. Regional NSW residents are more likely to have to drive long distances, which increases the risk of driver fatigue. As a result, people living outside major cities are twice as likely to experience a serious road-related injury compared to city-dwellers<sup>13</sup>. Regional residents are at least three times more likely to die as the result of a transport accident<sup>14</sup>. On top of this, low income regional residents are more likely to be driving an older model car and less likely to prioritise repairs and maintenance, further increasing their risk of an accident<sup>15</sup>.

The significantly higher prevalence of injury and death on regional roads warrants immediate intervention from the NSW Government. In 2010, the Australian Rural Roads Group made a number of recommendations for cost-effective investments in rural road infrastructure that have been proven to improve safety outcomes for regional drivers:

- 'Treatments for roadside hazards in rural settings have been found to reduce pole and other fixed roadside casualty crashes by 68%
- 'Clearer road markings (which 'channel' vehicles safely at rural intersections) have been found to reduce casualty crash frequency by 36%
- 'Crash rates can be reduced by 20% for every one metre increase in bitumen seal width ('shoulder sealing') of an existing road

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<sup>13</sup> P24: Henley, G. Harrison, J. (2012) 'Trends in serious injury due to land transport accidents, Australia 2000-01 to 2008-09' Injury research and statistics series no. 66. Cat. No. INJCAT 142. Canberra: AIHW. Available:

<http://www.aihw.gov.au/WorkArea/DownloadAsset.aspx?id=10737421990>

<sup>14</sup> ABS (2011) 'Health outside major cities' Catalogue number 4102.0. Available:

<http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/4102.0Main+Features30Mar+2011>

<sup>15</sup> National Rural Health Alliance (2015) 'Submission to the Rural and Regional Affairs and Transport References Committee Inquiry into Aspects of Road Safety in Australia' Available:

<http://www.ruralhealth.org.au/document/submission-rural-and-regional-affairs-and-transport-references-committee-inquiry-aspects>

- 'Roundabouts at rural intersections can reduce casualty crash risks at intersections by 70-80%; when such crashes occur, the roundabout reduces the cost of accidents by around 90%.'<sup>16</sup>

As regional drivers rely on private car-based transport, CPSA welcomes the NSW Government's 2016-17 Budget allocation of \$50 million towards the Fixing Country Roads project and allocations for upgrades to major regional highways. CPSA calls on the NSW Government to continue this work through the allocation of funding in upcoming budgets.

**Recommendation 3:** *That the NSW Government allocates significant funding to improve the safety and drivability of roads in regional NSW.*

**f) The needs and expectations of passengers and other road users**

Nil response.

**g) The cost of driver training standards and how the costs should be allocated**

Nil response.

**h) The experience of other jurisdictions, and interstate cross-border issues**

Periodic road testing of older drivers is a rarity in the developed world. In the USA, the state of Illinois is the only state that still road tests seniors. Japan, Korea, Canada and Western-European countries (including the UK) do not road-test on the basis of age.

In Australia, all states and territories except New South Wales have accepted the evidence that the road testing (and licence cancellation upon failing the test) of seniors has no positive or negative effect on road safety.

**i) Other related matters**

Nil response.

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<sup>16</sup>P16: Australian Rural Roads Group (2010) 'Going Nowhere: the rural local road crisis, its national significance and proposed reforms' Prepared by Juturna Consulting on behalf of Australian Rural Roads Group. Available: [http://infrastructureaustralia.gov.au/policy-publications/publications/files/Australian\\_Rural\\_Roads\\_Group\\_Report.pdf](http://infrastructureaustralia.gov.au/policy-publications/publications/files/Australian_Rural_Roads_Group_Report.pdf)