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Hon Ms Anastacia Palaszczuk MP  
Minister for Transport and Multicultural Affairs  
GPO Box 2644  
Brisbane QLD 4001

Dear Minister,

**Re: Submission to the Queensland Older Drivers Safety Advisory Committee's Review of Older Driver Safety**

National Seniors Australia (NSA) welcomes the opportunity to submit comments to the Queensland Older Drivers Safety Advisory Committee's Review on 'Older Driver Safety, crash involvement and current approaches being undertaken in Queensland, other states and internationally'.

By way of background, with a quarter of a million members Australia wide, and about 86,000 in Queensland alone, NSA is the largest organisation representing the views of Australians aged 50 and over. NSA operates for the social and economic benefit of its members and represents the interests of older Australians in a broad range of community, business and government forums.

NSA advocates, where possible, for the elimination of age limits and age-based thresholds, recognising that people's age may not necessarily be reflective of their capabilities. Subsequently, NSA believes there is no one answer to the questions of 'how old is too old to drive', and that any assessment system of driving skills needs to be based on ability rather than age, particularly as the latter introduces elements of age discrimination.

According to Queensland Transport (2008), it is estimated that the number of Queenslanders aged over 60 will increase by 75% by the year 2021. Recent research evidence, including statistics from jurisdictions both with and without mandatory testing of older drivers indicate that older drivers are no more of a risk on the road than any other age group. Studies of driving behaviour conducted by the Roads and Traffic Authority for example have actually shown that the fatality rate for 21-24 year olds is much higher than in older age groups. Older drivers (70+) make up 8% of the population and 13% of all fatalities, whereas younger drivers (<26) make up 15% of the population and 36% of all fatalities.

Despite older people being less likely to be involved in an accident, if they are, it is more likely that they are severely injured or die as a direct result of two factors. First, an increasing level of physical frailty as people age and second the fact that this group tends to drive older cars with fewer of the recent safety protection advances in engineering, air bags, traction control, stability control etc.

Research shows that older drivers generally have a good understanding of how ageing affects their ability to drive safely. People tend to notice that their reaction time or attention span is decreasing and adjust their driving habits accordingly, thereby reducing their own and others' risk (Queensland Transport, *Queensland Road Safety Action Plan 2008-2009: safe4life*, 2008).

The current system in Queensland requires that a driver aged 75 and over must:

- Hold a valid medical certificate at all times;
- Report to the Department of Transport and Main Roads any long term or permanent medical condition that affects their ability to drive safely as soon as the medical condition develops or changes;

Against this background and based on the evidence available, NSA recommends a voluntary system of licence surrender, with the following safe guards:

#### *Medical based driver's licence testing*

The general practitioner (GP) system of assessment and referral needs to be retained. The GP is able to determine an older driver's health risk factors based on an assessment of their physical and cognitive abilities, as well as the range and combination of drugs they are taking. The GP knows the patient's medical history and based on this evidence may recommend maintaining the present driving status, placing a restriction on driving time and distances, make a referral to a reputable driving association such as the RACQ for a driving assessment based on skills and knowledge, participate in the RACQ *Years Ahead Program*, or complete the appropriate documentation to the police department to have the person's licence suspended.

The Monash University Accident Research Centre's 2009 study of older driver's behaviour indicated 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 if necessary. Medical standards for driving are detailed in the National Transport Commission's 2003 publication *Assessing fitness to Drive*.

However, not all GPs agree that they have a responsibility to the patient, his/her family and the community to recommend that the older person should restrict or forfeit their license when becoming physically or cognitively frail. NSA believes that this is part of a GP's duty of care, and is an area that could be strengthened with education.

#### *Older Drivers safety and crash involvement*

Survey findings in Australia and overseas vary but in general terms it has been found that:

- lower mileage drivers of any age have a higher crash rate than drivers with higher mileages;
- once different driving distances are taken into consideration, older drivers as a group are at least as safe as other age groups;
- for older drivers, the low mileage/high crash association is more likely attributable to reduced fitness to drive than to higher levels of urban driving.

Studies comparing different licensing procedures, i.e. non age-based mandatory system with a medical / road assessment system, using per population, per driver , per distance and per time spent driving indicators do not show any road safety benefits associated with mandatory licensing.

#### *Police based driver's licence testing requests*

Police should only request testing of an older person's driving ability if they have direct evidence which leads them to believe that an older driver is having a problem or creating a problem for other drivers on the roads.

A family member can request that an older person with a medical condition that may impair the person's ability to drive safely, be assessed by their GP with a view to having the licence restricted or rescinded (Jets Law 2006). This may, however, lead to potential self interest on behalf of family or friends. Police in some instances may request a medical assessment from the person's GP. Ultimately the decision to place restrictions on the older driver is a medical decision.

#### *Older Driver Refresher Courses*

NSA believes there is a strong case for refresher courses which 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.

Older drivers should be encouraged to attend courses facilitated by Queensland Transport where the older driver can be brought up to date on changes to road rules and how to assess personal fitness to drive. Such courses could be run annually in urban and regional locations. Older drivers could be advised when such courses were available. RACQ already operates the RACQ *Years Ahead Program* as well as an online personal assessment test for older drivers.

Ideally, these courses should be financially subsidised by the State government. However, if a driver has to pay, there should be some financial incentive such as a reduction in insurance premiums. Alternatively, older persons with access to the internet could update their knowledge on changes to road rules with suitable on-line interactive programs for the older driver.

#### *Alternative Transport Options*

An important issue that cannot be excluded is the availability of community transport for drivers who voluntarily or otherwise give up their licenses. Older drivers in both urban and regional communities need to have access to health and retail services, as well as maintain connections with family and community events. It is vital that older people are able to participate in the workforce and the community to the degree they wish, as social isolation can have serious mental health implications. Social isolation is an issue disproportionately affecting older people, and may further increase when the older driver's licence is suspended or forfeited.

#### *Personal Identification*

Public transport is generally inadequate or not well-placed for an older person to access, and taxi services, despite the provision of taxi vouchers to eligible people, can be unaffordable for person on a fixed income. Drivers' licences are also used for personal identification when doing business, if removed a similar identity card should be provided at a similar or reduced cost.

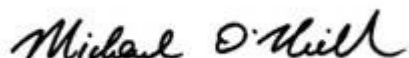
National Seniors further believes that drivers of all ages would benefit from nationally consistent standards relating to road rules, clear line markings, parking provisions and signage.

### **Recommendations**

- Mandatory testing of older drivers should not be introduced.
- The existing system in Queensland should remain with minor changes.
- Older drivers should have access to driver training courses and interactive on-line programs that include current road rules and a personal skills assessment.

To expand on any of the issues raised in this submission, please do not hesitate to contact Ms Vera Somerwil, Chair of the Queensland Policy Advisory Group on (07) 3221 2977 or [veronicasomerwil@bigpond.com](mailto:veronicasomerwil@bigpond.com).

Yours sincerely

A handwritten signature in black ink that reads "Michael O'Neill". The signature is written in a cursive, flowing style.

**Michael O' Neill**  
Chief Executive