



# Road Traffic Management Corporation

## **Driving Licence Card Validity Period Review**

May 2022



**'Safe roads in South Africa'**

The Road Traffic Management Corporation (RTMC) is an Agency of the Department of Transport (DoT) and a Member of the United Nations Road Safety Collaboration

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## Abbreviations and Terminology

Acronym / Abbreviation	Description
AAMVA	American Association of Motor Vehicle Administrators
DG	Director General
DoT	Department of Transport
DPSA	Department of Public Service and Administration
DVLA	Driver and Vehicle Licensing Authority
DLCA	Driving Licence Card Account Entity
DLTC	Driving Licence Test Centre
DTC	Driver Technical Committee
EEA	European Economic Area
EC	European Commission
ECMT	European Conference of Ministers of Transport
EU	European Union
FOSAD	Forum of South African Directors General
GDL	Graduated Driving Licensing
GDP	Gross Domestic Product
GNP	Gross National Product
HDI	United Nations Human Development Index
HPCSA	Health Professionals Council of South Africa
ID	Identification
ISO	International Organisation for Standardization
LCU	Live Capture Units
LEU	Live Enrolment Units
mDL	Mobile driving licence
n.d.	No Date
MSDS	Minimum Service Delivery Standard
NaTIS	National Traffic Information System
OECD	Organisation for Economic Co-operation and Development
<b>OUTA</b>	Organisation Undoing Tax Abuse
PrDP	Professional Driving Permit
PVC	Polyvinyl carbonate
RTC	Road Traffic Crash The term 'road traffic crash' with its acronym 'RTC' is intentionally aligned with the definition as in SANS/ISO 39001 and is used throughout this report. 'Road Traffic Crash' imparts the same meaning as "accident" noted in the National Road Traffic Act, Act 93 of 1996.

Acronym / Abbreviation	Description
RTI	Road Traffic Inspectorate
RTMC	Road Traffic Management Corporation
SADC	South African Development Community
TDL	Transport Driving Licence
TRL	Transport Research Laboratory
TSM	Transportation System Management
UK	United Kingdom
UN	United Nations
WHO	World Health Organisation

# Executive Summary

The main contributory factor in the average annual fatal road crashes over the past decade is by far human behaviour related with a contribution of an estimated 90% of all fatal crashes where +12,000 fatalities were recorded on average over the past few years and key to the behaviour of drivers are the training and education provided when novice drivers obtain their learners and drivers licences.

The last South African driving licence review was conducted more than fifteen years ago by the National Department of Transport (DoT) in 2005; a review of the South African Driving licence system is needed to ascertain if the system is in line with international best practices within the South African context.

The scope of the assignment entailed a desktop review to determine best international practice driving Licence Card validity period in the South African context, including recommendations for further related research within the South African context, as well as proposed way forward within the South African context.

The literature review indicated that benchmarking countries have made great strides in improving the driving licence renewal process. The validity period of the driving licence cards in the benchmarking countries varies between 10 and 15 years. The longer validity periods allow for less pressure on the system in terms of the renewal process. In addition, there is a distinction made between the validity periods of different categories of vehicles and licences which can allow for personal drivers to have an independent renewal process that does not interfere with professional drivers. Most of the heavy vehicle driving licence cards have a 5-year validity period.

Although the age limits on validity are country specific, the process for driving licence renewal for most of the countries calls for the provision of medical certificates to prove fitness to drive, though there is little mention of eye tests. Most of the benchmarking countries have a minimum driving age of 17 and 18 years, which is consistent with most countries as the minimum age for obtaining a driving licence.

The most common material that is used to produce the driving licence document in the benchmarking is polycarbonate. This material can be attributed to the durability and security features of the document. However, there is room to improve the accuracy of the above conclusions by conducting extensive research which will include more than 27 countries.

Driving licence card renewals in 40 countries were analysed, i.e., 20 countries with a road safety ratio (deaths per 100 000 population) better than South Africa and 20 countries that had a worse road safety rating (deaths per 100 000 population) than South Africa (WHO, 2018). The validity period in the 40 countries range from 1-20 years with an average of 6,8 years. The countries ranked above South Africa according to the WHO have an average driving licence card validity period of 9,3 years and countries ranked lower than South Africa averaging 4.4 years.

It needs to be highlighted that many of the poorer road safety ranked countries are still using paper-based driving licences which would explain the lower average validity period in these countries. The average driving licence card validity period of almost 10 years in more developed countries, with better road safety ratios highly motivate and validates a longer renewal period in line with international best practice.

Based on the literature review and the comparative analysis the following are recommended:

- ▶ New driving licences for codes A, A1, B and EB licences to be issued for a period of 8 years instead of 5 years;
- ▶ Provide for transitional provisions to accommodate existing cards
- ▶ For PrDP's to remain valid for a 2 year period
- ▶ Replace the current laminated paper driving licence card type in South Africa with a polycarbonate type driving licence that will better support the 10-year duration for driving licence cards in South Africa

In line with the above, Regulation amendment is proposed and attached in the Annexures to the report.

Recommendation for future research is made on:

- ▶ Progressive Driving Licence
- ▶ Learner's Licence Test
- ▶ Driving licence codes
- ▶ Electronic driving licences
- ▶ Age Limits and Eye Testing
- ▶ Socio and Economic Conditions



# 1 Introduction

## 1.1 Purpose of the Study

The main contributory factor in the average annual fatal road crashes over the past decade is by far human behaviour related with a contribution of an estimated 90% of all fatal crashes where +12,000 fatalities were recorded on average over the past few years and key to the behaviour of drivers are the training and education provided when novice drivers obtain their learners and drivers licences.

The last South African driving licence review was conducted more than fifteen years ago by the National Department of transport (DoT) in 2005; a review of the South African Driving licence system is needed to ascertain if the system is in line with international best practices within the South African context.

## 1.2 Background

On 3 September 1993 amendments to the United Nations 1968 Vienna Convention on Road Traffic entered into force, which guided the implementation of the new driving licence system in South Africa. The last major review of the South African driving licence and system was done during 1995 with the key concepts highlighted in Government Gazette 16486 of 23 June 1995.

This review included the rationalisation of the many driving licence codes, and harmonisation in line with the 1968 United Nation Vienna Convention on Road Traffic, and the South African Development Community (SADC) requirements at the time. Other concepts discussed included the format, layout and security features of the driving licence card, renewal of the driving licence card and the validity period of the driving licence card based on the durability of the material used and the harshness of the environment. It also briefly discusses the conversion of the previous Public Driving Permit to a Professional Driving Permit (PrDP) system.

Furthermore, it also focused on reducing the cost of production of the driving licence card, through volume-based production and the centralisation of the driving licence card production due to security reasons.

The resultant driving licence card in a laminated paper format was implemented from 1 March 1998 almost 24 years ago. An initial five-year period was implemented in a phased approach to convert from the previous identity book format driving licence and the other coupon type driving licences.

The end of the second card production period for the card production facility coupled with further amendments of the UN convention that was due to entered into force on 28 March 2006, necessitated a review of the driving licence system during 2005. Moreover, attention had to be given to the driving card production system that was nearing its scheduled replacement in 2009. However, even though the card production machine was 11 years in production at the time, it has not been replaced during this time.

During 2011 the further changes to the UN convention were implemented that related to changes to the driving licence coding system. Further provision was made to split heavy motor vehicles and bus licences, changing the way reference is made to combination vehicles and catering for specific pictograms to identify the types of vehicles. These pictograms may not be used for indicating any other vehicle other than what is defined by Annexure 6 of the UN convention, which South Africa is using.

At the same time the development of a Minimum Service Delivery Standard (MSDS) originated in 2011 with the Forum of South African Directors'-General (FOSAD) plan for improving service delivery through changing the way government works. The Department of Transport was identified as one of the State Departments in the project.

The Department worked with the DPSA on the implementation of the Delivery agreement for outcomes 12: "An efficient, effective and development oriented public service and an empowered, fair, and inclusive citizenship.

One of the initiatives of this process was to identify ways to shorten queues at the licensing service centres. The Department explored online transactions and bringing South Africa in line with international best practice by proposing legislation to extend the validity period of the driving licence card to 10 years. The initial fears that the durability of the card would be a problem was also laid to rest as most driving licence cards were still in a pristine condition when it is renewed.

As far back as June 2012 the extension of the validity period for the driving licence card was discussed at the Driver Technical Committee (DTC) and the Legislation Forums, to reduce the demand and the number of times a driver must return for the renewal of the driving licence card.

Legislation was amended on 19 November 2013 with the publication of Government Gazette 37048 that amended Regulation 108 (5) (a) to extend the validity period of a driving licence card to 10 years, depending on a date to be determined by the Minister. However, the date was never published, and this legislation was not put into operation at the time.

Regulation 108 was amended again on 31 October 2014 with the publication of Government Gazette 38142. Some arguments have been placed forward that this in effect reverted the proposed 10-year validity period back to 5 years. This was in fact not the intention. The amendment in Government Gazette 38142 could not refer to a 10-year validity period as this was not yet in force. The new intention of the proposed amendment was to bring in Regulation 108A and could further only refer to the validity.

Comments at the time also addressed complication with regards to the Professional Driving Permit (PrDP). The PrDP is valid for 2 years and need to be renewed twice in the current 5-year period.

Since 2018, the Department has tabled with the Driving Licence Card Account Entity (DLCA) major challenges regarding the Live Capture Units (LCUs) but more especially with the Live Enrolment Units (LEUs) that replaced the LCUs and that are not working properly. The LCU and LEU refers to the equipment used to record a driver's photograph, signature, and fingerprints upon application of a learner's licence, driving licence, Professional Driving Permit (PrDP and TDL (including the renewals that may apply)). The contract with the service provider for LEUs has since ended without the problems being addressed. The LEU will be replaced by the Smart Enrolment Solution.

With the world-wide outbreak of COVID-19 pandemic during 2019-2022 most card production ceased for the initial lock down period but as the lockdown levels fluctuated, limited services could slowly start again. The COVID-19 pandemic had negative impact on production world-wide which caused shortage of certain computer and manufacturing material. During October 2021 the driving licence card machine broke down resulting in major delays in producing driving licence cards. Replacement parts for this type of machine is scarce and parts had to be sent to Germany to be repaired.

Public outcry and demands from other organisations called for the increase of the expiry period of driving licence cards to 10 years. Justice Project SA reminded the Department on a previous occasion that the legislation is already in place to amend the validity period to 10 years. This will reduce the number of times a person needs to return to a DLTC to renew a driving licence, reduce the opportunities for exploitation in long queues and the reduction in number of cards to be produced will ease the demand of the production of driving licence cards.

On 20 January 2022 card production machine returned to production again. However, with the large backlog it will take months to catch up. The production schedule was increased which open risk that the card production machine now already 24 years old will fail gain. The Organisation Undoing Tax Abuse (OUTA) proposed a driving licence a renewal period of 10 years to alleviate the backlog.

The Minister tasked the Road Traffic Management Corporation (RTMC) to conduct research to provide scientific evidence on the subject matter in the South African context. (Media statement, 3 February 2022 "In looking at the various interventions to improve the driving licence value chain, we are also looking at the validity period of the driving licence card. Further to this the minister indicated that South African driving licences "will be on par with the developed world".

## 1.3 Scope of the Project

The scope of the assignment entailed a desktop review to determine best international practice driving Licence Card validity period in the South African context, including recommendations for further related research within the South African context, as well as proposed way forward within the South African context.

## 1.4 Report Details and Sections

The Report consists of 7 chapters with sections of the previously concluded literature review incorporated throughout to provide technical substance and terminology needed to contextualise further analysis and discussion.

# 2 Literature Review

Driving licences in South Africa are official documents allowing the holder to legally operate a vehicle on public roads. Licences are issued by authorized driving licence testing centres run by municipalities under the supervision of the provincial and national Departments of Transportation. The following chapter will explore the literature of the systems used to facilitate the driving licences, the renewal processes as well as the assessments used to obtain and grant the licence to deserving candidates, etc. Furthermore, the chapter will interrogate the validity period of the issued licence in addition to how the document has changed overtime and the coding system used for the authorization of different vehicle classes.

## 2.1 Driving Licensing System

A driving licence can be defined as the essential resultant document that signifies and proofs that a person has undergone training and has demonstrated during a theoretical and practical driving licence test that that person has the necessary skill, knowledge to operate a vehicle of a certain category. The driving licence system in this part pertains to the testing of a driver, the issuing of the driving licence, the driving licence categories, and the driving licence type. This further includes the renewal of the driving licence.

The Minister of Transport has tasked the Road Traffic Management Corporation (RTMC) to research the driving licences of South Africa and compare with the developed world to set it on par with the developed world.

It is therefore prudent to establish which countries are part of the developed world. The World Bank defines a developed country as a sovereign state that has high quality of life, developed economy and advance technological infrastructure relative to other less industrialised nations. The degree of gross domestic product (GDP), gross national product (GNP), the per capita income, level of industrialisation, and the widespread infrastructure availability and the general standard of living criteria are used in determining this criterion.

However, the United Nations Human Development Index (HDI) is regarded as a more encompassing measure to indicate the classification of a country developed or developing status. The HDI is annually updated to reflect the development status of all countries. Any country with a score higher than 0.80 or higher is classified as a developed country and a score lower than that a country is classified as still a developing country.

The table below lists the 64 developed countries according to the HDI 2020 report.

**Table 1:** HDI 2020 Developed Country List (source UN:2020 HDI)

Country Rating	Country	HDI Index
1	Norway	0.957
2	Ireland	0.955
2	Switzerland	0.955
4	Hong Kong, China (SAR)	0.949
4	Iceland	0.949
6	Germany	0.947
7	Sweden	0.945
8	Australia	0.944
8	Netherlands	0.944
10	Denmark	0.940
11	Finland	0.938
11	Singapore	0.938
13	United Kingdom	0.932
14	Belgium	0.931
14	New Zealand	0.931
16	Canada	0.929
17	United States	0.926
18	Austria	0.922
19	Israel	0.919
19	Japan	0.919
19	Liechtenstein	0.919
22	Slovenia	0.917
23	Korea (Republic of)	0.916
23	Luxembourg	0.916
25	Spain	0.904
26	France	0.901
27	Czechia	0.900
28	Malta	0.895
29	Estonia	0.892
29	Italy	0.892
31	United Arab Emirates	0.890
32	Greece	0.888
33	Cyprus	0.887
34	Lithuania	0.882
35	Poland	0.880
36	Andorra	0.868
37	Latvia	0.866
38	Portugal	0.864
39	Slovakia	0.860
40	Hungary	0.854
40	Saudi Arabia	0.854
42	Bahrain	0.852
43	Chile	0.851
43	Croatia	0.851
45	Qatar	0.848
46	Argentina	0.845

Country Rating	Country	HDI Index
47	Brunei Darussalam	0.838
48	Montenegro	0.829
49	Romania	0.828
50	Palau	0.826
51	Kazakhstan	0.825
52	Russian Federation	0.824
53	Belarus	0.823
54	Turkey	0.820
55	Uruguay	0.817
56	Bulgaria	0.816
57	Panama	0.815
58	Bahamas	0.814
60	Oman	0.813
61	Georgia	0.812
62	Costa Rica	0.810
62	Malaysia	0.810
64	Kuwait	0.806
64	Serbia	0.806

These developed countries form the basis for comparison with the South African driver licence system, as far as information about the driving licence of these countries are available.

The European Union (EU) consist of the 27 countries (United Kingdom Government, n.d.) listed in Table 2, all of which are classified as developed countries:

**Table 2:** List of 27 European Union Countries

EU benchmark Countries		
Austria	France	Malta
Belgium	Germany	Netherlands
Bulgaria	Greece	Poland
Croatia	Hungary	Portugal
Republic of Cyprus	Ireland	Romania
Czech Republic	Italy	Slovakia
Denmark	Latvia	Slovenia
Estonia	Lithuania	Spain
Finland	Luxembourg	Sweden

The European Economic Area (EEA) consist of the 27 EU countries as well as the three countries Iceland, Liechtenstein, and Norway all of which are also part of the developed countries (Eurostat. n.d.; United Kingdom Government, n.d.). The EEA therefore comprises 47% of the developed countries listed in Table1.

The EU countries in line with the directive 2006/126/EC of the European parliament and of the council of 20 December 2006 on driving licences all EU members states (European Union. 2006) implemented the same driver licensing system (European Commission. No date) since 19 January 2013, driving licence layout and type and the administrative validity period is mostly 10 years for light motor vehicles and motorcycles.

## 2.1.1 Driving Licence Test

According to the EU the member states must ensure that applicants for driving licences have the required knowledge and skills and demonstrate the behaviour for operating a motor vehicle. This are to be assessed through a theory test and a test of skills and behaviour (EU, 2006:38–45).

The United Kingdom Driver and Vehicle Standards Agency (2010) mentions the systematic approach to follow when driving such as Mirrors, Signal, Manoeuvre – Position, Speed, Look (MSM-PSL)". South Africa follows a very similar system namely the system of vehicle control, also known as the defensive driving approach which is also a systematic approach (South African Department of Transport. 1992). The system of vehicle control is as follow:

- ▶ Search;
- ▶ Identify;
- ▶ Predict;
- ▶ Decide;
- ▶ Mirror check;
- ▶ Blindspot check;
- ▶ Signal;
- ▶ Mirror check;
- ▶ Brake;
- ▶ Appropriate gear selection;
- ▶ Blindspot check;
- ▶ Steer, and
- ▶ Accelerate.

This system of vehicle control is enshrined in the various modules (manoeuvres) of the South Africa K53 Practical driving test for motor vehicle drivers (South African Department of Transport, 2005).

Annex II of the EU Journal prescribes the minimum requirements for driving licence tests, to be a theory test and test of skill and behaviour. The theory test must ensure that the applicant has the require knowledge of the following:

- ▶ Road Traffic Regulations (road signs, markings and signals, rights of way and speed limits.
- ▶ Drivers importance of alertness and attitude to other road users; and
- ▶ Perception, judgement and decision-taking, reaction time, changes in driver behaviour due to influence of alcohol, drugs, medical products, state of mind and driver fatigue.

These are part of most learner licence training material in South Africa, and the department of Transport's driver training guide. The test might not necessarily include all these factors all the time.

### Progressive Driving Licence

In South Africa a learner's licence with a validity period of 24 months may be obtained at the age of 16 for light motorcycles with an engine capacity not exceeding 125 cubic centimetres, and light motor vehicles only at the age of 17 years and all other motor vehicles at the age of 18 years. Except for the motorcycle learner's licence (code A1) all other learner's licences requires supervised driving by an already licenced person for that vehicle class. A learner driver may then apply to be tested for a driving licence once the learner reaches the age of 18 years.

In the Australia, New Zealand, and US a Graduated Driver Licensing (GDL) program has been implemented that allow young drivers to gain 6 months supervised driving experience before then being allowed to obtain a provisional driving licence with restricted unsupervised driving privileges (Governors Highway Safety Association (n.d.); New Zealand Ministry of Transport, 2020).

The Governors Highway Safety Association (n.d.) indicate that the GDL program, is a program that allow young drivers to safely gain driving experience before then being allowed to obtain a driving licence with all driving privileges. Most of these GDL programs is a three-stage approach where:

- ▶ Learner Stage: supervised driving, cumulating with a driving test (minimum age 16 years);
- ▶ Intermediate/Provisional Stage: limiting unsupervised driving in high-risk situations (minimum age 16 years and 6 months); and
- ▶ Full Privilege Stage: a standard driving licence (minimum age 18 years).

The GDL system also includes some form of progressive licensing system where the young driver may only progress to a higher vehicle class learner's licence once obtaining a full licence for a lower class before being allowed to apply for a licence for a higher class.

Article 6 of the EU (2006) provides for the issuing of driving licences in a progressive manner with the driving licence for categories C1, C, D1 and D that are issued only to drivers already entitled to drive vehicles in category B. Driving licences for categories BE, C1E, CE, D1E and DE shall be issued only to drivers already entitled to drive vehicles in categories B, C1, C, D1 and D respectively. The EU also employs an elaborate driver licensing system for motorcycles that begins with a moped AM at minimum age 16, then A1 and A2 before a person may obtain a code A motorcycle at minimum age of 21 years.

Most of the GDL are focused on reducing vehicle crash statistics of young or novice drivers. Unfortunately, the vehicle crash statistics in South Africa are not frequently and thoroughly analysed to determine whether the progressive code B, light motor vehicle is required or will have any impact on the vehicle crash statistics.

## 2.1.2 Driving Licence Renewal

The EU directive (2006:24) under Article 7 highlights that when a driving licence is renewed, when the administrative validity expires member states must ensure that the driver continue to comply with the minimum standards of physical and mental fitness for driving set out in Annexure III of the directive for driving licence in heavy motor vehicle and bus categories (e.g., C, CE, C1, C1E, D, DE, D1, D1E).

However, for the driving licence in motorcycle and light motor vehicle categories (e.g., AM, A, A1, A2, B, B1 and BE) member states may require an examination to access compliance with the minimum standards of physical and mental fitness for driving set out in Annex III but is not required.

The EU directive (2006:25) indicates that member states may limit the period of administrative validity of individual driving licences for any category in case it is found necessary to apply an increased frequency of medical checks or other specific measures such as restrictions for traffic offenders.

Member states may further reduce the administrative validity period of a driving licence for drivers that reached the age of 50 years to apply an increased frequency of medical checks (eye tests). It is important to note that the reduced period of administrative validity can only be applied upon the driver renewing the driving licence. However, it does not seem to have been implemented by any of the member states.

### Eye Test

The Waka Kotahi New Zealand Transport Agency (n.d) highlight the importance of good vision as essential to the safe driving of a vehicle. Eyesight must be tested when applying for a new licence class, renewal of a licence, reinstating a licence after disqualification or suspension or converting a foreign licence and can be done via certification by an optometrist or by screening at the driving licensing agency. The driving licence validity period is set to 10 years in New Zealand (New Zealand Ministry of Transport, 2020) and therefore drivers are only required to be submitted every 10 years for an eyesight. Except for Australia that also allow for an eye test to be done at the testing facility, the trend in the EU, Australia, New Zealand, UK and US is to have the eye test done by a professional optometrist and the certificate must be attached to the new or renewal application.

In the case of South Africa, it is understood that the National Department of Transport, the RTMC and all Provincial stakeholders have developed a roadmap that will see many services being developed and delivered via an online platform. To this end, the renewal of a driving licence and an application of a

professional driving permit are seen as ideal candidates to pursue the realisation of a fully online solution as an addition to the existing physical driving licence testing centres (DLTC).

To deliver the applications via an online platform, some changes to the legislation must be made. It is envisioned that the legislation changes can be made in parallel with the system developments to have the online solution deployed as soon as possible.

The RTMC, as directed by the Minister of Transport have engaged with the Health Professions Council of South Africa (HPCSA) to deliver the following elements, which are required to produce a driving licence card and an application for a PrDP, via an integrated platform.

- ▶ The testing of an applicant's visual acuity is a critical requirement not only in terms of legislation, but as a fundamental mechanism to facilitate road-safety.
- ▶ Currently, it is legislated that an examiner of driving licences is mandated to satisfy him/herself of the applicant's visual acuity in terms of the required standard.
- ▶ Technical committees within the road traffic environment holds a view that the visual acuity requirement can be accommodated through other means and conducted by general staff within the DLTCs, given that the enrollment units within the DLTCs holds the eye testing mechanism within its design and can merely be operated by any person with proper training and not having to be qualified as an examiner of driving licences.
- ▶ The technical committee in addition, sees more value in trained and qualified professionals such as Optometrists or Ophthalmologists testing the visual acuity of an applicant. They have sanctioned the pursuit of solutions and engagements through an integrated means.
- ▶ Given the above-mentioned point, the RTMC intends to develop a platform which will allow approved and registered Optometrists and Ophthalmologists to record the visual acuity of an applicant via an online web-service, which will be imbedded within the National Traffic Information System (NaTIS). The aforementioned will be subject to a strict registration, verification and authorization mechanism as part of the integration with the HPCSA.
- ▶ In this regard the NaTIS, when an application for the renewal of a Driving Licence card or PrDP is made, will merely check the result and validity of the test and proceed with application as per the regulatory provisions. For example, that the applicant must operate a vehicle with spectacles.

The online recording of an eye test result will not only pave the way for a fully online application solution for the renewal of a driving licence card and an application for a PrDP but will also deal with a serious problem of fraud and corruption. Investigations have revealed that criminal elements charge for the issuing of fake eye test certificates at or near DLTCs.

### 2.1.3 Professional Driving Permit

South Africa regulates that certain driver must in addition to the driving licence hold a professional driving permit (PrDP) for transporting passengers, goods, or dangerous goods. In the case of an application for a category 'P' passenger and 'D' dangerous goods PrDP, the applicant is of the minimum age of 21 years and 25 years, respectively. A person may obtain a driving licence for categories C1, C, EC1 or EC at the age of 18 but must apply for a category G – Goods PrDP to drive this type of vehicle or alternatively just use the licence for light motor vehicles.

Furthermore, an applicant wanting to obtain a dangerous goods PrDP must have not more than six months prior to the application obtained a training certificate on loading and offloading of dangerous goods and the general conduct when transporting these dangerous goods. A PrDP is only valid for a period of two years.

It should be noted that article 41 of the UN Convention of Road Traffic, Vienna 1968 indicates that contracting parties may refuse to recognize the validity a driving licence of classification C, D, CE, and DE referred to in Annexes 6 if held by a person under the age of 21 years (United Nations, 1968:38).

The EU does not seem to specifically provide for a commercial licence or professional driving permit. Each licence category is reflected separately on the driving licence card with an expiry date. The validity



period for driving licences in heavy goods vehicle categories C, CE, C1, C1E and buses with category D, DE, D1, D1E is set to 5 years (European Union, 2006:11).

New Zealand requires a commercial driving licence for a small or large passenger vehicle endorsement to be subjected to police vetting report, certificate of knowledge of law and practice for a goods service or passenger vehicle. The applicant can decide whether to have a one year or a five-year commercial driving licence period, depending on the fee payable.

The requirement is that an applicant must hold a code 1 (light motor vehicle licence) for at least two years (Waka Kotahi New Zealand Transport Agency, n.d. b and c). This minimum of two-years code 1 licence and police vetting report is not applicable to a commercial goods endorsement.

The police vetting report is required to ensure people are safe when using the passenger service, Waka Kotahi verifies the background of an applicant for an endorsement to carry passengers, including criminal history, traffic offences, and medical health (Waka Kotahi New Zealand Transport Agency, n.d. b). The certificate of knowledge is a two-hour open books computer base test, with a required 80 percent pass mark. This test of knowledge seemingly is done once only but the certificate must be submitted with every renewal application. The medical certificate seemingly is also done only if not provided in the last five years or unless the applicant has turned 75-years-old, then it will be required again.

In the US, Australia, New Zealand, Hong Kong, and UK the term commercial driver licence (CDL) is used rather than professional driving permit. In the US the MAP-21 Act was legislated and implemented during 2012 with the main intent to reduce crashes, injuries and fatalities involving large trucks and buses (AAMVA, 2022).

### **Medical Certification**

A South African professional driver requires in terms of the regulations, a medical certificate as part of the application for a PrDP. The integration with HPCSA as mentioned under the Driving Licence Renewal will allow for an integration mechanism for Medical Practitioners to record their findings of an applicant via a NaTIS online web-service. In this regard the specifics of the examination and medical practitioner can be redacted as part of the relevant privacy and protection of personal information legislation, but the over-all result, as to whether an applicant meets the medical criteria as required by legislation is then accessible as part of the systems behaviour. The application is then either successful or unsuccessful based the overall result.

This NaTIS online mechanism will also eliminate the current practice of medical certificates being issues at the side of the DLTC premises by unscrupulous and criminal elements.

In the US as part of the FMCSA Medical certification requirements, to deliver a copy of their medical examiner's report.

### **Criminal Background Check**

South Africa requires a criminal background check that needs to be done as part of the application for professional driving permit process. An applicant that has been found guilty during the past five years of driving under the influence of liquor or drugs, reckless driving and if applying for passenger and dangerous goods permit with a criminal background of which violence was an element may not be successful in obtaining a PrDP.

The RTMC as directed will also pursue the integration of this process into the Smart Enrolment units currently being designed for DLTCs. This will eventually see an applicant being assisted in one place by seeing only one official.

The above elements as discussed, the eye testing, the provision of a medical certificate and the criminal background check will all contribute to an improved customer experience whilst also dealing with inherent operational inefficiencies and at the same time combating fraud and corruption. These will augment the proposed extension of the validity period of a Driving Licence, as it holistically addresses all critical issues in the processing of applications with the South African landscape.

## 2.2 Validity Period

The current regulation stipulates that the period of validity of a driving licence is indefinite but requires that drivers in South Africa renew their driving licence cards every 5 years. However, drivers are permitted to drive legally with a penalty issued as a fine once their licence has expired (OUTA, 2022). Drivers are not only subjected to financial implications but may suffer insurance claim and employment issues due to a lapsed validity period. In November 2013 the Minister (at the time Dipuo Peters) amended the regulations (Regulation 108(5)(a)) to extend the validity period of the driving licence card from 5-years to 10-years under the Government Gazette No.37048, subject to implementation by the minister by notice. Despite this, additional amendments was published in October 2014 in Government Gazette No.318142, with the validity period of 5-years, subject to implementation by the minister by notice in the Gazette. This later publication was also not implemented and therefore did not replace the previous publication in Government Gazette 37048.

A major reason for road crashes and threats to road safety is the inability or impairment of one or more drivers who are involved in a collision to appropriately lookout. As noted by Samuel Broadi, et al, South Africans are bound by legislation to have an eye-test done every five years to verify their visual fitness by meeting minimum visual acuity and visual field requirements which have been legislated since 1998 (Boadi-Kusi, Mathebula, & Kok, 2016). This seems to be the primary argument for driving licence card validity period, to assess driver fitness.

According to South African legislation, all persons are required to undergo an eye testing in addition to having their fingerprints taken upon renewing their licences. This can be done by an optometrist and submitted to the driving licence testing centre (DLTC) or done in the DLTC. If the applicant's eyesight has deteriorated from the day of the last issue, new conditions shall then be attached to the current licence's validity period, this has been sufficiently discussed in detailing earlier chapters.

Broadi et al, further emphasises that much investment has gone to the standardization of this practice, from procuring eye-testing equipment as well as retaining examiners throughout the driving licence centres. However, this process has been noted to be cumbersome and time consuming to both the driving licence holders as well as the centres, necessitating an extension of validity period of a licence to reduce such strenuous processes. Other studies conclude that drivers with visual defects are no more vulnerable to have accidents than those with normal vision (Cashwell, 1970) & (Owesley & McGwin Jr, 2010). This is drawn after critical review of 211 literature related to driving competency, accidents, and vision.

Juxtaposed to this conclusion a study conducted in the Southwest Ethiopia with 249 sampled drivers resulted in a significant association between visual impairment and road traffic accidents (Biza, Mossie, Woldemichael, & Gelaw, 2013). However, the same paper noted that there is no sufficient evidence which indicates that vision alone causes traffic accidents. The consensus is that vision fitness is of importance however the current eye-testing protocol is obsolete and has little value to the holistic value to driver fitness and driving licence validity.

Even though this report is not focused on reviewing the validity of eye testing in South Africa, it can be concluded that the current protocol cannot form a solid basis for the 5-year renewal process. (Boadi-Kusi, Mathebula, & Kok, 2016), highlights; it is far more important to have a comprehensive eye examination by qualified professionals than simply testing visual acuity. Existing literature notes the prevalence of visual deterioration over time and in certain groups of the population. This is highly instrumental in assessing the adequate time between comprehensive eye examinations and subsequently driver validity periods.

Driving licence card renewals in 40 countries were analysed, i.e., 20 countries with a road safety ratio (deaths per 100 000 population) better than South Africa and 20 countries that had a poorer road safety rating (deaths per 100 000 population) poorer than South Africa (WHO, 2018). The validity period in the 40 countries range from 1-20 years with an average of 6,8 years. The countries ranked above South Africa according to the WHO have an average driving licence validity period of 9,3 years and countries ranked lower than South Africa averaging 4.4 years. It needs to be highlighted that many of the poorer

road safety ranked countries are still using paper-based driving licences which would explain the lower average validity period in these countries.

The average driving licence card validity period of almost 10 years in more developed countries, with better road safety ratios highly motivate and validates a longer renewal period in line with international best practice. Blindly assuming international practice without critically contrasting South Africa's context with these countries would be potentially damaging to the driving licence system.

A report conducted by OUTA indicates the average driving licence renewal period of 5,6 years in Africa which is observed to be the lowest in the 6 continents with the exclusion of Antarctica (OUTA, 2022).

In this study Rwanda was observed to have a driving licence renewal period of 10 years which is also related to the age of the driver; the 10-year validity period is applicable for all persons under the age of 65. Thereafter between 65 and 70 years, the licence will be valid up until the holder turns 73 years of age and beyond that the holder has to renew the licence after 3 years (Rwanda Final Report, TTFP).

A blanket approach cannot be assumed to all drivers with regards to their ability to be behind the wheel. India's regulation allows drivers to renew their licence after 20 years or until they reach the age of 50 years, whichever comes first. Thereafter, the licence is valid for 5 years after the holder turns 55. This categorized approach to driving licence validity period could be adopted as different population groups (age groups) undergo different changes as noted earlier. According to the American Optometric Association eyesight begins to rapidly deteriorate between the age of 41 to 60 (AOA, 2022). This should be taken into consideration when assigning a validity period to different age groups.

The minister of transport has the authority under section 75 of the National Road Traffic Act, no 93 of 1996 to make regulation which are to be permitted, prescribed, or contemplated in agreement with this Act upon consultation with the MEC's. The protocol to amend and change driving licence validity period can thus be easily published through the Government Gazette (OUTA, 2022). The validity period is primarily motivated by driver fitness, and to ensure that the licence holder is in relatively the same condition as they were when obtaining the licence. This is assessed through the visual acuity test which has been discussed earlier to have inconsequential results on driver fitness. The validity period is thus based on inconclusive evidence to support the 5-year renewal period and a 10-year renewal period is recommended (OUTA, 2022).

## 2.3 Driving Licence

This section deals with the driving licence card type employed by the compared developed countries. The type of material used to produce the card impacts on the durability of a licence document.

In addition, this part discusses the driving licence categories that determine what type of vehicle might be operated by that category as implemented in the comparative developed world countries. Furthermore, it reviews the South African driving licence categories and compare with the UN Vienna Convention on Road Traffic 1968.

### 2.3.1 Driving Licence Types

The current South African driving licence is secured paper card that has been laminated with various security features. However, the durability initially was in question as so the driving licence validity period was set to five years.

Various request from technical committees indicated that after 10 years some of the member's licence card as still in good pristine condition. Professional driving licences which are used on a daily basis under harsher conditions are only valid for two years. Their licences will therefore be replaced before it deteriorates to a state that it is unreadable, due to be in the wash and the cover has started to split.

## Polycarbonate Card

The polycarbonate.com website emphasises that polycarbonate card bodies for driver licences, identity documents and even passport pages are providing a layered security approach to physical documents, making them more complex to counterfeit.

Polycarbonate material offers a few distinct features that make it uniquely beneficial for physical driving licence and identification cards. These features include:

- ▶ Advanced, tamper-proof security features;
- ▶ High-quality personalization details;
- ▶ Stronger card material;
- ▶ Longer document life; and
- ▶ Multiple Laser Image.

However, the most important advantage of polycarbonate is the durability benefits derived. Polycarbonate cards consists of multiple layers of plastic that form a singular fused piece, which makes it virtually impossible for fraudsters to change the materials or security features without destroying the card completely due to the material fusing together (unlike PVC). This makes the polycarbonate card body much more secure than other available materials.

Another aspect of polycarbonate is the laser engraving techniques used to embed an individual's personal information into the card body itself. The laser engraving process adds markings deep in the document, adding another aspect that is extremely difficult to forge.

Beyond laser engraving, polycarbonate cards include other tamper-proof components that can be tactile, seen with the naked eye, or only visible with additional equipment. The level of security features varies but can be easily distinguished by law enforcement or other authorities. Once police officers or others are familiar with identifying the security features, verifying the authenticity of an identity document is much easier. Multiple laser imaging is a must when moving to polycarbonate cards (polycarbonatecard.com, n.d).

US federal and other state agencies strives to maximise the lifespan of a document as far as possible, and a 10-year lifespan is viewed as the ultimate objective at this stage. The durability of polycarbonate cards is minimum 10 years (Campusidnews staff, 2016). This durability adds to the suitability and possibility of issuing driving licence cards for a period of 10 years in South Africa.

Polycarbonate cards are popular for European credentialing projects (Campusidnews staff, 2016) The EU prescribe that the physical characteristics of the driving licence card of the European Union model driving licence shall comply with ISO 7810 and ISO 7816-1. The driving licence card of all EU member states shall be made of polycarbonate.

The EU prescribes that the methods for testing the characteristics of driving licences for the purpose of confirming their compliance with the international standards shall be in accordance with ISO 10373.

The EU stressed the following threats to the physical security of EU model driving licences are:

- ▶ production of false cards through the creation of a new object which bears great resemblance to the licence document, either by making it from scratch or by copying an original document; and
- ▶ alteration of material by changing a property of an original document, e.g. modifying some of the data printed on the document.

The overall security of the EU driving licence is regarded to be in the system in its entirety, which consists of:

- ▶ the application process;
- ▶ the transmission of data;
- ▶ the card body material;
- ▶ the printing technique;
- ▶ a minimum set of different security features, and
- ▶ the personalisation process.

The material used for driving licences shall be made secure against forgery by using the following techniques (mandatory security features):

- ▶ card bodies shall be UV dull;
- ▶ a security background pattern designed to be resistant to counterfeit by scanning, printing or copying, using rainbow printing with multicolour security inks and positive and negative guilloche printing. The pattern shall not be composed of the primary colours (CMYK), shall contain complex pattern designs in a minimum of two special colours and shall include micro lettering;
- ▶ optical variable elements providing adequate protection against copying and tampering of the photograph;
- ▶ laser engraving, and
- ▶ in the photograph area the security design background and photograph should overlap on at least its border.

In addition, the material used for driving licences shall be made secure against forgery by using at least three of the following techniques (additional security features):

- ▶ colour-shifting inks;
- ▶ thermochromic ink;
- ▶ custom holograms;
- ▶ variable laser images;
- ▶ ultraviolet fluorescent ink, visible and transparent;
- ▶ iridescent printing;
- ▶ digital watermark in the background;
- ▶ infrared or phosphorescent pigments; or
- ▶ tactile characters, symbols or patterns.

Both the Australian and New Zealand authorities issue plastic licence cards, and there is general uniformity in the contents of the card (licence details, security features, photo of licence holder, signature of licence holder) (Hawkins, 2018:23).

In the US the REAL ID act mandates that driving licences and identification cards have issuance cycle of maximum 8 years. However, the AAMVA standard requires a durability of at least 10 years (Thales DIS, 2021).

Thales (2021) reports that polycarbonates are a robust thermoplastic also used for bullet-proof glass and indestructible eyeglasses. Moreover, in card manufacturing the polycarbonate sheets are layered to produce the strongest, most durable substrate. Unfortunately, polycarbonates require unique and specific skill and expertise for the card building process (Thales DIS, 2021). For this reason, it is better to have a driving licence card centralised production facility, to also guarantee security. Therefore, the AAMVA and the ISO18013 standards suggest that a central facility be used for production of the driving licence cards.

### **Electronic Driving Licence Cards or Digital Driving Licences**

The availability of online and mobile digital services has proven itself in a wide array of applications and usefulness especially since the launch of smart mobile phones. Mobile services such as banking services that are accessible at any time and place and makes it easy to use is at the order of the day. This is also evident in the drive from the RTMC to make online services available on NaTIS to provide amongst others driving licence bookings and renewal of vehicle licences. The many service delivery issues and challenges with the production of driving licence cards in South Africa have further ignited interest from various organisations and members of public regarding the possibility of an electronic driving licence.

However, it should be noted that Annex 6 of the 1968 Vienna UN Convention on Road Traffic prescribe that the driving licence must be in the form of a document and may be made of plastic or paper. In this regard an electronic or digital driving licence is still not fully implementable by signatory countries to the 1968 Vienna UN Convention on Road Traffic.

In Europe several the Association of European Vehicle and Driver Registration Authorities (EReg) members (e.g., Finland, Netherlands, Spain, and Sweden) are examining the introduction of a non-physical driving licence on a mobile platform. The United Kingdom is also examining a mobile device that allows the presentation of the driver licence for purposes other than law enforcement, such as for an employer or service provider.

The EU's third Directive on driving licences (2006/126/EC), dictates the current European legal framework on driving licences which was adopted on 20 December 2006 and came into force on 19 January 2013.

This directive has challenges to mitigate as this does not recognise the concept of a digital or non-physical licence product. The EReg highlights an EU study that has also acknowledged working group 10 (JTC1-SC17-WG10- TF 14): 'Motor vehicle driver licence and related documents' of the International Standards Organisation ISO for its efforts to develop a standard that will facilitate cross-border and cross-jurisdictional recognition of mobile driving licences. Australia is also represented on this ISO working group 10 (Hiltunen, P., Karppinen, S., Van den Berg, B. & Arts G., 2018).

Australia have implemented a digital driving licence mobile application in most of its jurisdictions. In New South Wales, a trial run of the digital driving licence was first done in Sydney's Eastern Suburbs, Dubbo, and Albury before it was deployed state--wide in October 2019. The digital driver licences mobile application, is made available through the Service NSW app. This application displays dynamic content including demerit points, expiry date, suspension details and licence conditions. Drivers in addition still receive a physical licence card for backup purposes for interstate and overseas travel usage (Hawkins, 2018:23). South Australia became the first state to officially roll out digital driving licences via its mySAGOV smartphone application in October 2017. This digital driving licence provided the means to display and verify driving licence details in a secure manner on a digital device such as a mobile phone (Hawkins, 2018:23).

Queensland has since 2020 trialled the digital licences in the Fraser Coast Region. As of March 2021, the Queensland government is considering next steps for the trial to Townsville and the full roll-out to Queensland during 2023 (Queensland Government, 2022:1).

The Washington Post reported on 11 October 2021 that more than 20 of the US states have also considered or deployed an electronic driving licence on smartphones (Velazco, 2021) Alabama has implemented smartphone driving licences since 2015 (News 19, 2019).

Australia and the US are part of the countries that did not ratified the UN 1968 Vienna Convention on Road Traffic, and therefore might not have the limitation that the driving licence must be a document in paper or plastic format. However, they still took into consideration that their people might visit other countries and issued a physical licence together with the digital licence as part of the trial. Drivers still have the option to choose whether they want the digital driving licence or not.

Currently many business parks organisations in South Africa are using a scanning device than scans the barcode on the vehicle's licence disc as well as the driving licence of the driver before granting access to their premises. The introduction of a digital non-physical driving licence might have to provide the details for scanning with this device or some other interactive NFC means.

The ISO driving licence details is available perhaps a prototype digital driving licence can be developed that meeting these criteria keeping in mind that when a further change might be ready for further development.

### **Digital licence security and privacy**

The digital licence mobile application contains the driver's personal information, security and privacy is therefore of utmost importance. The content of the digital driving licence is encrypted and stored safely on the device. The holder has both a pin and password to protect access to the mobile application. Should a phone get lost or stolen, they will not be able to access the details. The holder can choose who the information may be shared with, when access is granted, where the access is granted and how it is shared.

If the driver opts to share the information with a business or organisation, the business can scan the QR bar code on the device to view the information, but the information is not stored on the business's device. The digital licence application makes use of Bluetooth technology to interact with another device to share the information. The Bluetooth technology requires the device's location services to be switched on, but the application does not track the device's location or store the location (Queensland Government, 2022:1 and 2020:1).

### **Benefits of Digital Non-Physical Licence**

The following are potential benefits that South Africa can derive from a digital non-physical driving licence:

- ▶ Improvement of service delivery and the reduction of driving licence card production backlogs;
- ▶ If a driver opts for both digital non-physical and physical driving licence card, the dependency on a temporary driving licence and affidavit as temporary proof of licence can be removed;
- ▶ Reduction on dependency of physical face value paper, if kept electronic;
- ▶ Drivers that never plan to leave South Africa need not concern themselves getting a physical driving licence but must get a physical licence should the person decide to leave the country;
- ▶ Easier communication with driver, as contact detail is known, and message can be pushed to driver via the mobile application;
- ▶ Push notification to driver about required software revision updates;
- ▶ Reminders to drivers on the requirement to renew eye test and or police clearance, else the driving licence will be suspended until driver complied;
- ▶ Much reduced fee or zero fee can be charged for the initial digital non-physical driving licence and perhaps much smaller annual driving licence maintenance fee can be levied;
- ▶ Driving licence is issued indefinitely and no duration dependence on the physical card expiry period;
- ▶ Direct communication with server to have the latest information regarding the licence, suspension /cancellation, demerit points, infringements and fines;
- ▶ If the network is down the last information will be on the device;
- ▶ If a driver is convicted of a criminal offence that impacts on PrDP for passengers, the PrDP the suspension would be available on the mobile application;
- ▶ Operators can verify their driver's driving licence and infringement history that prohibit the driver from operating a vehicle; and
- ▶ If the driver is the owner of vehicles that can also be reflected and the licence status or if a vehicle is registered on that person's name without knowing.

### **Potential Drawback of Digital Licence**

If a driver is pulled over for speeding the driver need not hand over the digital licence but the officer needs its own device to scan the licence and need not handle the driver's phone. However, concern has been raised about the conduct of a traffic officer that might insist on taking the driver's phone. Traffic officers will need to be properly trained to deal with digital licences. The legislation should be clear on the use of the digital licence when stopped by traffic and police officers (Velazco, 2021).

A further problem for a driver could be if the driver gets pulled over and the battery of the phone has died the driver will be charged for driving without a driving licence.

### **Adoption of Digital Licence Technology by Mobile Phone Developers**

Apple, as reported by The Washington post on October 2021, adopted the digital licence and considered it a big deal as many US citizens own Apple iPhones, and highlights research by Strategy Analytics that indicates that 37 percent of smartphones shipped in the US is Apple iPhones.

Google has also developed support of verifiable electronics identification (ID) on the Android platform and together with Apple defined a technical standard on the operation of digital IDs. The technology already exists in Android 11 and 12 but not fully deployed in any of the applications (Velazco, 2021)

Apple on 1 September 2021, announced that Arizona, Connecticut, Georgia, Iowa, Kentucky, Maryland, Oklahoma, and Utah are among the first US states that will make use of the Apple wallet to bring state IDs and driving licences to their residents (Apple, 2021).

### Mobile Driving Licence Standard

Part 5 of the ISO 18013 – ISO compliant driving licence released in 2021 details the standard requirements for Mobile driving licence (mDL) application.

The ISO (ISO, 2021) highlights on its website that the ISO 18013: part 5 document specifies the interface requirements between the mDL and mDL reader and the interface between the mDL reader and the issuing authority infrastructure. This further enables entities other than the issuing authority (e.g., other issuing authorities, or mDL verifiers in other countries) to:

- ▶ use a machine to obtain the mDL data;
- ▶ link the mDL to the mDL holder;
- ▶ authenticate the origin of the mDL data; and
- ▶ verify the integrity of the mDL data.

## 2.3.2 Driving Licence Codes

Annex 6 of the 1968 Vienna UN Convention on Road Traffic prescribe the following categories of vehicles for which the domestic driving permit may be valid:

- A Motorcycles.
- B Motor vehicles, other than those in category A, having a permissible maximum mass not exceeding 3,500 kg and not more than eight seats in addition to the driver's seat; or motor vehicles of category B coupled to a trailer the permissible maximum mass of which does not exceed 750 kg; or motor vehicles of category B coupled to a trailer the permissible maximum mass of which exceeds 750 kg but does not exceed the unladen mass of the motor vehicle, where the combined permissible maximum mass of the vehicles so coupled does not exceed 3,500 kg.
- C Motor vehicles, other than those in category D, having a permissible maximum mass exceeding 3,500 kg; or motor vehicles of category C coupled to a trailer the permissible maximum mass of which does not exceed 750 kg.
- D Motor vehicles used for the carriage of passengers and having more than eight seats in addition to the driver's seat; or motor vehicles of category D coupled to a trailer the permissible maximum mass of which does not exceed 750 kg.
- BE Motor vehicles of category B coupled to a trailer the permissible maximum mass of which exceeds 750 kg and exceeds the unladen mass of the motor vehicle; or motor vehicles of category B coupled to a trailer the permissible maximum mass of which exceeds 750 kg, where the combined permissible maximum mass of the vehicles so coupled exceeds 3,500 kg.
- CE Motor vehicles of category C coupled to a trailer whose permissible maximum mass exceeds 750 kg.
- DE Motor vehicles of category D coupled to a trailer whose permissible maximum mass exceeds 750 kg.

Under categories A, B, C, CE, D and DE, domestic legislation may introduce the following subcategories of vehicles for which the driving permit may be valid:

- A1 Motorcycles with a cubic capacity not exceeding 125 cm<sup>3</sup> and a power not exceeding 11 kW (light motorcycles).



B1 Motor tricycles and quadricycles.

C1 Motor vehicles, except for those in category D, the permissible maximum mass of which exceeds 3,500 kg but does not exceed 7,500 kg; or motor vehicles of subcategory C1 coupled to a trailer, the permissible maximum mass of which does not exceed 750 kg.

The EU generally subscribes to the UN driving licence classification, however, there are deviations from the UN descriptions on the motorcycles and motor vehicles for code C1E. Furthermore, the EU have an additional code A2 Medium motorcycle licence classification.

Switzerland follows the EU classification, but also caters for categories F-industrial machinery, G tractors (ASA, 2022).

The UK still use the EU driving model except for the country code and EU logo.

In UK and EU countries a learner moped, or motorcycle rider can take the following tests, depending on their age and which route of progression they choose to take:

- ▶ Category AM moped – allowed a moped of 50 cubic centimetres (cc) capacity or less which has a top speed of no more than 28mph (45km/h). The minimum age for category AM is 16 years.
- ▶ Category A1 light motorcycle – authorise a motorcycle with an engine capacity up to but not exceeding 125cc (11kW/14.6 bhp) The minimum age for category A1 is 17 years.
- ▶ Category A2 medium sized motorcycle – a motorcycle with an engine capacity of at least 395cc with an engine power output of at least 25kW (33 bhp) and not exceeding 35kW (46.6 bhp) and a power to weight ratio not exceeding 0.2kW per kilogram. The minimum age for category A2 is 19 years.
- ▶ Category A large sized motorcycle –a motorcycle with an engine capacity of at least 595cc with an engine power output of 40kW, allows to ride a motorcycle of any size. The minimum age for category A is 21 years via the progressive qualification route, and 24 year if applied directly for that licence.

Tests for mopeds with three or four wheels, A1 and A tricycles and sidecar combinations will only be offered to the physically disabled. In South Africa a “reverse” tricycle is allowed under code A, and not just for physically disabled persons.

Driving a heavy motor vehicle in the EU and UK, the driver must hold a driving licence category B before being allowed to take a test for this category. If you want to drive an HMV, you must obtain category C or C1 entitlement. The category you apply for will depend on the weight of vehicle you wish to drive. Note that although South Africa also have a code C1 medium heavy motor vehicle licence that there is a major difference in the weight classification, with EU allowing up to a weight of 12000 kilograms while in South Africa this category allows a weight rating of up to 25000 kilograms.

Driving a bus in the EU and UK, the driver must hold a driving licence category B before being allowed to take a test for this category. If you want to drive buses, you must obtain category D or D1 entitlement.

Australia is not a signatory to the UN Vienna Convention has the following driving licence classes, which differs significantly from the UN prescripts and the driving licence classification of the rest of the world.

**Table 3:** Australian Driving Licence Categories

Class	Type	Description
C	Car licence	Covers vehicles up to 4.5 tonnes <b>gross vehicle mass</b> (GVM). GVM is the maximum allowed weight of the vehicle when loaded. The licence allows the holder to drive cars, utilities, vans, some light trucks, car-based motor tricycles, tractors and implements such as graders, vehicles that seat up to 12 adults, including the driver.
R	Rider licence	Applies to motorcycle riders with any registrable motorcycle.

<b>RE</b>	Restricted Rider licence	Covers motorcycles matching the LAMS (Learner Approved Motorcycle Scheme) list of motorcycles of each state. Generally, this means abiding by a power-to-weight ratio and a total engine size limit. Riders must hold this licence for 12 months before being permitted to upgrade to a R class motorcycle licence.
<b>LR</b>	Light Rigid licence	Covers a rigid vehicle with a GVM of more than 4.5 tonnes up to 8 tonnes. Any towed trailer must not weigh more than 9 tonnes GVM. This class also includes vehicles with a GVM up to 8 tonnes which carry more than 12 adults including the driver. A holder of a LR licence is also permitted to drive vehicles in class C.
<b>MR</b>	Medium Rigid licence	Covers a rigid vehicle with 2 axles and a GVM of more than 8 tonnes. Any towed trailer must not weigh more than 9 tonnes GVM. A holder of a MR licence is also permitted to drive vehicles in class LR and lower.
<b>HR</b>	Heavy Rigid licence	Covers a rigid vehicle with 3 or more axles and a GVM of more than 8 tonnes. Any towed trailer must not weigh more than 9 tonnes GVM. This class also includes articulated buses. A holder of an HR licence is also permitted to drive vehicles in class MR and lower.
<b>HC</b>	Heavy Combination licence	Covers heavy combination vehicles like a prime mover towing a semi-trailer, or rigid vehicles towing a trailer with a GVM of more than 9 tonnes. A holder of an HC licence is also permitted to drive vehicles in class HR and lower.
<b>MC</b>	Multi-Combination licence	Covers multi-combination vehicles like road trains and B-double vehicles. A holder of an MC licence is also permitted to drive vehicles in class HC and lower.

New Zealand also is not a signatory to the UN Vienna Convention and employs a different driving licence class system, namely:

- ▶ Class 1 Light motor vehicle
- ▶ Class 2 Light goods vehicle
- ▶ Class 3 Medium goods vehicle with large trailer
- ▶ Class 4 Heavy goods vehicle without a trailer
- ▶ Class 5 Heavy goods vehicle with a large trailer
- ▶ Class 6 Motorcycle

With an endorsement system.

Singapore has its own different licence class system

- ▶ Class 1 Invalid carriage
- ▶ Class 2 Motorcycles >400cc
- ▶ Class 2A Motor cycle >200cc but < 400cc
- ▶ Class 3 Motor cars 7 passengers excluding driver with unladen weight does not exceed 3 000 kilograms or tractors unladen weight does not exceed 2 500 kilograms
- ▶ Class 3A Automatic class 3 vehicles
- ▶ Class 4 Heavy motor cars and motor tractors unladen weigh >2 500 kilograms
- ▶ Class 4A Heavy motor cars which are omnibuses (public service vehicles)
- ▶ Class 5 Light locomotives (motor vehicles) to carry load <11 500 kilograms unladen weight

The United States is also not a signatory to the UN Vienna Convention. In the US the Arizona department of transport define the classes of licences (Arizona Department of Transport, 2022:10-13) in their driver licence manual and customer guide as follow:

- ▶ Graduated Class G
- ▶ Motorcycle licence (Class M)
- ▶ Operator licence (class D)
- ▶ Commercial driver licence (class A, B or C)

Canada has harmonised its driving licence categories and licence types with the US.

It seems to be the trend that all the signatory countries to the UN Vienna convention to some degree support the driving licence classification system whilst those countries not signatory to the Vienna convention employ their own different driving licence classification system.

In South Africa's case the driving licence codes are like the previous prescript of the UN Vienna Convention Annex 6 requirements but does not yet cater for the bus classifications D and DE. These are still intertwined with the heavy motor vehicle codes C1, C, EC1 and EC. Furthermore, while the convention Annex 6 par 9 provide for Domestic legislation that may introduce categories and subcategories of vehicle other than those listed, category C1 and C1E, D1 is specifically addressed par 8 in the convention. However, there is a potential problem with the definition of the code C1 driving licence in South Africa that allows for the operation of a vehicle with a weight up to 16 000 kilograms, while the UN convention indicates the upper weight limit to be only 12 000 kilograms.

The EU policy prescribes the minimum age for obtaining a driving licence for category D and DE to be 24 years, while in South Africa the minimum age to obtain the licence is 18 years, but with the additional requirement of a category P – Passenger PrDP which has an age restriction of 21 years.

## 2.4 Socio and economic factors

South Africa, the southernmost country on the African continent, renowned for its varied topography, great natural beauty, and cultural diversity, all of which have made the country a favoured destination for travellers since the dawn of democracy in 1994. The vast majority of black South Africans were not enfranchised until 1994. Africa is a developing country and ranks 113th on the Human Development Index, the seventh highest in Africa. It has been classified by the World Bank as a newly industrialized country, with the second-largest economy in Africa, and the 33rd-largest in the world. South Africa also has the most UNESCO World Heritage Sites in Africa. The country is a middle power in international affairs; it maintains significant regional influence and is a member of the G20. Today South Africa enjoys a relatively stable mixed economy that draws on its fertile agricultural lands, abundant mineral resources, tourist attractions, and highly evolved intellectual capital. Greater political equality and economic stability, however, do not necessarily mean social tranquillity. South African society at the start of the 21st century continued to face steep challenges: rising crime rates, ethnic tensions, great disparities in housing and educational opportunities, and the AIDS pandemic. South Africa is bordered by Namibia to the northwest, by Botswana and Zimbabwe to the north, and by Mozambique and Swaziland to the northeast and east. Lesotho, an independent country, is an enclave in the eastern part of the republic, surrounded by South African territory. South Africa's coastlines border the Indian Ocean to the southeast and the Atlantic Ocean to the southwest. (State of road safety report: 1 Jan 2020 – 31 December 2020 9 4.2 )

According to Statistics South Africa (Stats SA), the midyear population of South Africa has increased to an estimated 59,62 million in 2020. In addition, about 28,6% of the population is aged younger than 15 years and approximately 9,1% (5,4 million) is 60 years or older. Of those younger than 15 years of age, the majority reside in KwaZulu-Natal (21,8%) and Gauteng (21,4%). Of the elderly (those aged 60 years and older), the highest percentage 24,1% (1,31 million) reside in Gauteng. The proportion of elderly persons aged 60 and has grown from 7,6% in 2002 to 9,1% in 2020 (Stats SA, Mid-Year 2020 Report).

South Africa has 13 million registered vehicles and with more or less a third of households have a motor vehicle.

The key development challenges in South Africa are that even though South Africa has made considerable strides to improve the wellbeing of its citizens since its transition to democracy in the mid-1990s, but progress has stagnated in the last decade. The percentage of the population below the upper-middle-income-country poverty line fell from 68% to 56% between 2005 and 2010 but has since trended slightly upwards to 57% in 2015 and is projected to have reached 60% in 2020.

Structural challenges and weak growth have undermined progress in reducing poverty, which have been heightened by the COVID-19 pandemic. The achievement of progress in household welfare is severely constrained by rising unemployment, which reached an unprecedented 35.3% in the fourth quarter of 2021. The unemployment rate is highest among youths aged between 15 and 24, at around 66.5%.

South Africa remains a dual economy with one of the highest, persistent inequality rates in the world, with a consumption expenditure Gini coefficient of 0.67 in 2018. High inequality is perpetuated by a legacy of exclusion and the nature of economic growth, which is not pro-poor and does not generate sufficient jobs. Inequality in wealth is even higher and intergenerational mobility is low meaning inequalities are passed down from generation to generation with little change over time.

(<https://www.worldbank.org/en/country/southafrica/overview#1>)

Access to medical care and routine medical care differs according to income and access to either private or government medical centres and distance to those.

Routine eye testing during a person lifetime is recommended, yet almost three-quarters of South Africans sampled were not utilizing eye care services. It is imperative to strengthen current public health measures (including eye health promotion programs) to address the alarmingly low uptake of eye care services as well as the disparities in eye care utilization in South Africa.

(<https://bmchealthservres.biomedcentral.com/articles/10.1186/s12913-020-05621-8>)

## 3 Comparative Analysis

The EU benchmark countries were taken from 64 countries in Table 1 that are considered developed countries according to the Human Development Index (HDI). The European Union has managed to have a competitive policy on driving licences; thus, a sample of EU countries was taken from the 64 countries. In total, 27 countries with a validity period of 10 years and above were employed for the comparative analysis.

This section presents the analysis of a sample of 27 EU benchmark countries. The data was extracted from several online sources based on desktop research conducted. The analysis is structured into 6 parts namely:

- ▶ Establish EU benchmark countries;
- ▶ Validity Period of EU benchmark countries;
- ▶ Age limit of validity period;
- ▶ Validity period for heavy vehicles;
- ▶ Legal Driving age; and
- ▶ Materials used for driving licences

It should be noted that this analysis was conducted from limited information already captured. Most of the solutions were taken from processes done in European Union (EU), bearing in mind that systems are not the same, the way data is captured is not the same, the Driving Licence Categories (codes) are also not the same.

### 3.1 EU Benchmark Countries

These countries are used to find trends in best practises that can be incorporated in South Africa. The list of the 27 EU benchmark countries is shown in Table 4 below:

**Table 4:** EU Benchmark Countries

EU benchmark Countries		
Netherlands	Slovenia	Lithuania
Ireland	Luxembourg	Poland
Spain	France	Latvia
Belgium	Czechia	Portugal
Denmark	Malta	Slovakia
Germany	Estonia	Hungary
Sweden	Italy	Croatia
Finland	Greece	Romania
Austria	Cyprus	Bulgaria

#### 3.1.1 Validity Period of EU benchmark Countries for Cars and Motorcycles

Several aspects affect the validity periods of driving licences renewal in the EU benchmark countries. The renewal validity depends on:

- ▶ Driver's age;
- ▶ The category of the driving licence;
- ▶ Medical grounds for a driving licence with a shorter validity period; and

► Traffic offences.

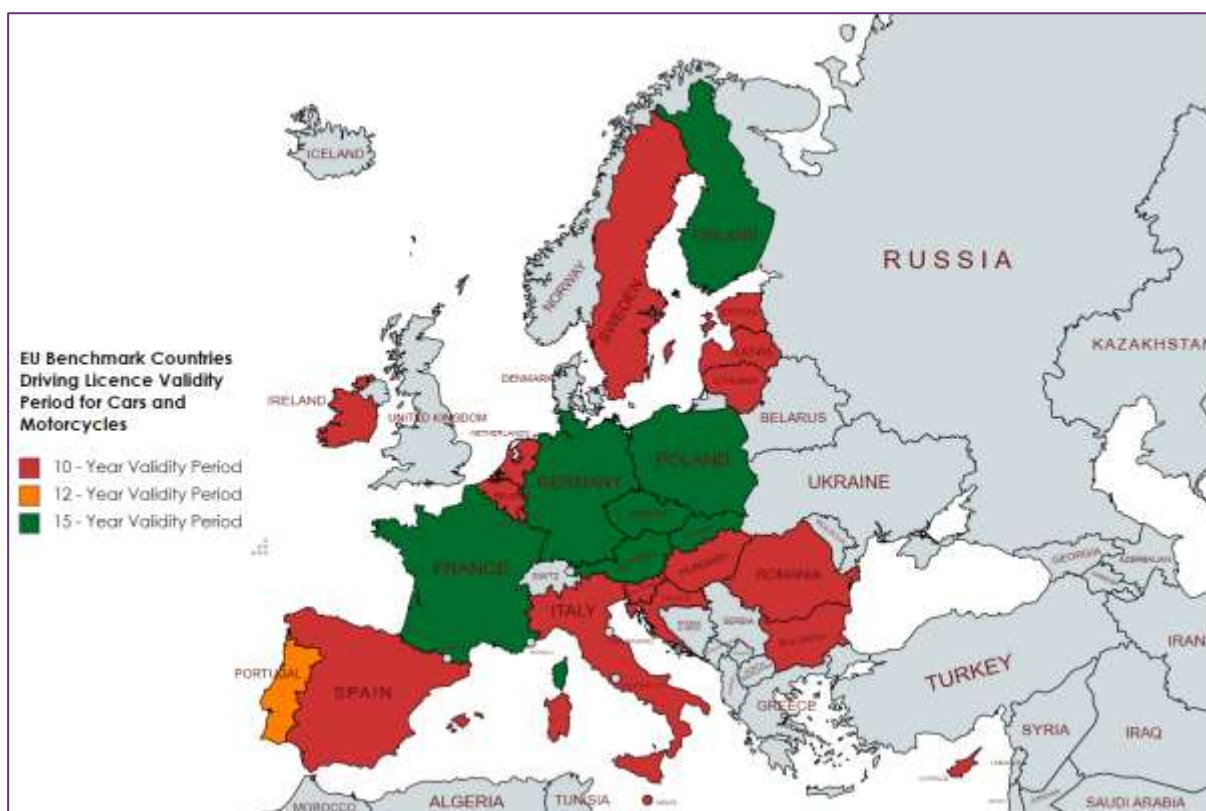
This study focused on the EU benchmark countries that had a driving licence validity period of over ten years for cars and motorcycles

The table below shows the EU Benchmark countries and the respective validity period:

**Table 5: EU Benchmark Countries Validity Period for Cars and Motorcycles**

Country	Validity Period (Years)
Netherlands	10
Ireland	10
Spain	10
Belgium	10
Sweden	10
Slovenia	10
Luxembourg	10
Czechia	10
Malta	10
Estonia	10
Italy	10
Lithuania	10
Latvia	10
Hungary	10
Croatia	10
Romania	10
Bulgaria	10
Portugal	12
Denmark	15
Germany	15
Finland	15
Austria	15
France	15
Greece	15
Poland	15
Slovakia	15
Cyprus	15

17 Countries out of the 27 countries have a 10-year validity period. 9 countries have a 15-year validity period and 1 has a 12-year validity. Figure 1 illustrates the different validity periods in the EU benchmark countries.



**Figure 1: EU benchmark Countries' Driving Licence Validity Period**

The longer validity period of driving licences in the EU benchmark countries arise from the presence of EU Driving licences that are valid for life and are recognised in all EU countries. The driving licence rules in these countries are informed by the EU regulations.

### 3.1.2 Age Limit of the Validity Period for Cars and Motorcycles

In most of the EU benchmark countries, there is an age limit in which the validity period of a driving licence begins to decrease from the typical 10 or 15 years to 5 years or lower.

The decrease in the years emanates from the assumption that adult vision starts deteriorating from the age of 40. The most common eyesight problems adults develop between ages 41 to 60. This normal change in the eyes' focusing ability, called presbyopia, will continue to progress over time (America Optometric Association, 2022). In some of the EU benchmark countries, traffic offences will also reduce the driving licence validity to a 5-year period, like in countries such as Hungary. Traffic offences typically include:

- ▶ Failure to use a seat belt;
- ▶ Driving under the influence of alcohol;
- ▶ Speeding; or
- ▶ Failure to stop at a red traffic light.



The age limit in which the EU benchmark countries' driving licence validity period for motorcycles, mopeds and cars begins to decrease is shown

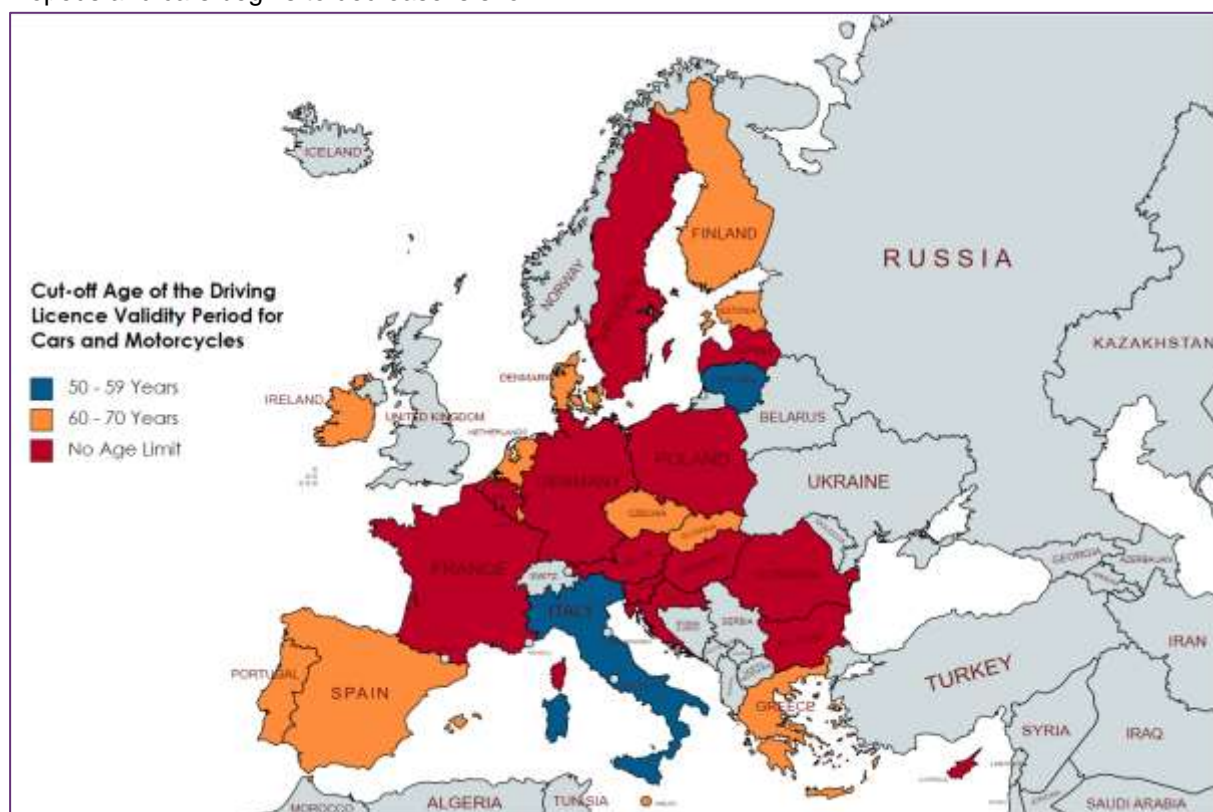
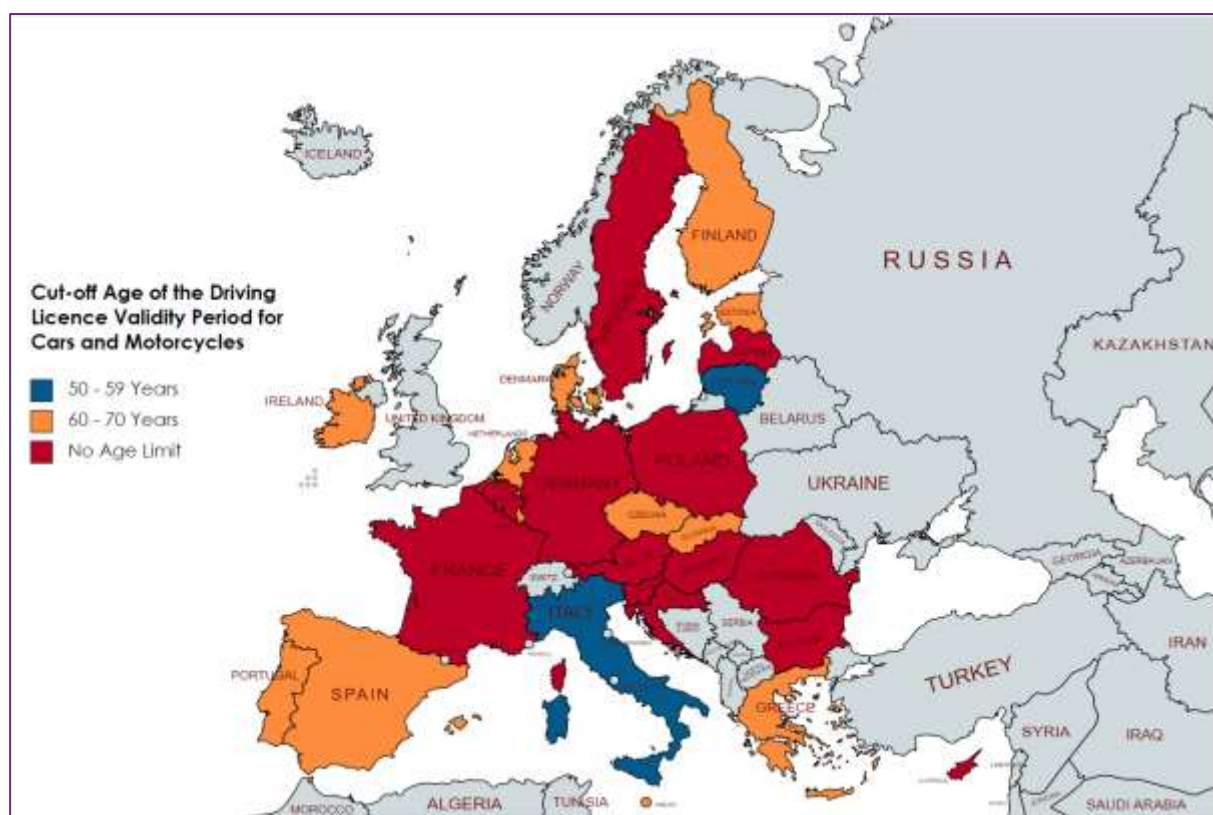


Figure 2 below:



**Figure 2:** EU benchmark Countries' Cut-off age of the Validity period

There are 12 countries that do not have a validity period age limit. This is largely because most of the EU benchmark countries can allow for an EU Driving licence that is valid for life. 7 of the countries have an age limit of 65 years and 4 countries have 70 years. The age limit is lower than 65 years in 4 of the



EU benchmark countries. Slovakia and Cyprus have 63- and 60-year age limits respectively, on the validity period. Countries like Italy and Lithuania that have validity period age limits that are 50 years and 56 years of age, respectively.

Other than having age limits to the validity periods, there are other conditions that will guide the driving licence renewal process after the drivers have reached a cut-off age. For a good number of the driving licence renewal processes done before the age limit, there are no medical examinations (eye tests or fitness to drive) performed. However, after the age limit, there are conditions required to renew a driving licence and the age of the driver also determines the validity period of the renewed driving licence. Table 6 below the EU benchmark countries' requirements for renewing a driving licence after certain age has been reached.

**Table 6:** Conditions of Validity for Cars and Motorcycles

Country	Conditions of Validity		
	Age (Years)	Validity of Licence	Medical Examination
<b>Netherlands</b>	65 to 70	Until 75th Birthday	No medical examination*
	70 to 75	Maximum of 5 years	No medical examination*
	75 and older	Maximum of 5 years	Medical examination required
<b>Ireland</b>	65 to 71	A licence which will expire on the eve of your 75th birthday at the latest.	No medical examination
	72 to 74	3-year licence	No medical examination
	75 to over	3-year licence or 1 year licence (subject to certification of fitness to drive by your doctor)	Medical examination required
<b>Spain</b>	65 to 70	Renew every 5 years	Certificate of aptitude issued by the Authorised Drivers Check Centre (Centro de Reconocimiento de Conductores Autorizado) of the province of residence of the applicant with a recent photograph
	70 and older	Renew every 3 years	Certificate of aptitude issued by the Authorised Drivers Check Centre (Centro de Reconocimiento de Conductores Autorizado) of the province of residence of the applicant with a recent photograph
<b>Belgium</b>	No age limit	Hold a licence for life	If you hold a driving licence for life (i.e., one that has an unlimited validity period) issued by another EU country, you may be required to renew your licence two years after officially registering your place of residence in Belgium
<b>Denmark</b>	No age limit	if you obtained a licence with shorter validity due to your health condition or doubts about sobriety or independence to different psychoactive substances	Medical certificate issued by your own doctor if you need to renew your licence because of your age
	70 and older		to submit this if you obtained a licence with shorter validity due to your health condition or doubts about sobriety or independence to different psychoactive substances

Country	Conditions of Validity		
	Age (Years)	Validity of Licence	Medical Examination
<b>Germany</b>	No age limit	Hold a licence for life	If you hold a driving licence for life (i.e., one that has an unlimited validity period) issued by another EU country, you may be required to renew your licence two years after officially registering your place of residence in Belgium
<b>Sweden</b>	70 and older		Supplement your application with a medical declaration and proof of good eyesight, and in other cases you may need a medical certificate.
<b>Finland</b>	Up to 65	Depending on your age and the category of your driving licence	No medical report required
	70 and older		Medical report required
<b>Austria</b>	No age limit	No upper age limit for renewing a licence	You may need to present a certificate of good health to maintain your licence.
<b>Luxembourg</b>	Up to 70	Renew every 5 years	Medical examination if you are older than 60
	80 and older	Renew every 2 years	
<b>Estonia</b>	65 and older	Renew every 5 years	Medical certificate required
<b>Italy</b>	50 to 70	Renew every 5 years	Medical certificate required
	70 to 80	Renew every 3 years	Medical certificate required
	80 and older	Renew every 2 years	A medical examination by a local medical board every two years
<b>Greece</b>	No age limit	Doctors influence renewal period.	Integrated medical institution. Doctor's discretion
<b>Cyprus</b>	70 and older		A fitness to drive certificate from a medical doctor
<b>Lithuania</b>	56 to 70	Renew every 5 years	Medical certificate required
	70 and older	Renew every 2 years	Medical certificate required
<b>Poland</b>	No age limit	This period can be curtailed by a medical practitioner who performs medical examinations	Medical certificate required
<b>Portugal</b>	75 and older	Renew every 2 years	Medical certificate required
<b>Slovakia</b>	Up to age 63	Renew every 5 years	Medical certificate required
<b>Hungary</b>	Up to age 65	Violations recorded during the validity of their expired licences, will be issued renewed licences that are only valid for five (5) years.	Go to the GP for a medical examination then the local
<b>Romania</b>	Up to 63		
<b>Bulgaria</b>	Up to 60	Anyone with a disability that affects their ability to drive to 5-years	Medical certificate which demonstrates your psychological and physical fitness to drive

In Greece, the driving licence renewal process is integrated medical institution and the doctors can influence the renewal validity period. In Hungary, traffic violations can also affect the licence renewal validity period. In Sweden, there one must submit proof of good eyesight as well as a medical certificate. From the table above, most of the EU benchmark countries require applicants after a certain age to provide a medical certificate to support their driving licence renewal process.

### 3.1.3 Validity Period for Heavy Vehicles

In some of the EU benchmark countries the vehicle types, driving licence codes (categories) and professional driving permit will also influence the validity period of a driving licence. The validity period in these EU countries is typically 5 years for heavy vehicles.

Thirteen of EU benchmark countries have a different validity period for light and heavy vehicles. The different validity periods allow for more reassessment and testing to be administered to drivers responsible for goods and passengers. The countries that have a 5-year validity period for the different categories are shown in the Figure 3 below:



**Figure 3:** 5-Year Validity Period for Heavy Vehicles

Finland, Sweden, France, Estonia, Italy, Slovakia and Croatia (in purple) follow Annex 6 1968 Vienna UN Convention on Road Traffic categories described in Chapter **Error! Reference source not found.** REF\_Ref101342519 \h \\* MERGEFORMAT **Error! Reference source not found.**, ensuing a 5-year validity period for driving licences of categories C and upwards.

Poland and Greece (in orange) have 5-year validity period heavy vehicles. The renewal of these driving licences is dependent on medical and mental health certificate in Poland and doctor's discretion in Greece, because of the integration with the medical institution. In Poland there is also a 5-year validity period for professional drivers just like in Latvia (in pink). In Latvia a medical certificate is required for the renewal process whilst in Poland the period depends on when they complete their required periodic training.

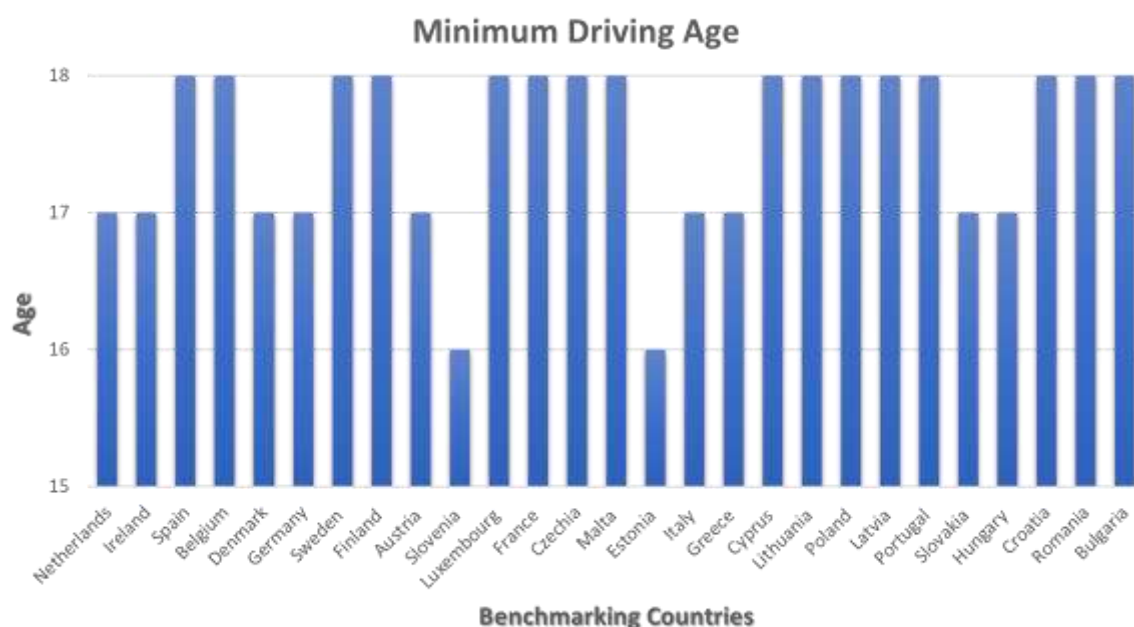
Ireland, Denmark, and Cyprus (in turquoise), have a 5-year validity period for trucks and buses. In Ireland, a maximum of five years is given which expires before the driver turns 75 years. Denmark has an age limit for the driving licence renewal. The validity periods of the truck and buses after the age of 70 years, for Denmark is shown in the Table 7 below:

**Table 7:** Denmark Driving Licence Validity

Age (Years)	Validity of Licence
70	4 years
71	3 years
72 to 79	2 years

### 3.1.4 Legal Driving Age for Cars and Motorcycles

The legal driving age in the EU benchmark countries highlights the minimum age in which a driver qualifies for a driving licence. The age of a driver can affect the validity period of a driving licence. The minimum driving age is shown in Figure 4 below.



**Figure 4:** Minimum Driving Age

Countries like Slovenia and Estonia have the minimum driving age starting at 16 years for light vehicles like cars and mopeds. The graph above shows that the average minimum age for eligibility for a driving licence is mostly 17 and 18 years. This is the representative age in which most drivers can take a theory test and a driving test that measures skills and behaviour, just like in South Africa. The average age is older than 16 years in most countries because of concerns around teenage driving safety. In addition to safety, for heavier vehicles, the minimum driving age is higher in the EU benchmark countries because of the weight of the vehicles and emotional maturity of the driver.

### 3.1.5 Materials used for Driving Licences

The materials used for the driving licences determine the validity period as well, based on the durability of the materials. In the EU benchmark countries, the materials that is used to make driving licences is shown in the Table 8 below.

**Table 8:** Materials Used to Make Driving Licences

Country	Material
Austria	Polycarbonate
Belgium	polycarbonate, credit card style
Bulgaria	polycarbonate
Czechia	Polycarbonate
Denmark	Plastic card
Estonia	100% Polycarbonate
Finland	Polycarbonate
France	Polycarbonate and PEC

Country	Material
Germany	Multi-layered polycarbonate
Greece	Plastic card
Hungary	Polycarbonate
Ireland	Plastic card
Italy	Polycarbonate
Latvia	Plastic Card
Luxembourg	Polycarbonate
Netherlands	Polycarbonate
Romania	Polycarbonate
Slovakia	Multilayer polycarbonate
Slovenia	Polycarbonate card
Spain	Mixed sheet of PVC and polycarbonate core. Made up of five layers: - Holographic protection layer-PVC overlay-Polycarbonate core-Special PVC overlay, laser characters-Transparent protection layer
Sweden	Polycarbonate

Source: European Commission. (2015)

Based on the 21 countries surveyed that had information on materials, polycarbonate is the most common material to produce driving licences in the EU benchmark countries. Polycarbonate is the EU requirement; however, Denmark and Greece are still using plastic cards. Polycarbonate is extensively used in several of the countries because of its security and durability characteristics as stated in 2.3.1 Driving Licence Types.

## 3.2 Accident Index

The WHO publishes road safety statistics at regular intervals, which monitors and tracks the progress and strides made in Legislations, Vehicle Standards and Post-crash Care to reduce and manage roads crashes.

The most current pre-Covid pandemic publication is the Global Status Report on Road Safety released in 2018 which is based on 2016 data.

The WHO 2018 publication provides Country / Area Profiles of each member State, entailing amongst others an estimated crash fatality rate per 100 000 population for 2016 which an indication of a country's road safety rating.

A comparison of 20 higher ranked and 20 lower ranked countries, than South Africa was undertaken, and the countries within this range are listed in below table.

**Table 9:** WHO 2018 Road Safety Ranking vs Driving Licence Validity Period

#	Country	WHO 2018 Rank	Deaths / 100 000 pop	Driving Licence Validity (years)
1	Switzerland	4	2,7	10
2	Singapore	5	2,8	5
3	Sweden	6	2,8	10
4	UK	7	3,1	10
5	Netherlands	8	2,8	10
6	Denmark	9	4,0	15
7	Germany	10	4,1	15
8	Ireland	11	5,1	10
9	Japan	12	4,1	5
10	Spain	13	4,1	10
11	Israel	14	4,2	10

#	Country	WHO 2018 Rank	Deaths / 100 000 pop	Driving Licence Validity (years)
12	Australia	21	5,6	10
13	Belgium	24	5,8	10
14	Canada	25	5,8	5
15	New Zealand	37	7,8	10
16	USA	63	12,4	6
17	Mexico	66	13,1	3
18	Argentina	73	14,0	5
19	China	107	22,6	6
20	India	117	22,6	20
-	<b>South Africa</b>	<b>135</b>	<b>25,9</b>	<b>5</b>
1	Libya	136	26,1	4
2	Niger	137	26,2	4
3	Ethiopia	141	26,7	2
4	Somalia	143	27,1	7
5	Congo	144	27,4	5
6	Kenya	148	27,8	3
7	Belize	150	28,3	3
8	Saudi Arabia	152	28,8	10
9	Lesotho	153	28,9	5
10	United Republic of Tanzania	156	29,2	3
11	Rwanda	158	29,7	5
12	South Sudan	159	29,9	5
13	Cameroon	160	30,1	5
14	Namibia	162	30,4	5
15	Malawi	164	31	1
16	Thailand	166	32,7	5
17	Central African Republic	167	33,6	1
18	Democratic Republic of the Congo	168	33,7	5
19	Zimbabwe	172	34,7	5

Driving licence card renewals in 40 countries were analysed, i.e., 20 countries with a road safety ratio (deaths per 100 000 population) better than South Africa and 20 countries that had a worse road safety rating (deaths per 100 000 population) than South Africa (WHO, 2018). The validity period in the 40 countries range from 1-20 years with an average of 6,8 years. The countries ranked above South Africa according to the WHO have an average driving licence validity period of 9,3 years and countries ranked lower than South Africa averaging 4.4 years.

It needs to be highlighted that many of the poorer road safety ranked countries are still using paper-based driving licences which would explain the lower average validity period in these countries. The average driving licence card validity period of almost 10 years in more developed countries, with better road safety ratios highly motivate and validates a longer renewal period in line with international best practice. Blindly assuming international practice without critically contrasting South Africa's context with these countries would be potentially damaging to the driving licence system.

## 4 Legislation

### 4.1 Background on the Development of the Licence Legislation

The South African licence system was initially legislated in the Provincial Road Traffic Ordinances, 1966. The provincial legislation was not uniform in the Republic. The licence codes ranged from code 01 to code 14. Licences were issued as a paper card licence. The licence cards did not expire.

The provincial ordinances were amended to require that driving licences had to be included in the identity document of the holder as a more secure mechanism than the cardboard cards. At this stage the TBVC states still had a system where driving licences were issued on cardboard cards, and this remained in force until the legislation was consolidated after 1994.

The licence codes of the provinces were consolidated and included in the regulations promulgated in terms of the Road Traffic Act, 29 of 1989 that was implemented in 1990.

In 1998 the licence codes were amended again after the SADC countries agreed to a set of uniform licence codes. The new licence codes were introduced in the Republic on 1 March 1998. The driving licence card was also introduced at the time and holders of driving licences were required to apply for the credit card format licences and have their driving licences removed from their ID documents.

Driving licences are issued indefinitely and do not expire, but the card licence that serves as an authorisation that proves a person is the holder of a licence, expires every five years. When a holder applies for a new licence, an eye test is performed to ensure the person is not disqualified to hold a licence. The holder of a licence must make a declaration on application for a new card that he or she is not disqualified to continue holding a licence.

The National Road Traffic Act, 1996 was implemented in 2000 and the licence codes promulgated in terms of the Road Traffic Act, 29 of 1989 were incorporated in the 2000- Regulations. Several amendments to the driving licence legislation were implemented over the last twenty years.

Certain amendments to the legislation were published in 2011, 2012, 2013 and 2014 but were never implemented. The detailed provisions are discussed under paragraph 5.2.

The 2011-amendments that were repealed and republished were supposed to be implemented in February 2012. The amendment was withdrawn before implementation. The proposed amendment changed the authorisation of certain licence codes. For example, the code C1 licence would not have allowed a holder to drive a code B category vehicle. As stated, this was not implemented.

The 2013- amendment changed the validity period of a driving licence card from 5 years to 10 years. It was published but not implemented.

The 2014-amendment amended contains several regulations relating to the application and issue of a driving licence. The legislation provides for a provisional licence that would apply for the first year a person has a driving licence. The provisional licence had certain restrictions attached to it and required the provisional driver to complete a logbook for all trips that must have been signed-off by a traffic officer during the 12-month period the holder was considered a provisional driver.

The National Road Traffic Amendment Bill, B7-2020 proposed an amendment to the sections 13 and 14 of the National Road Traffic Act to include provisional driving licences. The Transport Portfolio Committee rejected the amendments to these provisions in 2022 (clause 19 and 20 of the Bill). The rejection of the provisions for provisional licences will require the repeal of certain of the 2014-amendments to the regulations. Regulations 29 to 33 of the Twenty-Second Amendment to the National Road Traffic Regulations must be repealed.

## 4.2 The Status Quo on the Legislation

### 4.2.1 National Road Traffic Legislation applicable to Licences and Professional Driving Permits

The National Road Traffic Act, 1996 ('the Act') and National Road Traffic Regulations, 2000 ('the Regulations') regulate the requirements for licences.

- ▶ The relevant provisions are copied for information.
- ▶ The provisions that are currently in force are shown in italics.
- ▶ The amendments that were published but not implemented are shown in text boxes where relevant.
- ▶ Provisions relevant to validity periods of licences are highlighted in yellow.
- ▶ The validity period of a learner's licence was amended by means of a government notice in 2010. However, the correct procedure was to amend the regulation. It is suggested that the correct validity period for a learner's licence be included in the next amendment to the National Road Traffic Regulations to correct the regulation.

An excerpt of the Road Traffic Act pertinent to Issuing of Driving Licences is attached as **Annexure A: Regulation Amendment Proposed** of the report.

### 4.2.2 National Road Traffic Legislation applicable to the Promulgation of Regulations

Section 75 of the National Road Traffic Act, 1996 regulates the way regulations must be published.

Draft regulations must be published for comments for at least a four-week period.

The draft regulations must at the same time be submitted to Parliament for comment

Once comments have been received, the comments must be considered, and a final set of regulations must be submitted to the Minister for signature and publication.

An excerpt of the power of the Minister to make regulations is attached as **Annexure B: National Road Traffic Act, 93 of 1996**.

## 4.3 Proposed Process of Amendment of Legislation

### 4.3.1 Amendment of Regulations

The amendment of Regulations to provide for the extension of existing Driving Licences to 8 years for codes A, A1, B and EB and New Cards to be valid for 8 years.

This proposal will require that a set of draft regulations be published for comment providing for the validity period of driving licence cards for light motor vehicles to be valid for 8 years instead of 5 years.

The draft regulations will have to be published for four weeks for comment. The draft regulations must also be presented to Parliament for comment.

Once the comments are received, the comments must be considered, and a final set of regulations must be published and implemented.

If the presentation to Parliament can be done within the 4-week comment period, it is anticipated that this process could be finalised in three months.



This proposal will:

- ▶ Provide for new driving licences for codes A, A1, B and EB licences to be issued for a period of 8 years instead of 5 years;
- ▶ Provide for transitional provisions to accommodate existing cards; and
- ▶ May create some confusion as the expiry date on existing driving licence cards will not be correctly reflected on the card.

## 5 Conclusions

The literature review indicated that benchmarking countries have made great strides in improving the driving licence renewal process. The validity period of the driving licences in the benchmarking countries varies between 10 and 15 years. The longer validity periods allow for less pressure on the system in terms of the renewal process. In addition, there is a distinction made between the validity periods of different categories of vehicles and licences which can allow for personal drivers to have an independent renewal process that does not interfere with professional drivers. Most of the heavy vehicles have a 5-year validity period.

Although the age limits on validity are country specific, the process for driving licence renewal for most of the countries calls for the provision of medical certificates to prove fitness to drive, though there is little mention of eye tests. Most of the benchmarking countries have a minimum driving age of 17 and 18 years, which is consistent with most countries as the minimum age for obtaining a driving licence.

The most common material that is used to produce the driving licence document in the benchmarking is polycarbonate. This material can be attributed to the durability of the document. However, there is room to improve the accuracy of the above conclusions by conducting extensive research which will include more than 27 countries.

It seems to be the trend that all the signatory countries to the UN Vienna convention to some degree support the driving licence classification system whilst those countries not signatory to the Vienna convention employ their own different driving licence classification system.

In South Africa's case the driving licence codes are like the previous prescript of the UN Vienna Convention Annex 6 requirements but does not yet cater for the bus classifications D and DE. These are still intertwined with the heavy motor vehicle codes C1, C, EC1 and EC. Furthermore, while the convention Annex 6 par 9 provide for Domestic legislation that may introduce categories and subcategories of vehicle other than those listed, category C1 and C1E, D1 is specifically addressed par 8 in the convention. However, there is a potential problem with the definition of the code C1 driving licence in South Africa that allows for the operation of a vehicle with a weight up to 16 000 kilograms, while the UN convention indicates the upper weight limit to be only 12 000 kilograms.

The EU policy prescribes the minimum age for obtaining a driving licence for category D and DE to be 24 years, while in South Africa the minimum age to obtain the licence is 18 years, but with the additional requirement of a category P – Passenger PrDP which has an age restriction of 21 years.

Driving licence card renewals in 40 countries were analysed, i.e., 20 countries with a road safety ratio (deaths per 100 000 population) better than South Africa and 20 countries that had a poorer road safety rating (deaths per 100 000 population) poorer than South Africa. The validity period in the 40 countries range from 1-20 years with an average of 6,8 years. The countries ranked above South Africa according to the WHO have an average driving licence validity period of 9,3 years and countries ranked lower than South Africa averaging 4.4 years. It needs to be highlighted that many of the poorer road safety ranked countries are still using paper-based driving licences which would explain the lower average validity period in these countries.

The average driving licence card validity period of almost 10 years in more developed countries, with much better road safety ratios highly motivate and validates a longer renewal period in line with international best practice. However, blindly assuming international practice without critically contrasting South Africa's context with these countries would be potentially damaging to the driving licence system and road safety in the country.

Taking the above literature review and international benchmarking, as well as South African conditions into consideration, it is proposed to implement an average between 6.8 and 9.3 years with a licence validity period for lighter motor vehicle classes of 8 years.

## 6 Recommendations

### 6.1 Validity Period of Driving Licence Cards

It is recommended that the following be implemented:

- ▶ The validity period for vehicle classes C, C1, EC1, and EC not be amended and to remain valid for a 5 year period;
- ▶ New driving licences for codes A, A1, B and EB licences to be issued for a period of 8 years instead of 5 years;
- ▶ Provide for transitional provisions to accommodate existing cards;
- ▶ PrDP's to remain valid for a 2 year period.

#### Driving Licence Card

It is recommended that the current laminated paper driving licence card type in South Africa is replaced with a polycarbonate type driving licence that will better support the proposed 8-year duration for driving licence cards in South Africa.

### 6.2 Amendments to Regulations

#### **Amendment of Regulations to provide for the Extension of existing Driving Licences Vehicle Cards for Vehicle Codes A, A1, B and EB (motorcycle and light motor vehicles) to 8 years.**

This proposal will require that a set of draft regulations be published for comment providing for the validity period of driving licence cards for light motor vehicles to be valid for 8 years instead of 5 years.

The draft regulations will have to be published for four weeks for comment. The draft regulations must also be presented to Parliament for comment.

Once the comments are received, the comments must be considered, and a final set of regulations must be published and implemented.

If the presentation to Parliament can be done within the 4-week comment period, it is anticipated that this process could be finalised in three months.

This recommendation will:

- ▶ Provide for new driving licences for codes A, A1, B and EB licences to be issued for a period of 8 years instead of 5 years;
- ▶ Provide for transitional provisions to accommodate existing cards due to If current driving licence cards are extended to 8 years as it would create confusion with the expiry date on existing driving licence cards not be correctly reflected.

## 6.1 Recommendation for Further Research

A Full Driving Licence System review to include, but not limited to the following:

### 6.1.1 Progressive Driving Licence

A review of progressive driving licence best practice in best performing road safety related countries, to inform recommendations in the South African Context.

### 6.1.2 Learner's Licence Test

Recommendation to have a further research study to compare in more detail all aspects of the EU driving licence and learner's test with the South African K53 test (Volume 1 to 4) and review the driver study guides and expand where necessary to broaden the understanding of all the aspects. Further to investigate the inclusion of more detail on the transportation and handling of passengers, goods, and dangerous goods in the driver training guide.

### 6.1.3 Driving Licence Codes

It is recommended that the current driving licence codes in South Africa be amended to be in line with Annex 6 of the 1968 Vienna UN Convention on Road Traffic to cater for code D and DE. However, this can only be deployed once a new driving card layout is being implemented as the allocation of a bus licence code could potentially mean that a person might be able to have more than five different combinations of licence code authorisations and vehicle limitations that cannot be catered for on the current laminated format driving licence card. The current licence card only provides for a maximum for five driving licence codes to be specified.

While the ISO18013 attempts to cater for multiple different formats of the code C1 driving licence category description to provide for multiple countries, it is not necessarily in line with Annex 6 of the 1968 Vienna UN Convention on Road Traffic. It is recommended that further study be done on the correction of the category C1 and C1E driving licence, and that the age limitations as prescribed by Article 41 of the convention if held by a person under the age of 21 years (United Nations, 1968:38) and the EU be considered for future implementation.

### 6.1.4 Electronic Driving Licences

It is recommended that further investigation be done towards possible implementation of a digital non-physical driving licence in line with amongst other the data interchange requirements as prescribed in the ISO 18013 standard.

Possible development of a device that can scan and interact with Android and IOS than can read the driving licence detail from the digital driving licence, which can be used by law enforcement, organisations to verify their driver details other organisations that control access to their premises. – licence the software to these entities.

### 6.1.5 Age Limits and Eye Testing

Further research is recommended, in the South African context, to assess best practices in developed countries regarding age limits on the validity for driving licence renewal as well as eye tests with medical certification to prove fitness to drive.

### 6.1.6 Socio and Economic Conditions

Conduct detailed research into all aspects of South African socio and economic factors that affect road safety and ultimately how the NRSS pillar 4 can be strengthened with a strong driving licence system.

## 7 References

(TTTFP). Rwanda Final Report. Tripartite Transport & Transit Facilitation Programme.

America Optometric Association. (2022, April 19). *Adult Vision: 41 to 60 Years of Age*. Retrieved from America Optometric Association: <https://www.aoa.org/healthy-eyes/eye-health-for-life/adult-vision-41-to-60-years-of-age?sso=y#:~:text=Middle%2Daged%20adults%20will%20begin,and%20working%20on%20the%20c>omputer.

American Association of Motor Vehicle Administrators. (2022). Joining Forces. *Information for Motor Vehicle & Law Enforcements Officials Move Magazine*:

AOA. (2022, April 12). Adult Vision: 41 to 60 Years of Age. Retrieved from Aoa.org: <https://www.aoa.org/healthy-eyes/eye-health-for-life/adult-vision-41-to-60-years-of-age?sso=y>

Biza, M., Mossie, A., Woldemichael, K., & Gelaw, Y. (2013). Visual impairment and road traffic accidents among drivers in Jimma Town, Southwest Etopia. *Ethiop Med J*, 123-32.

Boadi-Kusi, S. B., Mathebula, S., & Kok, J. (2016). Critical Review of vision fitness testing within the South African Driving License Testing and road safety context. *Journal of Applied Quantitative Methods*, 50-62.

Cashwell, G. (1970). Visual Function in relation to road accidents. *The British Journal of Accident Surgery*, 8-10.

Driver and Vehicle Standards Agency. (2010). *Organisations*. Retrieved from United Kingdom Government: <https://www.gov.uk/government/organisations/driver-and-vehicle-standards-agency>

European Commission. (2015). *Driving licence handbook European Union and European Economic Area*. Luxembourg: Publications Office of the European Union.

European Commission. (n.d.).

European Union. (2006). Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on Driving Licences (Recast). *Commission Directive 2011/94/EU*.

Eurostat. (n.d.). *Database*. Retrieved from Eurostat Yourkey to European statistics: <https://ec.europa.eu/eurostat/data/database>

Governors Highway Safety Association. (n.d.). *Governors Highway Safety Association The States' Voice on Highway Safety*. Retrieved from <https://www.ghsa.org/>

Hawkins, B. (2018). *Australia and New Zealand Vehicle Registration and Driver Licensing Overview 2017-18 A Transnational Survey of Laws, Procedures and Trends*. Sydney: Austroads Ltd.

New Zealand Ministry of Transport. (2010). *Evaluation of the Graduated Driver Licensing System*. New Zealand Government.

New Zealand Ministry of Transport. (2020). *New Zealand Ministry of Transport Driver Licensing System*. Retrieved from New Zealand Ministry of Transport: <https://www.nzta.govt.nz/driver-licences/>  
NEWS19. (2019). *Digital driver's licenses are not widely recognized*. Huntsville: News19.

OUTA. (2022). Motivation for extension of drivers license renewal period from 5 to 10 years is South Africa. Gauteng: Organisation undoing tax abuse.

Owesley, C., & McGwin Jr, G. (2010). Vision and driving. *Vision Research*, 2348-2361.  
Queensland Government. (2022).

RTMC (2020). *State of road safety report: 1 Jan 2020 – 31 December 2020* 9 4.2

South African Department of Transport. (1992). *National Transport Policy White Paper*. Tshwane: South African Department of Transport.  
South African Department of Transport. (2005). *Department of Transport K53 Practical driving test for motor vehicle drivers*.

UN Convention of Road Traffic Vienna. (1968). TRANSPORT AND COMMUNICATIONS. *Convention on Road Traffic*. Vienna: United Nations.

United Kingdom Government. (n.d.). Retrieved from <https://www.gov.uk/>  
United Nations Development Programme. (2020). *Human Development Report 2020 The next frontier The next frontier*. New York: United Nations Development Programme.

Velazco, C. (2021). *Digital driver's licenses take the sting out of forgetting your wallet. Here's how they work*. Washington DC: The Washington Post.

Waka Kotahi New Zealand Transport Agency. (n.d.). *Waka Kotahi New Zealand Transport Agency Safety*. Retrieved from Waka Kotahi New Zealand Transport Agency: <https://www.nzta.govt.nz/safety/>

<https://www.mrrb.bg/en/road-traffic-act/>

<http://bulgarianplates.com/bulgarian-driving-licence/#:~:text=The%20Bulgarian%20driving%20licence%20has%20validity%20of%2010%20years>

<https://bmchealthservres.biomedcentral.com/articles/10.1186/s12913-020-05621-8>

<https://euagenda.eu/upload/publications/untitled-96809-ea.pdf>  
[https://www.bing.com/search?q=poland+driving+license+validity+period&qsn=&form=QBRE&msbsrknk=4\\_4\\_0&sp=-1&pq=poland+driving+license+validity+period&sc=4-40&sk=&cvid=D4CD7852E8C9438B9DA23EFC1F492723](https://www.bing.com/search?q=poland+driving+license+validity+period&qsn=&form=QBRE&msbsrknk=4_4_0&sp=-1&pq=poland+driving+license+validity+period&sc=4-40&sk=&cvid=D4CD7852E8C9438B9DA23EFC1F492723)

<https://farfaras.gr/en/documents-handling/renewal-of-license/>

<https://www.angloinfo.com/how-to/greece/transport/driving-licences/european-driving-licence>

<https://transportstyrelsen.se/en/road/Driving-licences/i-have-a-driving-licence/#:~:text=You%20must%20renew%20your%20driving%20licence%20within%20five,will%20always%20automatically%20send%20you%20the%20renewal%20documents>

<https://transportstyrelsen.se/en/road/Driving-licences/i-have-a-driving-licence/#:~:text=You%20must%20renew%20your%20driving%20licence%20within%20five,will%20always%20automatically%20send%20you%20the%20renewal%20documents>.

<https://transportstyrelsen.se/en/road/Driving-licences/i-have-a-driving-licence/#:~:text=You%20must%20renew%20your%20driving%20licence%20within%20five,will%20always%20automatically%20send%20you%20the%20renewal%20documents>

[https://www.google.com/search?q=drivers+license+validity+period+netherlands&client=firefox-b-d&ei=K9nnYaLuEofdgQb52qCwCA&ved=0ahUKEwjir\\_TLv731AhWHbsAKHXktCIYQ4dUDCA0&uact=5&oq=drivers+license+validity+period+netherlands&gs\\_lcp=Cgdnnd3Mtd2l6EAMyCAgHEBYQHRAeMgglIRAWEB0QHjoHCAAQRxCwAzoKCAAQRxCwAxDJAzoECCEQCKoECEEYAEoECEEYAFCDKljGOWCIO2gCcAJ4AIAB2AKIAaAVkgEFMi04LjKYAQCgAQHIAQjAAQE&sclient=gws-wiz](https://www.google.com/search?q=drivers+license+validity+period+netherlands&client=firefox-b-d&ei=K9nnYaLuEofdgQb52qCwCA&ved=0ahUKEwjir_TLv731AhWHbsAKHXktCIYQ4dUDCA0&uact=5&oq=drivers+license+validity+period+netherlands&gs_lcp=Cgdnnd3Mtd2l6EAMyCAgHEBYQHRAeMgglIRAWEB0QHjoHCAAQRxCwAzoKCAAQRxCwAxDJAzoECCEQCKoECEEYAEoECEEYAFCDKljGOWCIO2gCcAJ4AIAB2AKIAaAVkgEFMi04LjKYAQCgAQHIAQjAAQE&sclient=gws-wiz)

<https://international.kk.dk/live/transport-and-parking/driving-in-copenhagen/danish-driving-licences>

<https://www.iamexpat.de/expat-info/driving-germany/driving-licence>

[https://www.citizensinformation.ie/en/travel\\_and\\_recreation/motoring\\_1/driver\\_licensing/renewing\\_a\\_full\\_driving\\_licence.html](https://www.citizensinformation.ie/en/travel_and_recreation/motoring_1/driver_licensing/renewing_a_full_driving_licence.html)

[https://en.wikipedia.org/wiki/Driving\\_licence\\_in\\_Spain](https://en.wikipedia.org/wiki/Driving_licence_in_Spain)

<https://ajokortti-info.fi/en/changes-driving-licence/renewing-your-driving-licence>

<https://www.expatica.com/at/living/transportation/austrian-driving-license-88826/?msclkid=bfe37fe4bc9111ecb063260a8d2a8700#renewing>

<https://www.angloinfo.com/how-to/france/transport/driving-licences/french-driving-licences?msclkid=ccc1c44bbc9311ecb0cca58d6e1f5500>

<https://www.angloinfo.com/how-to/italy/transport/driving-licences/renewing-a-licence>

<https://www.expatica.com/be/living/transportation/driving-licenses-belgium-107658/>

<https://www.eesti.ee/en/traffic/vehicles-and-right-to-drive/driving-licence#replacingadrivinglicence4>

<https://www.transport.gov.mt/land/driving-licence/renewing-your-driving-licence-787>

<https://www.slov-lex.sk/pravne-predpisy/SK/ZZ/2009/8/20200409#>

<https://guichet.public.lu/en/actualites/2019/avril/29-permis-renouvellement.html?msclkid=ea7b0c65bc1c11eca8875f9e4d01991d>

<https://www.worldbank.org/en/country/southafrica/overview#1>

How do I renew my Portuguese driving Licence? – Ulmerstudios

Hungarian Driving Licences - Hungary - Angloinfo

[https://www.magyarorszag.hu/szuf\\_ugyleiras?id=d34aa3a7-37da-47c9-86e4-43ae8c98afc1&\\_n=first\\_issue\\_and\\_renewal\\_of\\_a\\_driving\\_licence](https://www.magyarorszag.hu/szuf_ugyleiras?id=d34aa3a7-37da-47c9-86e4-43ae8c98afc1&_n=first_issue_and_renewal_of_a_driving_licence)

<https://www.regitra.lt/en/services/driving-licences/i-wish-to-renew-a-driving-licence-that-has-expired>

[https://www.wikiprocedure.com/index.php/Croatia\\_-\\_Renewal\\_of\\_Drivers\\_License](https://www.wikiprocedure.com/index.php/Croatia_-_Renewal_of_Drivers_License)

<https://gov.hr/en/driving-licence-general-information/520>

<https://mup.gov.hr/aliens-281621/information-regarding-driving-licence-and-road-traffic/croatian-driving-licence/286629>

<https://www.angloinfo.com/how-to/greece/transport/driving-licences/european-driving-licence>

<https://farfaras.gr/en/documents-handling/renewal-of-license>



## Annexure A

### Regulation amendment proposed

#### DEPARTMENT OF TRANSPORT

#### NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996)

#### PUBLICATION OF THE NATIONAL ROAD TRAFFIC REGULATIONS FOR COMMENTS

The Minister of Transport intends to amend the National Road Traffic Regulations, 2000, and acting in terms of section 75(6) of the National Road Traffic Act, 1996 (Act No. 93 of 1996) herewith publish the regulations in the Schedule for comments. All interested parties who have any objections, inputs or comments to the proposed amendments are called upon to lodge their objections, inputs, or comments, within four weeks from the date of publication of this Notice to:

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#### SCHEDULE

##### Definition

1. In this Schedule "the Regulations" means the National Road Traffic Regulations published in Government Notice No. R. 225 of 17 March 2000, as amended by Government Notice No's. R. 761 of 31 July 2000, R. 941 of 22 September 2000, R. 726 of 3 August 2001, R. 2116 of 5 October 2001, R. 779 of 4 June 2002, R. 1341 of 25 September 2003, R. 881 of 23 July 2004, R. 871 of 2 September 2005, R. 1066 of 23 November 2005, R. 1318 of 2 December 2005, R. 1319 of 2 December 2005, R. 891 of 4 September 2006, R. 964 of 29 September 2006, R. 404 of 4 May 2007 and R. 865 of 28 September 2007, R. 589 of 27 May 2009, R. 359 of 12 May 2010, R. 541 of 29 June 2011, R. 209 of 9 March 2012, R. 758 of 9 October 2013, R. 890 of 19 November 2013, R. 846 of 31 October 2014, R.188 of 19 February 2016, R.1408 of 11 November 2016, R.1713 of 2 February 2022 and R.1750 of 11 February 2022.

## Amendment of Regulation 100 of the Regulations

2. Regulation 100 of the Regulations is amended by the insertion of the following subregulations after subregulation (5):

“(6) Subject to subregulations (5) and (6) of regulation 108, a driving licence card shall be an authorisation in terms of section 12(b) of the Act, for the period of validity of such card.

“(7) A driving licence card that is valid on the date of implementation of this regulation for code A1, A, B and EB licences shall be valid for a further period of five years from the date of expiry on such card.

“(8) The holder of a driving licence card contemplated in subregulation (7) that has become illegible or has been damaged to such extent that the lamination of such card is no longer protecting the card must apply for a new card in the manner contemplated in regulation 108(5)(b) if such holder wishes to use such card as an authorisation to operate a motor vehicle on a public road.”.

## Amendment of Regulation 101 of the Regulations

3. Regulation 101 of the Regulations is amended by the substitution for the regulation of the following regulation:

### **“101. Period of validity of learner’s licence and driving licence**

(1) The period of validity of a learner’s licence issued or deemed to be issued in terms of section 17 of the Act shall be **[18 months]** 24 months from the date of examination and test referred to in section 17 (2) of the Act.

(2) The period of validity of a driving licence issued or deemed to be issued in terms of section 18 of the Act shall be indefinite, unless such licence has been suspended or cancelled in terms of the Act or the Administrative Adjudication of Road Traffic Offences Act, 46 of 1998.”.

## Amendment of Regulation 101 of the Regulations

4. Regulation 108 of the Regulations is amended by the amendment for paragraph (a) of subregulation (5) of the following paragraph:

“(5) (a) Subject to regulation 101(2)-

- (i) a driving licence card for code A1, A, B and EB licence shall expire **[five]** 8 years from the date on which it has been ordered from the Card Production Facility: Provided that where a person has applied for a new driving licence card in the manner contemplated in paragraph (b) on or before the expiry date of the driving licence card held by such person, the new driving licence card shall expire **[five]** 8 years from the date after the expiry date of the driving licence card held by such person; and
- (ii) a driving licence card for code C1, C, EC1 and EC licence shall expire five years from the date on which it has been ordered from the Card Production Facility: Provided that where a person has applied for a new driving licence card in the manner contemplated in paragraph (b) on or before the expiry date of the driving licence card held by such person, the new driving licence card shall expire five years from the date after the expiry date of the driving licence card held by such person

## Short title and commencement

5. These Regulations are published for comment.

## Annexure B

### National Road Traffic Act, 93 of 1996

#### **National Road Traffic Act, 93 of 1996**

##### **12. Driver of motor vehicle to be licenced**

*No person shall drive a motor vehicle on a public road—*

- (a) except under the authority and in accordance with the conditions of a licence issued to him or her in terms of this Chapter or of any document deemed to be a licence for the purposes of this Chapter; and*
- (b) unless he or she keeps such licence or document or any other prescribed authorisation with him or her in the vehicle.*

#### **National Road Traffic Regulations, 2000**

##### **100. Authorisation which serves as licence in terms of section 12 of Act**

*(1) If—*

- (a) a person's driving licence card has been stolen, lost, destroyed, or defaced; or*
- (b) a driving licence testing centre has authorised that a driving licence be issued to a person, and the driving licence card is being processed by the Card Production Facility, a duly completed form TDL as shown in Schedule 2, issued by an examiner for driving licences or a person duly authorised to do so, shall be an authorisation in terms of section 12 of the Act, for a period of six months from its date of issue, or until the date on which the person to whom it was issued, receives his or her original or duplicate driving licence card, whichever date is the earlier.*

....

*(5) (a) Subject to paragraphs (b) and (c), a copy of an affidavit regarding the theft, loss, destruction, or defacement of a licence made at a driving licence testing centre or police station and which—*


- (i) contains the official date stamp of the authority concerned.*
- (ii) contains the—*
  - (aa) full names.*
  - (bb) identity number or date of birth.*
  - (cc) full address; and*
  - (dd) code of licence with all endorsements and restrictions applicable thereto, of the deponent; and*
- (iii) describes the circumstances under which the licence was stolen, lost, destroyed, or defaced, shall be an authorisation in terms of section 12 of the Act, for a period of three days after the date on which it was issued.*
- (b) If the affidavit referred to in paragraph (a) is made at a police station, such affidavit shall also contain the crime administration number (CAS) or the occurrence book number (OB), as the case may be.*
- (c) The driving licence testing centre or police station at which an affidavit is made shall retain the original affidavit for record purposes.*

## 101. Period of validity of learner's licence and driving licence

- (1) The period of validity of a learner's licence issued or deemed to be issued in terms of section 17 of the Act shall be 18 months from the date of examination and test referred to in section 17 (2) of the Act.
- (2) (a) The period of validity of a driving licence issued or deemed to be issued in terms of section 18 of the Act shall be indefinite unless such licence has been suspended or cancelled in terms of the Act.  
(b) (i) The holder of a driving licence that was issued before 1 March 1998, who wishes to substitute such licence as contemplated in section 19 of the Act, shall apply for such substitution before or within the period determined by the Minister by notice in the Gazette.  
(ii) Different periods may be determined under item (i) in respect of licence holders whose surnames start with different letters of the alphabet, or whose dates of birth fall in different months.

No. R.134

17 February 2010



**NATIONAL ROAD TRAFFIC ACT, 1996 (ACT NO. 93 OF 1996)**

**EXTENSION FOR THE VALIDITY PERIOD OF A LEARNER'S LICENCE**

I, **S'busiso Joel Ndebele**, Minister of Transport, acting in terms of Section 75 read with regulation 101 of the National Road Traffic Regulations, 2000 under the National Road Traffic Act, 1996 (Act No. 93 of 1996), hereby extend the period of validity of a learner's licence from 18 months to 24 months.

(Signed)


**S'busiso Joel Ndebele**  
**MINISTER OF TRANSPORT**  
(Dated: 17 February 2010)

## 108. Manner of issue of driving licence

.....

- (5) (a) Subject to regulation 101 (2) (a), a driving licence card shall expire five years from the date on which it has been ordered from the Card Production Facility: Provided that where a person has applied for a new driving licence card in the manner contemplated in paragraph (b) on or before the expiry date of the driving licence card held by such person, the new driving licence card shall expire five years from the date after the expiry date of the driving licence card held by such person.

[Para. (a) substituted by r. 19 (b), GNR.881 w.e.f. 23 July 2004 and **substituted by r. 4, GNR.890 of 19 November 2013 w.e.f. a date to be determined by the Minister.**]



**New wording inserted by the Twenty First Amendment to the Regulations – G.N.R. 19 November 2013 – Amendment not in force.**

“(5) (a) subject to regulation 101 (2) (a), a driving licence card shall expire ten years from the date on which it has been ordered from the Card Production Facility: Provided that where a person has applied for a new driving licence card in the manner contemplated in paragraph (b) on or before the expiry date of the driving licence card held by such person, the new driving licence card shall expire ten years from the date after the expiry date of the driving licence card held by such person.”

- (b) The holder of a driving licence card may apply for a new card in the manner contemplated in regulation 109 and the new card shall be authorised and issued in the manner contemplated in regulation 109 (3).
- (6) (a) Notwithstanding the provisions of subregulation (5) (a), where a person has applied for a new driving licence card in the manner contemplated in subregulation (5) (b) on or before the expiry date of the driving licence card held by such person and a driving licence of the person concerned has not been suspended or cancelled, that card shall remain valid until

*the new driving licence card has been issued in terms of subregulation (3) but not for more than three months after the expiry date of such driving licence card.*

*(b) The provisions of paragraph (a) shall only apply if the holder of the driving licence card is in possession of the driving licence card previously issued to him or her and proof of the fees paid in terms of regulation 109 (2) (c) for a new driving licence card as contemplated in regulation 108 (1).*

*[Sub-r. (6) added by r. 33 (c), GNR.1341 w.e.f. 25 September 2003 and substituted by r. 19 (c), GNR.881 w.e.f. 23 July 2004.]*



**Regulation 108 has been substituted by GNR.846 of 31 October 2014 but is NOT IN FORCE.**

### **108. Manner of issue of a driving licence**

...

*(5) (a) Subject to regulation 101 (2) (a), a driving licence card shall expire five years from the date on which it has been ordered from the Card Production Facility: Provided that where a person has applied for a new driving licence card in the manner contemplated in paragraph (b) on or before the expiry date of the driving licence card held by such person, the new driving licence card shall expire five years from the date after the expiry date of the driving licence card held by such person.*

*(b) The holder of a driving licence card may apply for a new card in the manner contemplated in regulation 109 and the new card shall be authorised and issued in the manner contemplated in regulation 109 (3).*

*(c) If an applicant's application referred to in paragraph (b) relates to code EC1 or EC driving licence and the applicant is disqualified in terms of regulation 102 from holding such new licence, but is not so disqualified from holding a new code EB driving licence, such applicant's application shall for the purposes of regulation 102 be deemed to be an application for a new code EB driving licence, and that applicant shall be issued with a new licence of that code.*

*(d) If an applicant's application referred to in paragraph (b) relates to a code C1 or C driving licence and the applicant is disqualified in terms of regulation 102 from holding such new licence, but is not so disqualified from holding a new code B driving licence, such applicant's application shall for the purposes of regulation 102 be deemed to be an application for a new code B driving licence, and that applicant shall be issued with a new licence of that code.*

*(6) (a) Notwithstanding the provisions of subregulation (5) (a), where a person has applied for a new driving licence card in the manner contemplated in subregulation (5) (b) on or before the expiry date of the driving licence card held by such person and a driving licence of the person concerned has not been suspended or cancelled, that card shall remain valid until the new driving licence card has been issued in terms of subregulation (3) but not for more than three months after the expiry date of such driving licence card.*

*(b) The provisions of paragraph (a) shall only apply if the holder of the driving licence card is in possession of the driving licence card previously issued to him or her and proof of the fees paid in terms of regulation 109 (2) (c) for a new driving licence card as contemplated in regulation 108 (1).*

**[R. 108 substituted by r. 31, GNR.846 w.e.f. a date to be determined by the Minister by Notice in the Government Gazette.]**

### **120. Professional driving permit remains in force after application**

*(1) Notwithstanding the provisions of regulation 122 (1), where the holder of a professional driving permit has applied for a new professional driving permit in the manner contemplated in regulation 122 (2) on or before the expiry date of the professional driving permit held by such person and*

*the professional driving permit or a driving licence of the person concerned has not been suspended or cancelled, that permit shall remain valid until the new professional driving permit has been issued in terms of regulation 119 (3) or until such holder is notified that his or her application for a new professional driving permit has been refused in terms of regulation 125 (4) but not for more than four months after the expiry date of such professional driving permit.*

*(2) The provisions of subregulation (1) shall only apply if the holder of the professional driving permit is in possession of the professional driving permit previously issued to him or her and proof of the fees paid in terms of regulation 118 (2) (a) for a new professional driving permit as contemplated in regulation 122 (2).*

*[R. 120 substituted by r. 37, GNR.1341 w.e.f. 25 September 2003 and by r. 28, GNR.881 w.e.f. 23 July 2004.]*

## **122. Period of validity of professional driving permit, re-application, and re-issuing**

*(1) A professional driving permit shall be valid for a period of 24 months from the date of authorisation thereof as referred to in regulation 119 (1) (a) unless the permit or a driving licence of the person concerned has been suspended or cancelled: Provided that where a person has applied for a new professional driving permit in the manner contemplated in subregulation (2) on or before the expiry date of the professional driving permit held by such person, the new professional driving permit shall be valid for a period of 24 months from the date after the expiry date of the professional driving permit held by such person.*

*[Sub-r. (1) substituted by r. 29, GNR.881 w.e.f. 23 July 2004, amended by r. 26, GNR.404 w.e.f. 4 May 2007.]*

*(2) Regulations 117, 118 and 119 apply to the re-application and re-issuing of a professional driving permit.*

## Annexure C

### Power of Minister to make regulations

#### **75. Power of Minister to make regulations**

- (1) *The Minister may after a decision has been taken in the Shareholders Committee make regulations not inconsistent with this Act, in respect of any matter contemplated, required or permitted to be prescribed in terms of this Act and generally regarding the operation of any vehicle on a public road, the construction and equipment of such vehicle and the conditions on which it may be operated, and in any other respect for the better carrying out of the provisions or the achievement of the objects of this Act, and in particular, but without derogating from the generality of this subsection, regarding—*

.....

- (6) *Before the Minister makes any regulation, the Minister must cause a draft of the proposed regulations—*
- (a) *to be referred to Parliament for comment; and*
  - (b) *at the same time, to be published in the Gazette together with a notice calling upon all interested persons to lodge in writing, and within a period specified in the notice, but not less than four weeks as from the date of publication of the notice, any objections, or representations which they would like to raise or make, with the Director-General for submission to the Minister:*

*Provided that, if the Minister thereafter decides to alter the draft regulation as a result of any objections or representations submitted thereafter, it shall not be necessary to publish such alterations before making the regulations.*