

SUBMISSION

Considering changes
to light vehicle
inspections

A combined submission from:

Bus & Coach Association
Motor Industry Association
National Road Carriers
Rural Contractors New Zealand
Transporting New Zealand



About the submitters

This submission is made on behalf of the following automotive associations, in a coalition coordinated by national road freight association Ia Ara Aotearoa Transporting New Zealand. All associations have provided input and insights supported by the experience and expertise of our respective members.

- Bus and Coach Association
- Motor Industry Association
- National Road Carriers
- Rural Contractors New Zealand

This transport coalition recognises the importance our associations place on productivity, safety, and efficiency. It highlights the importance that our members place on the land transport rules supporting the adoption of innovative and efficient heavy vehicle technologies. New Zealand's transport sector employs 108,000 people and contributes 4.8 percent of New Zealand's GDP.

There is nothing confidential in our submission and we permit it to be published in full.

We would appreciate the opportunity to discuss our submission with NZ Transport Agency Waka Kotahi and Ministry of Transport directly. The lead author and coordinator of this submission can be contacted at the details below:

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 BUS & COACH ASSOCIATION NEW ZEALAND	 MOTOR INDUSTRY ASSOCIATION INCORPORATED
The BCA represents 230 operator and supply chain companies, with 12,000 passenger service vehicles contributing \$900 million annually to GDP.	The MIA represents official importers and distributors of new motorcycles, light and heavy vehicles, representing 91 marques and accounting for 98% of all new vehicle sales.
 NATIONAL ROAD CARRIERS (Inc)	 Rural Contractors NEW ZEALAND
NRC represents 1500 supply chain company members, who collectively operate over 16,000 trucks throughout New Zealand.	
 Ia Ara Aotearoa Transporting NEW ZEALAND	
Transporting New Zealand is a national association representing over 1,200 road freight businesses (with a combined fleet of 14,000) and supply chain partners across the country.	

Submission on considering changes to light vehicle inspections

Proposed WoF frequency changes

- 1 We support the proposed WoF frequency changes as tabled. These changes better align NZ with the periodic inspection frequencies in other jurisdictions, notably Europe where biennial inspections are the norm.
- 2 As noted in the discussion document, NZ has the most frequent private light vehicle safety inspection regime in the world, with a large sub-section of the light vehicle fleet still required to be tested as often as 6-monthly. The relatively higher average age of NZ's light vehicle fleet in comparison to other countries is not sufficient grounds for more frequent inspections. The percentage of death and serious injury crashes (DSI) where a vehicle defect was a causal factor is very low (1.7% in 2023) and on par with other jurisdictions and yet our road toll is higher than other countries with less frequent inspections (or none at all in the case of most Australian states and Canadian provinces). This is reinforced by the document's conclusion that the costs of our frequent inspection regime outweigh the safety benefits.

Proposed CoF A frequency changes

- 3 While we support the proposal for rental vehicles under 5 years old (from year of first registration regardless of country) to only undergo a CoF A once a year instead of 6-monthly, we recommend this proposal go further and apply to all light vehicles subject to a CoF A and under 5 years of age, i.e. including light passenger vehicles for hire and reward (taxis, rideshare and taxi vans).
- 4 We propose this for similar arguments that apply to rental vehicles; namely that these are late-model vehicles which will still be under warranty and subject to a factory servicing regime and thus periodically inspected for safety equipment condition amongst others.
- 5 Additionally though, this proposal would create an uneven playing field, for example rental passenger vans (under 5 years of age) which are hired to undertake school transport duties would only be subject to an annual CoF A whilst an identical van owned by a school bus operator to perform the same duties, would still be required to be inspected 6-monthly. The same inequity applies to any rental vehicle under 5 years hired for 'hire and reward' passenger carrying duties e.g. tourism, charter or rideshare.

Vehicle inspection scope

- 6 We support extending the scope of both the WoF and CoF A inspections to include checking ADAS warning lights or fault indicators.

Enforcement and education

- 7 Following the last review of NZ's WoF regime in 2013, which introduced annual inspections for private light vehicles manufactured from 2000 onwards, the-then government made a commitment to also increase roadside police enforcement and public education around owners' responsibilities to ensure vehicles are in roadworthy condition at all times. This was realised in the form of NZTA's short-lived (and catchy) '[TWIRL](#)' campaign, whilst greater Police enforcement never materialised due to a lack of dedicated funding.
- 8 We support the principle of increased education and enforcement provided there is some real commitment and resourcing behind it. It has been surmised that New Zealanders general lack of self walkaround checking of vehicles is due in part to the frequency of our mandated inspections lulling Kiwis into a false sense of security. It will take time to shift this attitude, through ongoing education and enforcement. To that end, it may be premature to consider raising penalties (and adding demerits) for non-compliance to the higher levels seen in other jurisdictions until there is evidence of greater awareness among the motoring public of regularly checking their own vehicle.
- 9 As part of any education campaign, we would also encourage reminders that it is a legal requirement that any vehicle being sold must have a WoF less than one month old (this is the default requirement in most Australian states). This is not always followed (for private sales), nor enforced, and can be easily opted out of by stating and agreeing the vehicle is 'as is, where is'. Buyers of used vehicles should be encouraged to insist on a fresh WoF, and why this is important, not unlike the long-term campaigns to educate motorists about the importance of checking prospective vehicles' safety ratings and fuel economy ratings before buying.
- 10 Whilst the discussion document discounted it, we **recommend** NZTA use ANPR and existing safety cameras to monitor and enforce WoF compliance (or at the very least issue warnings to vehicle owners, perhaps electronically to reduce administration costs to NZTA).