Ia Ara Aotearoa Transporting NEW ZEALAND

DECEMBER 2025

SUBMISSION

Land Transport Rules Reform Phase 1: Heavy Vehicle Productivity

A combined submission from:

Bus & Coach Association
Institute of Road Transport Engineers NZ
Motor Industry Association
National Road Carriers
Rural Contractors New Zealand
Transporting New Zealand
Truck-Trailer Manufacturers Federation

Introduction

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
- Institute of Road Transport Engineers New Zealand
- Motor Industry Association
- National Road Carriers
- Rural Contractors New Zealand
- Truck-Trailer Manufacturers Federation

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.

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.	Rural Contractors NZ represents over 600 members employing 2,500-3,000 staff and contributing over $2 billion to GDP.
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.	

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Proposal 2 – Remove H plates: We support the proposal to remove the requirement for HPMVs to display HPMV (H) signs.

Proposal 3 – Bolster Attachment Code: We support the proposal to incorporate the Bolster Attachment Code by reference into the Heavy Vehicles Rule.

Proposal 4 – Minor amendment to definitions: We support the proposal to remove the definition of “low volume vehicle” in the Rule.

Additional industry proposals: We recommend the scope of Phase 2 be extended to include the following amendments which could help deliver meaningful productivity gains:

a. Increase the inter-vehicle axle spacing limit and remove the need for a permit. If NZTA require specific operating requirements then these should be embedded in the revised VDAM Rule.

b. Amend Section 6 of the VDAM Rule, regarding specialist vehicles, to add sucker (vacuum) trucks and crane trucks. This would allow these vehicles to apply for higher axle set limits.

c. Allow super single tyres on 50MAX and HPMV vehicles. Super singles offer superior handling and stability, in particular when the lateral distance between the suspension point is made wider. There are also environmental benefits through reduced tyre waste.

d. Increase mass and greater flexibility in quad axle set configurations.

e. Increase the gross combination mass limit for single drive tractor/truck units from 42 to 46 tonne.

f. Greater flexibility to size and weights limits to accommodate innovative vehicles, particularly environmentally friendly vehicles (BEV, dual fuel (hydrogen/diesel) etc.).

Introduction

2 In August 2023 the Ministry of Transport released the Aotearoa New Zealand Freight and Supply Chain Strategy which reports that "in 2017/2018, trucks, trains, ships and airplanes moved about 280 million tonnes of freight around New Zealand. That is around 56 tonnes per New Zealander. Moving this quantity of goods around such a small, spread-out population is highly complex."

3 In terms of the movement of freight across land transport the vast majority is moved by road. In terms of total tonnage, road freight transport accounts for 93%[1]. In terms of freight activity (tonnes-km) the 2020 KiwiRail Annual Integrated Report refers to it carrying 12 percent of New Zealand's total freight task[2]. The remaining 88 percent is undertaken on road.

4 The road transport industry has been innovative and risen to numerous challenges over the last decade, particularly in the areas of safety technology and reduced emissions. However, there have been trade-offs, particularly in increased vehicle tare weight, and therefore all other things being equal, for loads limited by maximum vehicle combination weight there has been reduced payload and loss of productivity.

5 Many international jurisdictions in Europe, Africa, North America and Australasia recognise the importance of efficient freight movements and its impact on cost of living and consequently they are improving freight productivity by reviewing vehicle size and weight limits. Those jurisdictions are trialling heavier and longer vehicles. Improving vehicle productivity helps tackle issues like emissions, driver shortage, and safety, by reducing the total number of heavy vehicles required to complete the freight task.

6 Over the last few years the road transport industry has identified a number of barriers that the current land transport rules and regulations pose to adopting innovative vehicles and constraining efficiency and productivity of freight movements. Our industry has made a suite of recommendations to NZTA on improvement opportunities.

7 Uptake of 50MAX and HPMVs continues to increase:

Heavy vehicle permits processed by year by NZTA - OIA-20286

[1] https://www.transport.govt.nz/assets/Uploads/Report/NFDS3-Final-Report-Oct2019-Rev1.pdf
[2] https://www.kiwirail.co.nz/who-we-are/publications-and-resources/annual-reports/

Year	Processed					
	Permit type					
Year	HPMV overlength	Overweight	HPMV - 50Max	Overdimension	HPMV – Higher mass	Specialist vehicle
2020	2250	9025	6237	6587	10319	16
2021	2717	9072	6818	6908	9797	42
2022	3430	10583	8127	7053	10912	21
2023	3977	10707	8603	7277	12874	13
2024	5184	12518	8825	7182	12554	12
2025 (YTD)	5789	15856	7770	6670	12501	36

8 As over half the new heavy vehicles entering the fleet are built to the HPMV Proforma standard and operate on the approved HPMV network, these vehicles are now standard vehicles so therefore should not require individual permits.

9 As the Ministry of Transport's Regulatory Impact Statement (RIS) notes, Australian studies show that vehicles meeting Performance Based Standards, which includes New Zealand's 50MAX vehicles are involved in significantly fewer crashes than conventional heavy vehicles.

10 On 19 June 2025 Transport Minister Chris Bishop produced a media release headlined "Taking the handbrake off productivity through transport rule reform". The release referred to Government progressing a bold work programme to increase productivity and efficiency through comprehensively reforming New Zealand's Land Transport Rules.

11 The Minister's release refers *"Our Government wants to remove pointless inefficiencies – things that we do simply because we've always done it that way. It's not good enough to force New Zealand businesses to comply with outdated rules simply because it's too hard to update them. Removing or updating rules that are no longer relevant and that have little real benefit will mean we can focus on driving our economy forward.*"

General comments on Land Transport Rules Reform Phase 1

12 Over thirty years ago, when vehicle size and weight limits were prescribed in regulations (The Traffic Regulations 1976) a paper-based permit regime was introduced to enable vehicles to operate at 20 metres length and 44 tonne. Those requirements were included in the Vehicle Dimensions and Mass (VDAM) Rule in 2002 which removed the necessity for individual vehicle permits. To a large degree the current "proforma" regime is not overly dissimilar to the 20 metre/44 tonne permit system from three decades ago. Therefore, the changes made in 2002 demonstrate that removing the need for permits is a workable and successful approach.

13 The Minister's release referred to in paragraph 10 refers *"Our Government wants to remove pointless inefficiencies – things that we do simply because we've always done it that way*." Over the last three decades considerable progress has been made with digital communications and information is now much more easily accessible. The current reform proposed by NZTA, and particularly the requirement that operators carry and produce information related to the respective proforma, is unnecessary and a pointless inefficiency. To a degree it nullifies the benefits of reducing the administrative compliance from not requiring permits because in effect the operators are still being required to carry and provide information which for all intent and purpose is not dissimilar to carrying a permit.

14 50MAX vehicles should be encouraged and their operating conditions on the network made as seamless as possible. Therefore, we recommend the dimensional and mass limits for 50MAX should become prescribed in the VDAM Rule or incorporated by reference. The latter would give allowance for additional proformas to be added. For on-road enforcement the Police can apply the relevant VDAM Rule requirements to the respective vehicle configuration and dimensions.

15 The benefits of NZTA's proposals are largely administrative and remove compliance costs. The Ministry of Transport's RIS refers to annual compliance cost savings related to removing the need for permits to be in the order of $173,000, and the costs related to no longer requiring H plates to be in the order of $429,000. The total annual savings are negligible in the context that the same RIS refers to a 2015 Castalia report prepared for the MoT which estimated the HPMV regime could deliver $502 million in net benefits between 2015 and 2045 and there is room to deliver additional benefits, considering that options to increase HPMV and 50MAX uptake could see benefits totalling over $1.1 billion.

16 Removing the obligation to display a sign and removing the need for operators to apply for permits will have negligible impact on increasing productivity of the general freight task. The road freight industry is deeply concerned that unless the scope of the impending Phase 2 consultation is expanded then the opportunity to make some meaningful change will be missed.

17 We are disappointed it appears that NZTA has elected to delay consideration of other relatively minor recommended changes that would help improve the efficiency and productivity of moving freight.

18 We have recommended additional changes to those proposed by NZTA at this time and we urge NZTA to expand the scope of Phase 2. Our changes are referred below in the section "Additional industry proposals for Phase 2".

Proposal 1: Remove 44T-50MAX permits

19 We support the removal of 44 tonne to 50MAX permits, which will reduce administration costs from having to apply for these, and renew them every two years.

20 Our support for this is based on our presumption that NZTA is also removing its requirement for proforma overlength permits. We request that NZTA confirm our presumption is correct at the earliest opportunity.

21 We support the proposed change in section 3.3 of the Heavy Vehicles Productivity Reform Amendment 2025 Rule regarding sections 4.3(11), 4.3(12) and 4.3(13) (a) to (c).

22 Given the appropriate weight limits are primarily determined by the vehicle combination's respective axle spacing dimensions, and the gross, axle and axle set masses are prescribed in the VDAM schedules, it appears it is unnecessary to identify specific vehicle types (trucks, prime movers and trailer types) and therefore we do not believe clause 4.3(13) (d) is necessary.

23 As section 3.4 of the Heavy Vehicles Productivity Reform Amendment 2025 Rule refers, the Director of Land Transport approves 50MAX vehicles. Therefore, in effect, the regulator is responsible for approving and managing the proforma designs. The regulator currently keeps the list of proformas current and makes them available on their website. We believe this is key part of the regulator's role and this should continue. The designs are therefore readily available to the public and enforcement officers and therefore they do not need to be provided by the operator.

24 We do not support the proposed change in section 3.3 of the Heavy Vehicles Productivity Reform Amendment 2025 Rule regarding section 4.3(14) that requires the operator to carry relevant proforma documentation, nor that the operator be obliged to produce the proforma to an enforcement officer on demand. The proposal that operators are responsible for carrying such information is somewhat inconsistent with the intent of removing permits.

25 A large part of increasing efficiency and productivity, particularly in terms of fleet utilisation, is having the flexibility and agility that enables truck and tractor units to operate with a variety of trailer units. For example, a tractor unit could tow a 3 axle semi-trailer, a quad semi-trailer or operate in a B-train combination. Similarly, a truck could operate by itself, or with a two, three, four or five axle trailer. In each of those cases the vehicle dimensions, the axle sets and the axle spacings will be different. The specific vehicle combination and the respective operating requirements should be assessed by the Police Commercial Vehicle Safety Team at the roadside at the time. This is an approach that has been successful over the last three decades and including the respective proforma requirements either in the VDAM Rule or incorporating them by reference in that Rule is an extension of that approach.

26 As the associated RIS notes, Australian studies show that vehicles meeting Performance Based Standards, which includes 50MAX, are involved in significantly fewer crashes than conventional heavy vehicles[3]. Therefore, the dimensional and mass limits for 50MAX should be prescribed in the VDAM Rule. A 50t GVM maximum, and maximum length of 23m should now be the default in the Vehicle Dimensions and Mass Rule, with permitting only required for vehicle combinations over 50t or 23m length. For on-road enforcement the Police can apply the respective VDAM Rule requirements to the respective vehicle configuration and dimensions.

[3] https://www.transport.govt.nz/assets/Uploads/Heavy-Vehicle-Productivity-Phase-1-RIS.pdf

Proposal 2: Remove H plates

27 We support the proposal to remove the requirement for HPMVs to display HPMV (H) signs. We concur with the conclusion in the discussion document that H plates no longer serve a useful purpose for regulation or enforcement, while they are burdensome for truck operators to remove and reattach every time their vehicles are loaded and unloaded or swapping trailers (which often doesn't happen in practice). Removing the requirement to display them will reduce administration costs for truck operators and eliminates penalties relating to incorrect or non-display of H plates.

Proposal 3: Bolster Attachment Code

28 We support the proposal to incorporate the Bolster Attachment Code by reference into the Heavy Vehicles Rule, rather than attaching it in full as currently. This will mean changes to the Code can be made easily without requiring a Rule amendment each time, and is a common-sense revision.

Proposal 4: Minor amendment to definitions

29 We support the proposal to remove the definition of "low volume vehicle" in the Rule.

Additional industry proposals for Phase 2

30 As referred above, over the past few years the road transport industry has been sharing its views on the barriers that the current land transport rules and regulations pose to adopting innovative vehicles and constraining efficiency and productivity of freight movements, and we have discussed improvement opportunities with NZTA.

31 The following proposals would deliver meaningful productivity gains across the road freight task. We have divided these recommendations into minor amendments (**Phase 2A**) and more substantive amendments (**Phase 2B**).

32 **Industry proposals for inclusion in Phase 2A:**

Ref.	Description	Land Transport Rule reference	Productivity/safety benefit
1.	Increase the inter-vehicle spacing limit from 4 to 5 metres. The increase would be conditional on lighting and/or conspicuity tape being attached to the	Land Transport Rule: Vehicle Dimensions and Mass 2016 (VDAM rule) Schedule 2, Dimension requirements. Inter-vehicle spacing	The additional spacing is required so vehicle combinations can meet the VDAM bridge formula axle spacing limits. Currently the 4 metre limit is being circumvented by objects being attached to the trailer however,

	drawbar to manage the risk of a third a party trying to drive into the space between the truck and trailer.		the proposed change is a much better way of managing the risk. This impacts thousands of truck trailer movements each year.
2.	Increase the gross combination mass limit for single drive tractor/truck units from 39 to 46 tonne The proposed increase would be conditional on the prime mover and trailer/s having Electronic Stability Control.	VDAM rule section 4 Limits set by vehicle configuration 4.3(2),4.3(3), and 4.3(4)	Operators would not need to pay the additional cost of tandem drive trucks/tractors, and the reduced tare weight of the prime mover would enable additional payload to be carried. The industry most likely to benefit most is car transporting and the benefits would accrue as prime movers are replaced with single drive however other combinations operating up to 46 tonne would also benefit. We anticipate this could benefit several thousand vehicles over time.
3.	Allow sucker (vacuum) trucks and crane trucks to apply for overweight permits by adding them to the current list of specialist vehicles.	VDAM rule section 5 Permits for specialist vehicles 5.11(2)	Sucker trucks are typically manufactured overseas. Some of the larger ones are limited to operating at their full potential because of our relatively low axle mass limits. Allowing them to access permits would improve their productivity. It is envisaged this would involve a small number of vehicles (less than 100). The increasing capability and capacity of modern truck mounted cranes results in an increase in tare weight and compromises the payload on the truck. As these trucks cannot currently apply for overweight permits they tow trailers which adversely impacts site access. Those crane trucks would be much more productive if they could operate without trailers.
4.	Allow super single tyres on 50MAX and HPMV vehicles.	NZTA Overweight Permit policy	Super single tyres offer superior handling and stability, particular when the lateral distance between the suspension point is

			made wider which reduces the risk of rollover and benefits safety. There are also environmental benefits in terms of reducing tyre wastage.

33 **Industry proposals for inclusion in Phase 2B:**

Ref.	Description	Land Transport Rule reference	Productivity/safety benefit
1.	Increase axle weights and vehicle widths for battery electric vehicles	VDAM rule, various sections	Increase access to high capacity, highly energy efficient low emission vehicles heavy. Avoid requiring impractical customisation from OEMs.
2.	Increase the maximum mass of a quad axle set to 26 tonne and review the spacing	VDAM rule part 2 Definitions and vehicle classes Quad-axle set Schedule 3, Part 1 Table 1.4 - Maximum sum of axle mass on a quad-axle set	The quad-semi is a common staple in the fleet and enabling more weight will increase the productivity of tens of thousands of journeys made each year. It is currently the default for carting 40 foot ISO containers that are now the most common used by exporters.
3.	Approve 4 axle prime movers and quad semi-trailer to operate at GCM up to 49 tonnes	Schedule 3, Part 3, Table 1.4 - Maximum axle mass for heavy motor vehicles operating on a HPMV or specialist vehicle permit RUC bands	There is an increasing international trend towards 36 tonne ISO containers. Allowing such inbound containers to travel from ports to destination will remove the need for them to be devanned. Allowing outbound containers to travel will help keep NZ exports competitive

34 We welcome further discussion with officials in relation to these proposals. We would appreciate the opportunity to discuss our submission with the NZ Transport Agency and Ministry of Transport directly. The lead author and coordinator of this submission can be contacted at the details below:

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