



## SUBMISSION

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Submission: Land Transport Rules Reform Phase 2: Heavy Vehicle Productivity

To: NZ Transport Agency Waka Kotahi  
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## **About Ia Ara Aotearoa Transporting New Zealand**

Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) is a national membership association representing the road freight transport industry. Our 1,200 members (with a combined fleet of 14,000 heavy vehicles) operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand helps trucking operators drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

# Submission on the Land Transport Rules Reform Phase 2: Heavy Vehicle Productivity

## Introduction

- 1 Transporting New Zealand appreciates the opportunity to provide a submission on NZTA's Heavy Vehicle Productivity phase 2 rules reform. We sought feedback from our membership on the proposals which has informed our recommendations.
- 2 As we commented last December in our submission on the Phase 1 consultation, we recommended additional changes to those proposed and we urged NZTA to expand the scope of Phase 1 with some specific changes. We are therefore disappointed those changes are not in Phase 2 and urge NZTA to consider extending Phase 2 to incorporate the relatively minor recommended changes we proposed that would help improve the efficiency and productivity of moving freight.
- 3 There is nothing confidential in our submission and we permit it to be published in full.

## Proposal 1: Rental Service Vehicle permit requirements

- 4 Whilst Transporting New Zealand supports the proposal to remove the requirement for heavy vehicle rental providers to hold an *overlength* HPMV permit when repositioning such vehicles, we submit that it does not go far enough.
- 5 This proposed amendment should not just be limited to heavy vehicle rental providers, but any heavy vehicle operator when renting out or selling HPMV vehicles (both overlength or mass, provided the combination complies with proforma specifications and operates unladen and without reward, as proposed). When heavy vehicle operators sell vehicles, it takes less than an hour to complete the sale and purchase agreement, but as noted in the consultation paper, it can take up to 10 days to obtain the HPMV permit to allow the sold combination to travel to the purchaser's depot, making it difficult to schedule movements.
- 6 Transporting New Zealand's preferred approach, as submitted on the Phase 1 consultation, is that vehicles operating up to 50MAX should not require a permit. For anyone renting out or selling a HPMV combination over 50 tonnes, or overlength, we recommend they be exempted from requiring an HPMV permit to relocate the combination, provide it operates unladen etc.
- 7 We also endorse the comments of the Motor Industry Association on this proposal, that this be a blanket exemption for heavy vehicle operators, but that any operators found in breach of the conditions have that exemption revoked for future rentals or sales of HPMV combinations.

## Proposal 2: Add new specifications for load pilot signs

- 8 Transporting New Zealand supports this proposal, although we have reservations about the proposal to enable all load pilot vehicle signs to be an optional reverse colour for greater

visibility in darkness, whilst acknowledging these have already been exempted. Our reason for this is that as new reverse signs become commonplace amongst regular operators of pilot vehicles, it will make the existing signs less effective, which may impose an upgrade cost on casual operators of pilot vehicles with older signs.

### **Proposal 3: remove forward-facing signs for rear pilot vehicles**

9 Transporting New Zealand supports this common-sense proposal.

### **Proposal 4: Enable class 1 driver licence holders to drive heavier zero emission vehicles**

10 Transporting New Zealand supports the proposal to enable Class 1 licence holders to drive a zero emissions vehicle with a GLW up to 7,500kg. We also supported the current 2-year class exemption which permits this, and so support revising the Driver Licensing Rule to formalise this.

11 In support of this change, Transporting New Zealand has previously outlined that EV light trucks up to 7,500kg are dimensionally and dynamically the same as diesel equivalents (and are often the same model, just with different powertrains), it is just the weight of the batteries that add to the GLW. If these light electric trucks were de-rated to 6,000kg then it would result in a payload loss relative to the diesel equivalent, which reduces productivity and negatively impacts the uptake of light electric trucks.

12 We concur with the discussion document that this Rule amendment should be powertrain agnostic, meaning it could also apply to other zero emissions vehicles like light hydrogen trucks, but we don't think it should include hybrid vehicles. Similarly we agree that Class 1 drivers of these vehicles should also be exempt from the requirement to hold a TSL so they are treated equivalent to the 6,000kg GLW diesel vehicles they replace.

13 We agree it would be impractical to carry over the conditions in the existing class exemption into a revised Rule (relating to the vehicles having advanced safety and braking systems). Nevertheless, there is merit in retaining this requirement to help inexperienced Class 1 licence holders control a heavier vehicle in the event of an incident. We suggest this could be addressed through the Rule only permitting drivers to drive electric vehicles up to 7,500kg manufactured after a certain date, thus more likely capturing vehicles fitted as standard with these features, as the consultation document implies.

### **Proposal 5: Improve the overseas heavy vehicle licence conversion process**

14 Transporting New Zealand supports the proposal to allow overseas heavy vehicle licence holders to convert their licence by either sitting tests or undertaking approved courses, without drivers who have undertaken the course needing to pay for an exemption.

15 Data provided to Transporting New Zealand from NZTA shows that in 2025, there were some 758 approved applications to convert an overseas heavy vehicle licence from

candidates that had completed an approved course. This would have cost each applicant \$100 and is a cost which will now be avoided if this proposal proceeds.

### **Proposal 6: Enable Class 2 and 2L licence holders to drive heavier electric buses**

- 16 Transporting New Zealand supports this proposal, but as with Proposal 1, we submit that it does not go far enough.
- 17 We accept the logic of enabling Class 2 and 2L licence holders to drive electric buses that are heavier than their diesel equivalents and exceed the current licence limits, in order to support the uptake of electric buses and meet emissions reduction goals. However, the same logic also applies to similar electric medium-duty rigid trucks which likewise exceed the current Class 2 drive licences thresholds than their diesel equivalents.
- 18 Transporting New Zealand submits that this proposal should broadly apply to all *zero-emission* rigid 3-axles buses *and* trucks with a GLW up to 22,000kg (e.g. RUC classes 311 and 6).

**ENDS**