



SUBMISSION

Submission: Proposals for regulations under the Land Transport (Revenue) Amendment Bill

To: Ministry of Transport
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About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry.

Our 1,200 member companies operate and support 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 firms operate successful, safe and 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 industry employs over 31,000 people and has a gross annual turnover in the order of \$9.73 billion ([Stats NZ, Deloitte analysis](#)). Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand ([MoT National Freight Demand Study 2018](#)).

Transporting New Zealand submission on the MoT proposals for regulations under the Land Transport (Revenue) Amendment Bill

Transporting New Zealand appreciates the opportunity to make a submission on the proposed regulations to modernise the RUC system (the regulations). We comment on each of the questions in the consultation document below.

Proposal 1: Electronic distance recorders

1. *Do you agree that regulations setting standards for electronic distance recorders should or should not differ between light vehicles and heavy vehicles?*

Transporting New Zealand does not support different standards for electronic distance recorders (EDRs) for light and heavy vehicles. If OEM telematics in light vehicles are deemed acceptable as EDRs, and similar capability is available in heavy vehicles then Transporting New Zealand sees no reason why that equipment should not be accepted for both vehicle classes. Allowing heavy vehicles to have the option of using OEM telematics equipment would also reduce regulatory compliance costs for heavy vehicle operators as currently they are fitting a supplementary system for an additional fixed cost plus subscription fee.

2. *Is the proposed outcomes-focused regulation approach for the electronic distance recording for light vehicles appropriate?*

The EDR technical requirements are robust. The outcomes focus should focus on enabling a framework that has high integrity and ensures all vehicles regardless of their type or weight are paying their way.

3. *Could there be unintended consequences from applying different regulation approaches to heavy vehicles and to light vehicles for electronic distance recording?*

We are concerned that an unintended consequence of applying different regulation or standards for light and heavy vehicles could be a loss of integrity and credibility in the revenue collection scheme and a risk of greater RUC avoidance by light vehicles not subject to more stringent standards.

Proposal 2: Approval of RUC providers

4. *Would the proposed criteria for approving RUC providers be sufficient to support robust and proportionate approval of RUC providers?*

Transporting New Zealand endorses the criteria proposed.

5. *Could there be unintended consequences from using any or some of the proposed criteria to approve a RUC provider?*

We believe there could be an opportunity cost if access to journey data is not mandated (see question 7 below).

Proposal 3: Performance standards for RUC providers

6. *Do the proposed performance standards provide the RUC collector with the ability to regulate RUC providers while remaining proportionate and workable for providers? Or, would additional or alternative standards be necessary?*

The proposed standards appear to cover the minimum requirements necessary to maintain a credible RUC scheme.

7. *Should RUC providers be required to share the proposed information with the RUC Collector where necessary for system integrity and oversight?*

Transporting New Zealand supports this requirement, but we recommend an additional criteria be added that obligates a RUC provider to make a transport operators journey data available if requested by them, or by the NZTA.

8. *Should RUC providers be required to keep a record of their management of complaints from their RUC users, and share records with the RUC collector on request?*

Yes, we support this requirement.

9. *Are the proposed procedures for the RUC collector to carry out monitoring and review of RUC providers sufficient, and do you see any potential implementation risks?*

We endorse the proposed procedures.

10. *Could any of the proposed standards or requirements make it hard for RUC providers to be flexible or innovative?*

No comment.

Proposal 4: Information protection and privacy

11. *Do the proposed requirements provide sufficient protection for road user information? If not, what additional or alternative requirements should be included?*

Transporting New Zealand is satisfied with the proposed requirements.

Proposal 5: Alternative payment schemes

12. *Are the proposed outcomes for scheme design sufficiently clear and predictable for the RUC collector to determine the suitability of a scheme?*

The proposed outcomes are comprehensive but appear to be designed to accommodate one scenario, namely post-payment options.

In addition to these outcomes, Transporting New Zealand recommends the regulations explicitly limit transaction fees and additional charges by RUC providers for all payment schemes.

There is a need for the provision of cash or counter purchases of RUC for those people who do not have access to credit, but there is a risk that the administration costs for these transactions could be disproportionately high, especially for low RUC distance purchases (by low-income New Zealanders who cannot afford to buy RUC in larger volumes). Thus administration fees could disincentivise manual RUC purchases (in favour of electronic transactions), and

disadvantage the people who can afford it least. Thus limiting transaction fees is needed so that low-income New Zealanders are not disadvantaged by a mandatory universal RUC regime compared to the current FED regime which has no administration costs and enables low-volume (petrol) purchases and full compliance.

We would also encourage officials to review whether the proposed requirement for alternative payment scheme providers to accept liability for paying RUC whilst a vehicle is registered with a scheme is in compliance with the RUC Act.

ENDS