



SUBMISSION

Submission: Proposed changes to modernise NZTA services

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).

Transporting New Zealand submission on the proposed changes to modernise NZTA services consultation document

- 1 Transporting New Zealand appreciates the opportunity to provide a submission on NZTA's consultation on modernising services, and associated amendments to the Driver Licensing Rule, Vehicle Standards Compliance Rule, Operator Licensing Rule and the Land Transport (Motor Vehicle Registration and Licensing) Regulations. We sought feedback from our membership on the proposals via an online survey which has informed our feedback.
- 2 Transporting New Zealand is generally supportive of enabling digital driver licences and enabling electronic alternatives to physical vehicle licences and labels, and we supported the enabling legislation through the Regulatory Systems (Transport) Amendment Bill (now Act).
- 3 There is nothing confidential in our submission and we permit it to be published in full.

Proposal 1: Digital driver licences

- 4 Transporting New Zealand supports amending the Land Transport (Driver Licensing) Amendment Rule (the 'Rule') to permit the Director to approve electronic driver licences, provided they meet the privacy and security conditions set out in new section 62A. That said, we're not sure that a digital licence will provide any significant improvement over the current plastic licence, and as it will only be recognised in NZ (and hopefully Australia), users will need to be made aware they will still need a plastic licence if planning on driving in any other countries.
- 5 Respondents to our small member survey were broadly supportive of digital driver licences, with 12 of 14 responses (85%) saying they would use a digital licence, and 10 (71%) saying they would see value in their drivers also using digital licences. Eight respondents (57%) believed a digital licence would be more efficient and harder to fake than a plastic licence, while 4 (28%) were neutral. One respondent, who also operates trucks in Australia, noted that the use of digital driver licences works well there and avoids the need for drivers to always carry a wallet.
- 6 By contrast, Transporting New Zealand also made the survey available via our Facebook page, for which we can assume responses were from individuals and don't reflect the views of transport operators. This version of the survey generated 153 responses, for which the majority of respondents overwhelmingly opposed digital driver licences, with 78% stating they would not use one, with 67% believing they would be easier to fake and less efficient than a plastic licence. The overall tone of the feedback was opposition to forms of digital ID.

Proposal 2: Modernising driver licensing processes

- 7 Transporting New Zealand supports the proposals to enable different requirements for first time driver licence applications and subsequent applications (for renewal, replacement, endorsements etc.) as a common sense approach which will reduce unnecessary work for customers.

- 8 Transporting New Zealand supports enabling the use of RealMe identity verification for online driver licence applications.
- 9 We cannot comment on the proposal for stronger verification requirements for overseas licence conversions as these requirements are not outlined in the draft amendment Rule. We think this criteria needs to be clear and consistent, so that potential employers seeking workers from other countries understand what is required to facilitate their employment.
- 10 We are sceptical of the proposal to enable an online theory test due to the ability for applicants to easily search for answers and the associated risk of fraud.
- 11 Transporting New Zealand supports the proposal to allow temporary licences to be issued in alternative formats, including digitally. This aligns with the proposal to enable digital (permanent) licences, and will provide a more robust option than the current paper version.

Proposal 3: Enable electronic alternatives to the physical display of vehicle licences and labels

- 12 Transporting New Zealand supports enabling the *optional* electronic alternative to physical licences and labels. For heavy vehicles which also have to display RUC labels, there can be a plethora of labels displayed on the left-hand bottom corner of a windscreen – typically 5-6 – and while this placement is so they are not directly in the drivers' vision, these can partially obscure some vision for left-turning manoeuvres. It is also an offence to fail to display a current label, but there is a risk that an expired label is not replaced even when a new label has been obtained (or is mistakenly placed behind the old one), or is delayed due to waiting for the new label in the post. It's likely that an electronic format will be updated promptly (such as when a new CoF has been obtained), and the option of electronic alternatives/enforcement will help eliminate such human errors.
- 13 Respondents to our small member-only survey were largely supportive of this option, with only two out of 14 (14%) opposing the proposal. Most respondents said they would choose not to display vehicle licence ('rego') labels, CoF (or WoF) labels, and Certificate of Loading and Transport Service Licence labels on their heavy vehicles. Few selected the alternative fuel inspection certificate, which might reflect the small number of alternative fuelled heavy vehicles in the fleet.
- 14 When asked what benefits respondents saw from dispensing with physical labels, the majority said it would save time (100% nominating "no delay waiting for new labels"), "less administration" (80%), and "avoiding fines for failing to display a valid label" (also 80%). There was also a majority view that this would lower costs through not printing and/or posting labels, and would also improve accuracy.
- 15 In terms of problems electronic alternatives to physical labels could pose, some respondents suggested it would make it harder for drivers to tell whether a truck is due for its CoF, saying that companies will need to have robust systems in place to ensure drivers are aware.

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