SUBMISSION

Submission:	Delivering Safer Heavy Goods Vehicles for Australia and New Zealand
To:	ANCAP Safety policy@ancap.com.au
Date:	6 November 2026
Contact:	Mark Stockdale, Policy and Advocacy Advisor Transporting New Zealand mark@transporting.nz ph. 021 434 097

About 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 ANCAP consultation paper

Summary

1 Transporting New Zealand appreciates the opportunity to provide a submission on ANCAPs consultation on delivering safer heavy goods vehicles (HGVs) for Australia and New Zealand. We analysed several vehicles rated by the Euro NCAP Truck Safe and sought feedback from our members on the proposals to inform our comments and recommendations. We have provided some general comments as well as responses to the questions in the consultation paper below.

2 Our members are familiar with the benefit ADAS bring and ADAS features significantly in new vehicles entering the New Zealand truck fleet.

3 Transporting New Zealand is generally supportive of good quality, high integrity information that is meaningful and easy to understand being made available to help inform vehicle procurement choices

4 In terms of focussing on risk and investing time and money in areas for good return, we do not believe the NZ Transport Agency (NZTA) should be investing or supporting the development of an Australasian equivalent to EuroNCAP Truck Safe because given the subtle technical nuances between vehicles within the same star ratings, a new or alternative system is highly unlikely to add much more value in terms of uptake of ADAS across the New Zealand HGV fleet and nor will it enable our members to make better procurement decisions.

5 We believe that EuroNCAP Truck Safe currently provides the key information useful to operators and that the focus should be on new HGV suppliers in New Zealand ensuring that when ADAS features are fitted to HGVs sold here, those features are the same as the ones assessed under the EuroNCAP Truck Safe.

General comments

6 The Case for Change section of the consultation paper refers *"The challenge for New Zealand is that this lower regulatory floor provides an opportunity for manufacturers to provide lower-specified product into the New Zealand market. Without an incentive (such as an ANCAP-style intervention) manufacturers are unlikely to provide vehicles with higher safety specifications"*. This position is completely at odds with what we understand to be the actual case.

   a. While the fitment of specific Advanced Driver Assistance Systems (ADAS) is not specifically recorded at vehicle entry into our fleet, NZTA has assessed fitment rates by assessing the country of origin requirements to estimate the ADAS fitment of mew HGVs entering our fleet over the last 15 years, and we undertook a survey of our members (para 17 below refers).

   b. NZTA estimates of fitment rates of ADAS features for the last three years range between 85-90%. NZTA's assumptions in undertaking its analysis mean the results will be

pessimistic, not optimistic. In other words, the fitment rate percentages are likely to be higher not lower than NZTA has estimated.

c. Our member survey indicates lower fitment rates, and we expect the NZTA analysis to be more accurate. Putting aside Lane Departure Warning and combining the data sets indicates that it is highly likely that about three quarters of new fleet is fitted with ADAS. Therefore the position that manufacturers are unlikely to provide vehicles with higher safety specification without an incentive such as an ANCAP-style intervention is clearly wrong and it is highly doubtful whether an ANCAP version of EuroNCAP Truck Safe would add material value to increasing the uptake of ADAS in trucks in New Zealand.

7 In our analysis comparing trucks of the same EuroNCAP star rating we were surprised at the variability within specific attributes of the sub-categories, for example:

a. The MAN TGL (4x2) and Scania R-series (6x2) both scored 5-star CitySafe.

(i) In the Safe Driving pillar the MAN and Scania scored 89% and 76% irrespectively. In the Vision sub-category respective scores were 45/50 and 26.3/50 points. The Direct and Indirect vision of the MAN is rated as “Good” whereas the Scania's Direct vision is "Adequate" and its Indirect Vision is "Marginal".

(ii) Similarly, in the Crash Avoidance pillar the MAN and Scania scored 71% and 96% respectively. In the Lane Departure Collisions sub-category the MAN scored 0/25 for Lane Departure Collisions whereas the Scania scored 22.5/25.

b. The IVECO S-WAY (6x2) and the Isuzu F-Series (4x2) both scored 2-star. In the Safe Driving category the IVECO scored 68% and the Isuzu scored 67% however, driver direct vision was rated "Marginal" for the IVECO and "Good" for the Isuzu.

c. A concern we have is that operators could find the star rating confusing and their expectations of the equipment levels might not be met. For example, bearing in mind Lane Departure Warning (LDW) is commonly seen by many as a valuable potential safety driver aid, particularly in New Zealand where the vast majority of our roads are undivided, it seems strange that two vehicles are 5-star rated yet one does not have Lane Departure Collisions technology. And similarly with the 2-star vehicles compared above, our understanding is that driver visibility is very important and yet while one vehicle has good direct vision the other is marginal.

8 We also note there is considerable variability in the capability of the same technology. For example, the IVECO and Isuzu vehicles referred above both have AEB. However, the AEB on the IVECO is for front to rear collisions with other vehicles whereas the AEB on the Isuzu has coverage for both vehicles and vulnerable roads users. Many operators will be unaware of these differences.

9 The detailed information provided by EuroNCAP is useful in enabling a transport operator to select a vehicle based on specific attributes or different capability of an attribute best suited to the respective nature of an operator's transport activity. However, as demonstrated above, despite vehicles having the same star rating there may be considerable variability with their different strengths and weaknesses. This appears to somewhat devalue the usefulness and meaningfulness of the star rating to a person relying on it to make a choice between vehicles of the same rating.

10 There is also concern around where and how NZTA should be placing its efforts. Therefore, in terms of focussing on risk and investing time and money in areas for good return this is a very low priority and Transporting New Zealand does not believe NZTA should be investing or supporting the development of an ANCAP equivalent to EuroNCAP Truck Safe.

11 We believe the information that is key to our members is currently available with Euro NCAP Truck Safe and that a new or alternative system will not bring much more value in terms of uptake of ADAS across the New Zealand truck fleet nor will it better inform and position our members to make procurement decisions, particularly given the subtle technical nuances within the same star ratings.

12 We recommend that a better way forward is for new HGV suppliers in New Zealand to ensure that when ADAS features are fitted to HGVs sold here, those features are the same as those assessed by the EuroNCAP Truck Safe.

13 Notwithstanding our position, we have provided responses to the specific questions asked in the consultation document below.

Market characteristics

14 Key features of the Australian (and NZ) HGV market that differ from the European market are the operating conditions and different axle weight limits and vehicle combinations and dimensions. However in terms of safety features, the same equipment fitted in Europe is available in the Australia/NZ market.

15 Notwithstanding our comments above, we suggest ANCAP should focus any HGV program on assessing Class NB medium-duty rigid trucks as they make up a larger portion of the fleet and more commonly operate in urban environments where safety features focusing on vulnerable road users will have greater benefit and relevance (like EuroNCAPs “City Safe” label).

16 Our survey respondents were split on whether an ANCAP rating would be relevant to purchasers. Considering our small market size, vehicle purchases are fit for purpose and there are limited options within market segments which tend not to vary in terms of safety features or options.

Vehicle technologies

17 In November 2025, Transporting NZ undertook a member survey on the fitment rates of various safety equipment to new heavy vehicles purchased or ordered since January 2023. The survey was undertaken to inform feedback on consultation by the NZTA to mandate ADAS on both light and heavy vehicles (which the Government recently announced would not be proceeding). 190 responses were received to the survey, which illustrated:

- 50% of new heavy vehicles purchased since January 2023 were equipped with AEB
- 35% of new heavy vehicles were equipped with Lane Departure Warning
- 52% of new heavy vehicles were equipped with ESC
- 77% of new heavy vehicles were equipped ABS

18 In addition, the NZTA has undertaken some analysis to estimate the fitment rate of safety technologies to HGVs, illustrated in Table 1 below. As this information is not officially recorded for HGVs entering the fleet, NZTA have estimated this by assessing the country of origin of HGVs entering the New Zealand fleet and determining the requirements in the country of origin at the date of manufacture. This assumes that the models entering NZ do not have those ADAS features removed from the requirements in the source jurisdiction when coming to New Zealand.

Table 1: Percentage (%) of heavy vehicles entering the NZ fleet 2023-2025 fitted with ADAS features

	Percentage (%) of new fleet fitted with ADAS feature			
Year	ESC	AEB	LDW	ABS
2023	89	89	85	89
2024	80	80	76	80
2025	90	90	85	90

19 Regarding bonneted trucks, our members advised that they tend to be fitted with the same safety equipment as cab-over-engine (COE) trucks, however European COEs tend to have integrated safety systems not fitted to bonneted trucks or Japanese COEs.

Designing for the New Zealand market

20 A recently-released report by the NZ Automobile Association compiling NZ crash data[1], shows that in 2025, truck drivers or occupants made up 2% of deaths and serious injuries, or 63 people.

21 Table 2 below illustrates the total number of deaths and serious injuries in crashes involving trucks from 2020-2024, including other road users.

Table 2: Deaths and injuries in NZ involving trucks

Year	Fatalities involving trucks	Total fatalities	% fatalities involving trucks	Serious injuries involving trucks	Total serious injuries	% serious injuries involving trucks
2024	47	292	16.10%	172	2461	6.99%
2023	57	342	16.67%	159	2461	6.46%
2022	60	371	16.17%	208	2497	8.33%
2021	82	319	25.71%	172	2326	7.39%
2020	61	319	19.12%	167	2184	7.65%

Source: MoT/NZTA Crash Analysis System

22 The key differences between the HGV markets in Australia and NZ are the respective operating environments:

[1] *AA Road Safety Review 2026*

a. NZ's particular axle mass limits which result in different axle configurations and the addition of extra axles. Operationally, NZ has lower maximum speed limits for HGVs (90km/h).

b. Australia features wide, multi-lane highways, smooth tarseal surfaces, and very low trafficked vast open stretches of clay roads. In contrast, New Zealand has a very small amount of multi-lane median divided highway. Much of our network between major cities is rural and scenic and the roads are frequently narrow, winding, mountainous. Our unsealed sections are typically metal and we have a large number of bridges and culverts.

23 An HGV safety assessment programme tailored for the NZ market could incorporate research undertaken in NZ by the Log Transport Safety Council into static roll thresholds and dynamic load transfer ratios.

24 Specific considerations in the NZ to market to incorporate into any protocol are our unique axle limits and axle combinations.

The Rating approach

25 Given that ANCAP crash test assessments for light vehicles are star-rated, it might make sense to use a grading system for HGVs to fully differentiate from the light vehicle ratings and so avoid any impression that HGV assessments involve crash testing.

ENDS