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NZ Automobile Association submission on:
Considering changes to light vehicle inspections



SUBMISSION TO: New Zealand Transport Agency / Waka Kotahi

REGARDING: Considering changes to light vehicle inspections

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Executive summary

The New Zealand Automobile Association (AA) welcomes the opportunity to provide comment on the proposed changes to light vehicle Warrant of Fitness (WoF) and Certificates of Fitness A (CoFA) inspections.

The AA believes WoF and CoF inspections should ultimately be based on the distance vehicles travel as distance is a better indicator of wear and tear rather than the age of a vehicle. We acknowledge that the best time to introduce a distance based WoF and CoF will be following the introduction of distance-based road user charges as the systems and technology to support distance-based road user charges could also support distance-based WoF and CoF.

However, addressing the proposals outlined in the consultation document the **AA agrees with the proposals to**

- Extend the period for WoF inspections from one year to two years for light vehicles aged over 4 years and less than 10 years.
- Maintain annual WoF inspections for light vehicles aged between 10 years and 25 years.
- Change from 6 monthly to annual WoF inspections for light vehicles over 25 years.
- Change the CoFA inspections for rental vehicles under 5 years from 6 monthly to annual inspections.
- Maintain the 6 monthly inspection period for rental older than 5 years and taxis and rideshare vehicles of any age.

We believe this will have a minimal impact on road safety while saving the owner's unnecessary warrant expense and time.

We are concerned that other proposals may impact on road safety with only marginal savings and we **recommend** the following.

- Maintain the existing WoF inspection frequency of 3 years for new vehicles.
- Increase the inspection scope for inspecting Advanced Driver Assistance Systems from just a visual, audio or electronic alert inspection to on-board diagnostic scanning.

Overview

This submission reflects two key aspects of the AA's position on the proposed changes.

First, it considers the benefits and risks these changes present to our members, ensuring their safety, convenience, and confidence remain at the forefront. Second, it addresses the potential impact on the inspection sector, particularly the reduction in work undertaken because of the proposed reforms. Together, these perspectives highlight the need for a balanced approach that safeguards member interests while maintaining the sustainability of the services they rely on.

Modern vehicles are engineered for exceptional reliability and monitored continuously by advanced onboard systems. Crashes due to mechanical faults are now rare, and studies show diminishing or non-existent safety returns from more frequent inspections. Most inspection failures are related to friction not age. These friction failures being brake pads, tires and suspension components that wear out as they are used over time.

Studies reviewed in Denmarkⁱ and New Zealand found **no clear causal link between more frequent inspections and lower crash rates**, with any observed effect being small and likely confounded by other factors such as driver behaviour and maintenance practices. The most recent systematic review concluded that increasing periodic inspections may offer only a slight reduction in crashes, and that increasing inspection frequency does not deliver proportionate safety gains. Analysis by the Ministry of Transport shows that crashes where vehicle defects are a contributing factor make up only **around 2–3% of all injury crashes**, and this proportion has been declining over time.

In contrast, the compliance costs of six-monthly inspections are significant. Moving to annual inspections will halve the number of inspections for this small and diminishing cohort, reducing costs for owners without materially increasing safety risk. These older vehicles have less features to inspect and are usually driven less than new vehicles. There is no compelling evidence why they should be inspected more frequently than the annual requirements of younger vehicles 10-25 years old. This approach aligns New Zealand more closely with international practice, where annual or biennial inspections are standard even for older vehicles, and ensures the system remains proportionate and targeted to risk.

The proposals in this submission, if implemented, would deliver an optimal level of frequency and confidence that a vehicle, whatever it's age, is fit to be driven on New Zealand's road. In our view they strike the right balance between safety and cost.

Membership Surveys

The AA recently conducted Member surveys focused on vehicle safety, fines and penalties, and inspection behaviours. These surveys provided clear insights into how Members maintain their vehicles, how they use and value Warrant of Fitness (WoF) inspections, the barriers that prevent compliance, and how the WoF system could be improved or modernised.

The headline findings of the survey are that Members show no clear preference on the frequency of inspections. Approximately one third supported the governments proposed changes, one third opposed them and one third remain neutral. Given this the AA has strived to provide a balanced approach recognising both cost and safety for our members.

The AA acknowledges that reducing the frequency of WoF inspections may deliver cost savings for members through lower inspection fees and less time spent on compliance. Some of our Members, particularly younger and lower-income group have found these costs difficult to meet.

In our recent survey, more than 30% of AA Members aged 18–34 and 22% of those earning \$50,000 or less report struggling with WoF-related costs. This cohort usually does not purchase new vehicle and are significant purchasers of older vehicles. For cars aged 10 years or more 45% are aged between 18 to 34, and 52% of people with household incomes below \$50,000.

We think all private vehicles aged more than 10 years old only need an annual inspection to achieve the best balance between reasonable safety checks and compliance. As time progresses, vehicles over 10 years old will have the features we see today in new vehicles and have been built to the exacting standards of modern manufacturing. However, with more technology features becoming

normal in vehicles, that could possibly require On Board Diagnostic scanning or calibration being needed regularly.

AA Survey Key Finding

- Many Members rely on WoF inspections to identify safety issues and do not consistently self-check their vehicles. This suggests that reducing inspection frequency needs to be offset by robust education and reminder systems.
- Enforcement is perceived as weak; if inspection intervals are increased, stronger deterrents and more effective education will be needed to maintain compliance and safety standards.
- Cost is a barrier for some Members, particularly younger and lower-income groups.
- There is strong support for modernising the inspection scope to include checks on advanced safety technologies and emissions.

Maintenance behaviour is inconsistent.

- 1 in 4 (26%) do not check their tyre tread/pressure between WoFs.
- 4 out of 10 (42%) rely on dashboard alerts to identify safety issues.
- 8 out of 10 service their vehicle according to the manufacturers' recommendations – 16% do not.

WoFs are seen as an effective safety tool.

- 6 out of 10 (57%) of Members think that WoFs prevent crashes – 17% think that they do not.
- 7 out of 10 (73%) think that the current WoF system is effective at identifying vehicle safety faults – 7% do not.

WoFs help identify faults that owners may miss.

- Nearly 6 in 10 (59%) rely on their WoF to identify vehicle faults.
- 4 out of 10 (42%) have failed a WoF due to a safety issue they weren't aware of.

Safety remains a priority for our members.

- 71% of members want WoF checks to include advanced safety technologies such as automatic braking and lane assist, with only 9% opposed.
- 78% members support more frequent inspections for commercial passenger vehicles, with minimal opposition (4%).

These findings highlight the need for a balanced approach that delivers cost savings while maintaining safety and adapting to modern vehicle technologies.

Inspection Services

The AA is concerned about the long-term implications of reduced work and revenue for the sustainability of WoF services. Our concern is twofold. First, while inspection frequency may decrease under the proposed changes, the cost per inspection is likely to rise because overheads will remain constant, with fewer inspections to offset these fixed costs. This could lead to higher inspection prices for members. However, these could be offset by Member time saving from less frequent inspections.

Second, we are worried about the future provision of services. As vehicles increasingly adopt advanced safety technologies, inspection providers will need both the capability and capacity to assess these features. A reduction in the workforce today risks undermining that future capacity, potentially limiting access to affordable and convenient WoF services for members in years to come.

Proposals we agree with

Extending WoF inspections to two years for light vehicles aged 4-10 years.

Extending WoF inspections from annual to biennial for vehicles aged 4–10 years offers the greatest benefit with minimal risk to vehicle safety. Vehicles under 10 years old have significantly lower defect-related crash rates, and international evidence supports this approach. For example, a study published in the *Road Traffic Research Journal* reviewing Denmark’s biennial inspection regimeⁱⁱ found no clear evidence that more frequent inspections improve safety outcomes. This subset of vehicles represents 23% of those currently subject to WoF. Changing to an inspection every second year delivers substantial economic benefits, with net present annualised savings estimated at \$55.35 million per year from 2027 to 2055. These savings, combined with minimal evidence of increased safety risk, are why the AA supports moving from annual to biennial WoF inspections for this group.

Maintaining annual WoF inspections 10-25 years

It is recommended that the annual WoF inspection period be retained for vehicles in this age band. These vehicles represent the bulk of New Zealand’s light fleet and showcase the evolution of safety technology from 2000 to 2015. While newer vehicles increasingly feature advanced crash avoidance and occupant protection systems, older models lag significantly in these areas. Rightcar’s updated safety ratings highlight that a large portion of the used fleet sits at the lower end of the safety scale, with improvements over the past 30 years primarily benefiting occupants rather than preventing crashes. Maintaining annual inspections for these vehicles ensures that safety checks, for not only mechanical wear but advanced driver assistance systems, are in place. The annual inspection after a vehicle is 10 years old will be a rolling age limit and is an advancement on a fixed date, pre-2000, which is in place currently.

Change from 6 monthly to annual WoF inspections for lights vehicles over 25 years.

The AA supports this change because the safety benefits of six-monthly inspections for older vehicles are minimal compared to the compliance burden they impose. For vehicles manufactured before 2000—the group currently subject to six-monthly inspections—the crash risk attributable to inspection-related defects is very low, and the fleet size and annual travel for this cohort are

shrinking rapidly. Projections indicate these vehicles will largely disappear from the fleet by the mid-2030s, further reducing any associated risk.

Move CoF A inspections for rental vehicles under 5 years from 6 monthly to annual inspections.

The AA supports changing CoF A inspections for rental vehicles under five years old from six-monthly to annual because this segment of the fleet presents a very low safety risk. Rental vehicles in the fleet of reputable hire companies are typically newer—often less than two years old—and maintained to high standards due to strong commercial incentives and fleet management practices. Data shows these vehicles have higher initial inspection pass rates than private vehicles, even under the current more rigorous CoF A regime.

International comparisons reinforce this approach. Most jurisdictions, including Japan, Ireland, Sweden, and New South Wales, require annual inspections for rental vehicles, not six-monthly. New Zealand’s current six-month interval is more frequent than necessary and imposes unnecessary compliance costs without delivering proportionate safety benefits.

Reducing the frequency to annual inspections will significantly lower compliance costs for rental operators while maintaining safety assurance. The Director of Land Transport will retain discretion to vary inspection intervals for operators based on safety performance, ensuring flexibility and accountability. Importantly, crash data indicates minimal risk: only one crash involving a CoF A vehicle has listed a vehicle fault as a contributing factor since 2014.

Maintain the 6 monthly inspection period for rental older than 5 years and taxis and rideshare vehicles of any age.

The AA supports maintaining the current six-monthly CoF A inspection frequency for rental vehicles older than five years and for taxis and rideshare vehicles of any age because these vehicles present a higher safety risk compared to newer rentals. Maintaining six-monthly inspections ensures that vehicles carrying paying passengers remain safe, reliable, and compliant with the higher standards expected for commercial service.

Unlike large rental fleets, which typically retire vehicles after one to two years, older rentals and taxis often remain in service for extended periods and accumulate high mileage. This increases wear on critical safety components such as brakes, tyres, and suspension systems.

Taxis and rideshare vehicles also operate under varied maintenance regimes. While some operators maintain high standards, others—particularly single-operator rideshare vehicles such as UberX—may lack the structured maintenance processes of large fleets. Frequent inspections help ensure these vehicles meet the higher safety standards required for passenger service vehicles, protecting both occupants and the public.

International practice supports this approach. Most jurisdictions require more frequent and stringent inspections for commercial passenger vehicles than for private cars. For example, the UK mandates inspections as often as every three months for taxis, and other countries such as Japan and Sweden require annual checks at a minimum. New Zealand’s six-month interval is consistent with these higher-risk categories and reflects the intensive use and exposure of these vehicles.

Reducing inspection frequency for these cohorts could compromise safety assurance without delivering significant compliance savings, as these vehicles represent a small proportion of the fleet.

Proposals we don't agree with

Changing the first WoF inspection period from 3 years to 4 years.

The AA strongly supports retaining the current requirement for the first WoF inspection at three years for new vehicles. While modern vehicles are equipped with advanced safety technologies and improved manufacturing standards, safety-critical components such as tyres, brakes, and suspension remain subject to wear and tear from mileage, road conditions, and driver behaviour. These components are friction-dependent and can degrade below safe limits without the owner's awareness. A three-year inspection helps identify these issues before they lead to crashes or costly repairs.

International evidence reinforces this position. The UK Department for Transportⁱⁱⁱ recently consulted on extending its first MOT from three to four years and decided against the change after reviewing failure rates and safety risks. Their analysis showed that tyres and brakes were the most common reasons for first-test failures, and delaying inspections would leave hundreds of thousands of vehicles with dangerous defects on the road for an additional year. Electric vehicles (EVs), which are heavier and have higher torque, were found to have even higher tyre failure rates at three years, further underscoring the need for timely inspections.

International Practice

New Zealand's current three-year interval aligns with best practice in jurisdictions that prioritise road safety. While some countries allow four years before the first inspection, these jurisdictions often have younger fleets, stronger maintenance cultures, and complementary enforcement measures.

Cost-Benefit Analysis

The financial benefit of delaying the first WoF inspection is minimal—roughly the cost of one inspection over the vehicle's lifetime. In contrast, the potential safety risks are significant. It's not that an extra year alone adds safety risk, it's that the extra year is added to an initial 3-year inspection period. Defects left undetected for an extra year at this point can lead to crashes, higher insurance premiums, and more expensive repairs when faults worsen over time. An extra year for new vehicles makes the inspection period too long as friction faults take time to develop. New vehicles usually have higher mileage, and these faults would likely manifest themselves in the 3-to-4-year interval. Our inspection services believe most new vehicles would pass a tire tread inspection at 3 years but not at 4 years.

The UK analysis concluded that the savings from skipping a single inspection were not robust enough to justify any decrease in road safety, especially when the current inspection cost represents less than 1% of annual motoring expenses.

Conclusion

Maintaining the current three-year interval for the first WoF inspection ensures that defects are detected early, reducing the likelihood of crashes and costly repairs. It also supports New Zealand's commitment to road safety and aligns with international evidence showing that early inspections deliver measurable safety benefits. Any change to this setting would compromise safety for negligible financial gain.

Vehicle Inspection Scope

The AA recommends enhanced ADAS inspection using On-Board Diagnostics

Why Visual Checks Are Not Enough

The current proposal in the discussion document suggests adding ADAS checks to WoF and CoF A inspections by confirming that no visual, audible, or electronic fault indicators are present. While this is a positive step, it is insufficient to guarantee that these critical safety systems are functioning correctly. Warning lights can fail, be ignored, or even be disabled. Relying solely on dashboard alerts risks missing latent faults that compromise system performance.

ADAS features such as Automatic Emergency Braking (AEB), Lane Keep Support (LKS), and Blind Spot Monitoring are designed to prevent crashes or reduce severity. If these systems are partially degraded or mis-calibrated, they may not trigger a fault indicator but still fail to operate effectively in an emergency. International best practice increasingly involves deeper diagnostic checks to confirm system integrity.

Why On-Board Diagnostic (OBD) Scanning Should Be Introduced

OBD scanning provides a direct interface with the vehicle's electronic control units, enabling inspectors to:

- Detect stored or pending fault codes that may not yet trigger a warning light.
- Verify calibration status for sensors and cameras critical to ADAS performance.
- Confirm that software updates or recalls have been applied where required.

This approach aligns with the principle of ensuring safety-critical systems are functioning as intended, not just appearing fault-free. It also future-proofs the inspection regime as vehicles become more software-driven and reliant on sensor-based technologies.

International Trends and Future Readiness

Jurisdictions such as Germany and Japan already incorporate electronic diagnostic checks for advanced safety systems in their periodic inspections. As New Zealand moves toward mandating ADAS features in new vehicles, inspection standards must evolve to match these technologies. Introducing OBD scanning now will ensure our system remains credible and effective as vehicle automation increases.

Implementation Considerations

- **Cost and Equipment:** Modern diagnostic tools are widely available and affordable for inspection stations. Many workshops already use OBD scanners for servicing.
- **Training:** Inspectors will require training to interpret ADAS-related fault codes and calibration data, but this is a manageable extension of existing competencies.
- **Phased Rollout:** Start with CoF A inspections for commercial passenger vehicles, then extend to WoF inspections for private vehicles equipped with ADAS.

Vehicle Inspection Scope

The AA notes that NZTA / Waka Kotahi is considering mandating additional ADAS features to vehicles entering the fleet. The AA recommends that a full review of WoF and CoF inspection requirements be completed during the phase in period for the proposed mandated features. This review should encompass the scope and depth of the inspection criteria and require OBD scanning to ensure the functionality of all safety devices fitted to a vehicle.

Conclusion

Moving beyond visual checks to OBD scanning for ADAS systems is a logical, low-cost enhancement that significantly improves safety assurance. It ensures that critical technologies designed to prevent crashes are functioning correctly, aligns with international best practice, and prepares New Zealand for the next generation of vehicle safety standards.

Enforcement and Education

Road safety is a strategic priority for the Government. It has released a Road Safety Objectives document which include a range of actions targeting the highest contributors to fatal road crashes, focusing on safer roads, safer drivers, safer vehicles and resetting our approach to speed limits.

One of the key actions for improving road safety is reviewing penalties for traffic offences.

In response to the Government objectives the AA established an internal working group that establish the association's policy position on fines and penalties. The AA is advocating that penalties should be increased at least 100% from the current level to reflect the loss of the deterrent factor since the fines were set in 1996. We also think that offences that carry the greatest safety risk should be increased beyond a 100% increase and establish consistent penalties with clear links to risk.

Although we favour increased fines, we think that compliance related to vehicle safety can be achieved in other ways. The AA supports fines being waived if people get a WoF within a period of time, maybe 28 days, to incentivise an outcome of safe vehicles on the road and try and avoid adding financial difficulty if someone is struggling to get a WoF due to costs. Below are bullets points on other factors that the AA thinks would incentivise better WoF and CoF compliance.

Enforcement and Education Are Essential

- **Reduced inspection frequency increases reliance on personal responsibility:** If WoF and CoF intervals are extended, drivers need to actively maintain vehicle safety between inspections. Currently 8 out of 10 Members service their vehicle according to the manufacturers' recommendations. This may not be the case for the broader public. Enforcement and education help reinforce this responsibility.
- **Enforcement creates a compliance incentive:** The possibility of a fine or demerit points motivates people to keep vehicles roadworthy. Without enforcement, compliance rates drop, and unsafe vehicles remain on the road. The key focus of compliance should be when vehicles are used on the road, not parked on a street.
- **Education builds capability and awareness:** Many safety issues (e.g., tyre tread, wiper condition) can be checked by owners without specialist skills. Education campaigns and practical guidance empower people to do these checks regularly.

Enforcement Should Not Be Punitive

- **Equity concerns:** Higher fines disproportionately impact low-income drivers, who are more likely to own older vehicles and already struggle with WoF costs. Punitive measures risk creating financial hardship without necessarily improving safety.
- **Behavioural effectiveness:** Research shows that punitive-only approaches often fail to change long-term behaviour. Combining enforcement with education and support (e.g., reminders, how-to guides) is more effective in building a safety culture.
- **System fairness:** Penalties should be proportionate to risk and applied consistently. Overly harsh fines for minor faults can undermine trust in the system and lead to perceptions of revenue-raising rather than safety improvement. Therefore, fines for obvious vehicle safety faults should be sterner than a fine for just being overdue.

Recommended Balanced Approach

- **Targeted enforcement:** Focus on high-risk behaviours (e.g., driving with bald tyres, expired WoF for long periods) rather than blanket punitive measures.
- **Complementary education:** Public campaigns, online tools, and mechanic-led guidance to help people understand what to check and why it matters.
- **Alternative compliance options:** Consider non-financial penalties like demerit points when caught driving a vehicle with safety faults.
- **Target noncompliant vehicles being driven not parked.** WoF and CoF compliance will fall upon Councils and the Police to enforce. Council enforcement officers are known to walk residential areas monitoring parking infringements. If higher fines are created for WoF & CoF offences, then

this could be seen as a potential revenue stream. A vehicle parked is not being driven and may be parked on the road as off-street parking is not available. A parked car in a residential area without a WoF is not road safety matter. A vehicle driven on our roads without a WoF is a road safety matter. We recommend a two-tier system. A lower fine for a parked vehicle while a higher fine and demerit points should apply when a vehicle is driven without a WoF or CoF.

About the New Zealand Automobile Association

The NZAA is an incorporated society with over 1.1 million personal Members, representing a large proportion of New Zealand's road users. The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport users as well as private motorists.

Across New Zealand, the motoring public regularly come into contact with the AA through our breakdown officers, 36 AA Centres and other AA businesses. Meanwhile, 18 volunteer AA District Councils around New Zealand meet each month to discuss local transport issues. Based in Wellington and Auckland, our professional policy and research team regularly survey our Members on transport issues, and Members frequently contact us unsolicited to share their views. Via the AA Research Foundation, we commission original research into current issues in transport and mobility. Collectively, these networks, combined with our professional resource, help to guide our advocacy work and enable the NZAA to develop a comprehensive view on mobility issues.

Motorists pay around \$4.5 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. This money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, and Police enforcement activity. On behalf of AA Members, we advocate for sound and transparent use of this money in ways that improve transport networks, enhance safety and keep costs fair and reasonable.

Our advocacy takes the form of meetings with local and central government politicians and officials, publication of research and policy papers, contributing to media on topical issues, and submissions to select committees and local government hearings.

Total Membership

2.2 million New Zealanders belong to the AA

Over 1.1 million are Personal Members

Over 1 million are Business Vehicle relationships

% of licenced drivers

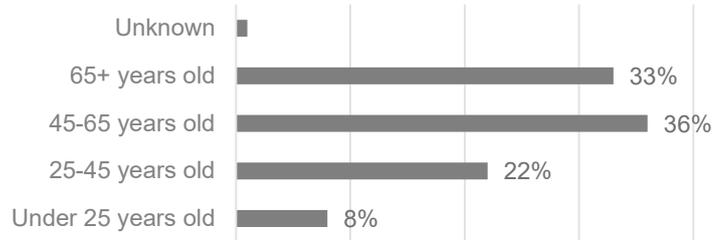
At least 29% of licensed drivers are AA Members

Gender split

54%	Female
46%	Male

Age range & Membership retention

Age of AA Members



52% of AA Members have been with us for over 10 years.

ⁱ [View of The effect of periodic vehicle inspection on road traffic crash risk](#)

ⁱⁱ [e000069_Olesen.pdf](#)

ⁱⁱⁱ [Date of the first MOT test: consultation response](#)