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NZ Automobile Association submission on:

Considering new safety requirements for vehicles entering the New Zealand fleet



SUBMISSION TO: New Zealand Transport Agency / Waka Kotahi

REGARDING: Considering new safety requirements for vehicles entering the New Zealand fleet

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Executive summary

The New Zealand Automobile Association (AA) welcomes the opportunity to provide comment on the proposed changes to safety requirements for vehicles entering the New Zealand fleet.

The AA strongly supports the mandating of

- Automatic emergency braking for light and heavy vehicles.
- Lane keep support systems for light and heavy vehicles.
- Electronic stability control for heavy vehicles.
- Anti-lock braking systems for heavy vehicles.
- Acoustic vehicle alert systems.

The AA also agrees with the phase in period for these safety features and recommends that a full review of WoF and CoF inspection requirements be completed during the phase in period for the proposed mandated features

Benefits of increased vehicle safety features

The AA has consistently supported the introduction and use of vehicle safety features that reduce deaths and serious injuries throughout our history. The proposal to mandate advanced safety features in vehicles entering the New Zealand fleet is welcome. These technologies—automatic emergency braking, lane keep support systems, acoustic vehicle alert systems, electronic stability control (HV only), and anti-lock braking systems (HV only), are proven to reduce the frequency and severity of crashes. Research cited in the discussion document shows that features like automatic emergency braking can cut rear-end crashes by over 50% and reduce fatalities by up to 27%, while lane keep support systems can significantly lower the risk of head-on and run-off-road crashes. Mandating these features will accelerate their uptake, ensuring that New Zealand drivers and vulnerable road users benefit from internationally recognised safety standards sooner.

Aligning with international standards

Aligning New Zealand's vehicle safety requirements with those of key source markets is both practical and necessary. Countries such as Japan, Australia, and the European Union already mandate these features, meaning most new vehicles imported into New Zealand already comply, while the mandating of these features for used vehicles will ensure those vehicles are newer with modern safety features. This alignment will prevent New Zealand from importing less safe vehicles and help modernise our fleet, which is currently older and less safe than those in comparable jurisdictions. With 41% of light vehicles in the fleet rated only one or two stars for safety and disproportionately involved in serious crashes, these changes represent a critical step toward reducing road trauma and meeting the Government's Road Safety Objectives.

Phased implementation is pragmatic

We also support the phased implementation approach outlined in the document, which balances safety improvements with practical considerations for vehicle supply and affordability. Many new vehicles already include these features as standard, and uptake in used imports is increasing due to

overseas regulations in the markets we source the vehicles. This means mandating these technologies is unlikely to create significant cost pressures for consumers or industry. By introducing requirements gradually and allowing exemptions for special-purpose and disability vehicles, the proposals strike an appropriate balance between improving safety and maintaining access to a diverse vehicle market. These changes will help deliver safer roads for all New Zealanders without imposing undue burden on motorists or businesses.

Periodic Inspection of Safety Features

The AA has submitted on proposed changes to the WoF and CoFA regime around the frequency of inspections. In the submission we did not support the light-handed approach of confirming that no visual, audible, or electronic fault indicators are present. The AA believes that there needs to be a rebalancing of frequency and depth of inspection. If we move to less frequency, then there needs to be more in-depth inspection to ensure the safety features in the vehicle function correctly.

We think the light-handed approach is insufficient to guarantee that 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.

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.

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.

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.

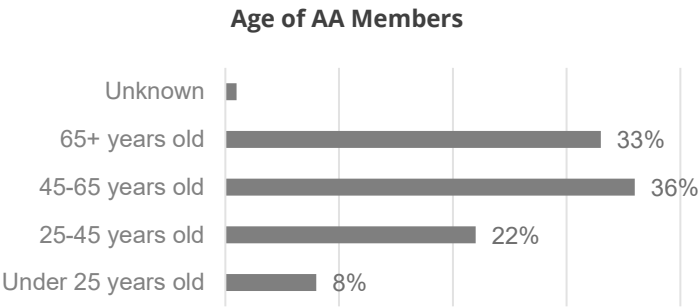
Motorists pay around \$4.5 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. This money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, 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 1.1 million are Business Vehicle Memberships	
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% of licenced drivers	At least 29% of licensed drivers are AA Members	
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Gender split	54%	Female
	46%	Male
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Age range & Membership retention



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